# **The London Borough of Tower Hamlets Compulsory Purchase Order 2025** (APP/PCU/CPOP/E5900/3365599)

## Proof of Evidence of Victoria Coelho

**dated 18 November 2025**

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# 1 INTRODUCTION

## 1.1 Qualifications and experience

1.1.1 I, Victoria Coelho, am a Principal Planning Officer for the London Borough of Tower Hamlets (the **Council**). I have been in this role since 2018. In my role, I am responsible for providing high quality, specialised development management specialist expertise and technical assessment including the delivery of the Council's statutory responsibilities for the determination of planning applications. I am the lead case officer for a number of complex, high profile and strategic development opportunities within the borough. I previously worked in similar roles for Westminster City Council, Croydon Council and Oxford City Council. Accordingly, I have experience in planning development management and estate regeneration and have worked in this industry for approximately 11 years.

1.1.2 This Proof of Evidence is made in support of the London Borough of Tower Hamlets (Harriott, Apsley and Pattison Houses) Compulsory Purchase Order 2025 (the **Order**) **[CD 1.1]**. The Order is required to facilitate the regeneration of the estate which contains Harriott House, Apsley House and Pattison House (**HAP Houses**) and the Redcoat Community Centre and Mosque (the **Estate**). The proposed redevelopment of the Estate comprising a residential-led mixed-use development, with the delivery of more than 400 new homes and a new community centre on Council-owned land currently occupied by existing housing blocks and two community buildings is referred to in this Proof of Evidence as the **Scheme**.

1.1.3 The facts set out in this Proof of Evidence are within my own knowledge and are true to the best of my knowledge and belief. Where reference is made to facts which are outside my knowledge, I set out the source of my information and I believe such information to be true.

1.1.4 I have been assisted by other professional advisors and officers of the Council with the preparation of this Proof of Evidence, some of whom will also provide evidence to the inquiry. However, all views expressed are my own.

## 1.2 Involvement with the Scheme

1.2.1 Until being asked to give evidence on behalf of the Council, I had not had any prior involvement with the Scheme.

1.2.2 Since joining the Council's witness team, I have been working alongside Monju Ali (Housing Supply CPO Co-ordinator) at the Council.

## 2 SCOPE OF EVIDENCE

2.1 I set out the following in my evidence:

2.1.1 The planning status of the Scheme and procedural details including planning history;

2.1.2 The conditions, obligations, and public benefits related to the consented development and that in my view, there are no planning impediments to the implementation of the planning permission**;**

2.1.3 The statutory requirements and compliance with:

(a) National Policy (**NPPF**) – sustainable development objectives;

(b) Regional Policy (London Plan) – housing targets, design-led approach; and

(c) Local Policy (Tower Hamlets Local Plan) – housing mix, community facilities;

2.1.4 Responses to Objectors on the following topics:

(a) Design effectiveness;

(b) Planning impediments;

(c) Consultation adequacy;

(d) Loss of community/social infrastructure; and

(e) Equality and human rights considerations;

2.1.5 I conclude that, in my professional opinion, the proposed development accords with the relevant policy, delivers public benefits, and faces no planning impediments to its implementation.

2.2 I append to this Proof:

2.2.1 Appendix 1: London Plan analysis (housing targets, design, transport, environment); and

2.2.2 Appendix 2: Local Plan analysis (housing mix, affordable housing, community facilities, biodiversity).

## 3 PLANNING HISTORY

### 3.1 Introduction

3.1.1 The Planning Permission (as defined in paragraph 3.2.1 below) has been granted for the development proposals for the Scheme. In this section, I set out the Estate's planning history as well as the procedural details of the Planning Permission which is intended to be implemented. I set out the legislation and policy that the planning application for the Planning Permission was assessed against.

3.1.2 I cover the consultation carried out in association with the Planning Permission, as well as the public benefits that are considered to arise as a result. I outline the planning conditions and obligations to which the Planning Permission is subject and confirm that I do not consider there to be any planning impediments to delivery of the Scheme.

### 3.2 Planning history

The Estate is subject to the following, relevant, planning history:

3.2.1 PA/24/00368 (granted 27 June 2025) (the **Planning Permission**) **[CD 4.2]**

Redevelopment of the site comprising the demolition of existing buildings (including Harriot House, Apsley House, Pattison House, The Redcoat Centre and Redcoat Community Centre) to provide 407 residential units (Class C3) across buildings ranging in height from 4-8 storeys and community centre building of 1,167m2 GIA (Class E (e-f), Class F1 (e-f), Class F.2 (b)), together with associated landscaped communal amenity space, accessible car parking, secure cycle parking spaces and refuse/recycling storage facilities (hereinafter referred to as the **Development**).

3.2.2 PA/21/02703 (granted 9 August 2023) (the **2023 Permission**) **[CD 4.1]**

Redevelopment of the site comprising demolition of existing buildings (including Harriott House, Apsley House, Pattison House, The Redcoat Centre and Redcoat Community Centre) to provide 412 residential units (Class C3) and 1,192m2 GIA of community use (Class E (e-f), Class F1 (e-f), Class F.2 (b)) provided across buildings ranging in height from 4-8 storeys, together with associated landscaped communal amenity space, accessible car parking, secure cycle parking spaces and refuse/recycling storage facilities.

3.2.3 PA/20/01570 – (EIA not required 13 August 2020)

Request for an Environmental Impact Assessment (EIA) Screening Opinion pursuant to Regulation 6 of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 in respect of a planned estate regeneration scheme relating to the 7 housing blocks (known collectively as Harriott House, Apsley House and Pattison House) bounded by Stepney Way the north, Jamaica Street to the west, Aylward Street to the south and Wellesley

Street to the east and also including the Redcoat Centre and Redcoat Community Centre

3.2.4 PA/10/01857 (granted 26 October 2010)

The retention of single-storey porta-cabin structures to the south and the north of the Redcoat Community Centre to provide community facilities (Use Class D1)

3.2.5 PA/06/02253 (granted 11 April 2007)

Retention of a single storey extension to the south of the existing Redcoat Community Centre (Phase 1) and erection of single storey extension to the north of the existing Redcoat Community Centre (Phase 2) to provide 324 sq m of additional community facilities (Class D1 Use) for a temporary period.

3.2.6 PA/05/00166 (granted 24 March 2005)

Extension to the existing community building (D1 use class) by the positioning of a 145sqm portacabin unit alongside the existing building and creation of path to the new main entrance – permitted (24/03/2005)

3.2.7 PA/04/01135 – (granted 4 November 2004)

Extension to the existing community building (D1 use class) by the positioning of two pre-fabricated units at the rear and creation of path to the proposed new entrance

3.3 **Pending Applications**

The following applications are pending consideration:

3.3.1 PA/25/01830 – (validated 15 October 2025)

Submission of details pursuant to condition no.6 (Code of Construction Practice Checklist) of planning permission PA/24/00368, dated 27/06/2025.

3.3.2 PA/25/01859 – (validated 20 October 2025)

Submission of details pursuant to condition no.20 (Archaeology) of planning permission PA/24/00368, dated 27/06/2025.

3.3.3 PA/25/01941 – (received 6 November 2025)

Application for Non-Material amendment to planning permission ref: PA/24/00368, Dated 27/06/2025.

Non Material amendment(s) Sought: Change to the energy strategy

3.4 **The Planning Application and Planning Permission**

3.4.1 This Proof relates to the Planning Permission **[CD 4.2]** as described at paragraph 3.2.1. The Scheme is intended to be implemented by way of the Planning Permission and broadly follows that approved under the 2023 Permission **[CD**

**4.1]**. The Development in terms of its bulk, scale, form, layout and mix of uses, is substantially similar to the scheme pursuant to the 2023 Permission. The primary changes comprise the relocation of the community floorspace to a standalone building on the south-east corner of the site (with minor associated changes to the residential floorspace), the provision of second staircases to the taller blocks and a marginal increase in height of blocks to facilitate blue/ green roofs.

3.4.2 Reference to the **Planning Application** in this Proof means the application submitted by the Council on 1 March 2024 for the Planning Permission **[CD 4.2]**.

3.4.3 In line with the requirements of the Council's Statement of Community Involvement **[CD 4.5]**, consultation was undertaken by the Council with local residents during the course of the Planning Application.

3.4.4 A press advert was displayed on 28 March 2024 on account of the application being a major development. In addition, 3 site notices were displayed around the Estate. Letters were sent to 879 nearby owners and occupiers. A total of 2 objection letters and 1 letter of support were received by the Council with the comment in support noting that the benefits of an increase in social housing was supported.

3.4.5 A number of statutory and non-statutory consultees were consulted on the application, none of which raised any significant objections. The Greater London Authority (the **GLA**) confirmed that the Development would not raise any strategic issues.

3.4.6 The Planning Permission will deliver a mixed-use development of new buildings ranging between 4-8 storeys to provide 407 new homes and 1,167m2 (GIA) of community use floorspace (Class E (e-f), Class F1 (e-f), Class F2), together with landscaped communal amenity spaces.

3.4.7 The Development includes the re-provision of the existing Social Rented homes and the Resident Leaseholder (shared equity) homes on the site plus an additional 343 homes of which 40.5% are affordable. The new community space comprising 1,1167 sqm of floorspace would result in a slight uplift in net area compared to the existing floorspace.

3.4.8 Legislation requires that decisions on planning applications must be taken in accordance with the Development Plan (as defined below) unless there are material considerations that indicate otherwise, and that was the approach taken to determining the Planning Application.

3.4.9 The Council's **Development Plan** comprises:

(a) The London Plan (2021) (the **London Plan**) **[CD 3.2]**; and

(b) The Tower Hamlets Local Plan 2031 (2020) (the **Local Plan**) **[CD 3.3]**.

3.4.10 The key development plan policies and issues considered relevant to the proposal in determining the Planning Application were:

(a) Land Use (residential, community):

i London Plan policies: H1, GG1, GG2, GG4, S1, D1, D3

ii Local Plan policies: S.H1, S.CF1. D.CF2, D.CF3. S.SG1, S.SG2

(b) Housing (affordable housing, housing mix, housing quality, fire safety, amenity):

i London Plan policies: D6, D7, D11, D12, H4, H5, H6, H8, H10

ii Local Plan policies: S.H1, D.H2, D.H3

(c) Design and Heritage (layout, townscape, massing, height, appearance, materials, heritage):

i London Plan policies: D1, D3, D4, D5, D8, D9, HC1, HC2, HC3, HC4

ii Local Plan policies: S.DH1, D.DH2, S.DH3, D.DH4, D.DH6, D.DH7

(d) Amenity (privacy, outlook, daylight and sunlight, noise, construction impacts): Local Plan policy: D.DH8

(e) Transport (sustainable transport, highway safety, car and cycle parking, servicing):

i London Plan policies: T2, T4, T5, T6, T6.1, T7, T8

ii Local Plan policies: S.TR1, D.TR2, D.TR3, D.TR4

(f) Environment (air quality, biodiversity, contaminated land, flooding and drainage, energy efficiency, noise, waste):

i London Plan policies: G5, G6, SI1, SI2, SI5, SI8, SI12, SI13

ii Local Plan policies: S.ES1, D.ES2, D.ES3, D.ES4, D.ES5, D.ES6, D.ES7, D.ES8, D.ES9, D.MW3

3.4.11 The Planning Permission **[CD 4.2]** has been granted subject to a number of conditions as allowed by Section 70(1)(a) of the Town and Country Planning Act (the **1990 Act**). In total, there are 47 conditions, 15 of which are compliance conditions to ensure that the Development is carried out in accordance with the approved plans and in a way that minimises disruptions to surrounding occupiers during construction and operation.

3.4.12 13 of the conditions imposed are pre-commencement conditions and require the submission of additional information to be approved in writing by the Council prior to the commencement of the Development. The details secured by these conditions include wind and biodiversity mitigation measures, the provision of financial and non-financial planning obligations, construction methodologies

including contaminated land remediation and piling and archaeological investigations.

3.4.13 Applications have been submitted to the Council to discharge 2 of the above pre-commencement conditions. The submissions relate to Condition 6 (Code of Construction Practice Checklist) and Condition 20 (Archaeology) of the Planning Permission **[CD 4.2]**.

3.4.14 7 of the conditions imposed require the submission of details prior to the commencement of superstructure works. The details secured include those relating to water efficiency measures, highway works (s278), ventilation strategy, SUDS, communal amenity space and child's play space and external facing materials.

3.4.15 14 of the conditions imposed required the submission of details prior to the occupation of the development. The details secured include those relating to phasing management strategy, noise mitigation measures, car and cycle parking, waste management, travel plan, car and cycle parking, energy efficiency standards, delivery and servicing, secure by design accreditation and circular economy.

3.4.16 In my professional opinion, there are currently no impediments to the discharge of the planning conditions when applications for the approval of the relevant details are made. The conditions are not unusual in the context of a development of this type.

3.5 **Planning obligations**

3.5.1 Planning obligations are legal obligations entered into to mitigate the impacts of a development proposal and would normally be set out in an agreement under a section 106 of the 1990 Act. Such an agreement in relation to the Planning Application could be entered into as the Council is both the applicant for Planning Permission and landowner as well as the local planning authority. However, the relevant obligations have been secured by way of planning conditions upon the Planning Permission and a letter between Council directors dated 18 June 2025 (the **Director Letter**) **[CD 4.7]**.

3.5.2 The Council (as landowner) has agreed to meet all of the financial contributions that are sought by the Council's Planning Obligations SPD (2021), as follows:

(a) £190,632 towards construction phase employment skills training; and

(b) £349,125 toward carbon emission off-setting.

3.5.3 The Council (as landowner) has also agreed to meet the following non-financial obligations:

(a) Reprovision of 64 units of housing; 28 Resident Leaseholder (RL) properties (as shared equity units) and the 36 Secure Tenant (ST) properties:

i 40.5% of affordable housing by habitable room (excluding reprovision):

ii 22 units (66 habitable rooms) at London Affordable Rent

iii 69 units (308 habitable rooms) at Tower Hamlets Living Rent

iv 20 units (60 habitable rooms) as Shared Ownership

v Early, Mid and Late Stage Review

vi Details and implementation of London Affordable Rent/Tower Hamlets Living

vii Rent 'wheelchair accessible' dwellings (to M4 (3)(2)(b) standard)

(b) Access to Employment:

i 20% local procurement during the construction phase

ii 20% local labour in construction

iii 29 construction phase apprenticeships

(c) Transport matters:

i Car Free development (residential)

ii Approval and implementation of Car Park Management Plan (including for increasing on-street provision of accessible car parking spaces)

iii Travel Plans

iv Scheme of Highway Works

v Public access to the inner street

vi Compliance with Considerate Constructors Scheme

3.6 **Planning and other public benefits arising from the Scheme**

The Scheme by way of the Development would deliver a number of planning and public benefits, including:

3.6.1 the affordable housing provision, being the most notable benefit. In the determination of the Planning Application, significant weight was given to the re-provision of all of the existing social rented and intermediate tenure homes and the focus on delivering a large portion of family sized homes. In my professional opinion I would agree with giving such weight to this benefit;

3.6.2 the market housing provision is another notable benefit. The provision of new, additional, market homes contributes towards the housing targets set out in the Local Plan, which demonstrates a significant housing need within the Council's borough (the **Borough**). The provision would be a high quality addition to the housing stock; and

3.6.3 the improved community facility and improvements to the layout, landscaping, public realm and movement and connectivity around and through the Estate. The Development will provide 8,330 sqm of landscaped open space in the form of two communal courtyards, open areas of green space surrounding the perimeter blocks and an inner street running through the development. Of the 8,330 sqm, approximately 3,800 sqm would be open to the public. Although there is some quantum loss of the existing 9,169qm of open space on the Estate, this would be outweighed by the enhanced quality of the provision pursuant to the Development, the variety of soft and hard landscaped areas, the provision of public, communal and private spaces and improvement to access routes, and an increase in biodiversity within the Estate.

3.7 **Conclusion**

Planning Permission has been granted for the Development of the Estate and, in granting the Planning Permission, the relevant consultation was carried out. The Planning Permission will deliver a range of public benefits secured through conditions and obligations. At this time, I do not consider there to be any planning impediments to the carrying out the Scheme by way of the Planning Permission.

## 4 PLANNING POLICY

### 4.1 Introduction

4.1.1 As set out in the Ministry of Housing, Communities & Local Government's "Guidance on the Compulsory Purchase Process" (2025) (the **Guidance**) **[CD 3.5]**, local planning authorities should demonstrate that proposals are consistent with planning policy. I am advised that the purpose of this requirement is to satisfy the decision maker that there are unlikely to be any planning impediments to the delivery coming forward. In the present case, the Planning Permission **[CD 4.2]** has been granted so it remains extant and capable of implementation, such that there is no planning impediment. Notwithstanding that the Planning Permission has been granted for the Scheme, I address at a high level the compliance of the Development with policy at a national, regional and local level, as this also supports the Council's overall compelling case.

4.1.2 A comprehensive appraisal of the proposed development and all relevant planning policy is set out in the report brought by the Development Committee dated 12 June 2024 **[CD 2.5]**. There have been no changes to the Development Plan since the Committee report was produced and, although the NPPF **[CD 3.1]** has been updated, the changes are not material insofar as they are relevant to the Development. I have provided a summary below in respect of each strand of applicable planning policy and have commented on how these policy objectives are being secured through the delivery of the Planning Permission and, thereby, the Scheme.

### 4.2 Overview

4.2.1 Section 70(2) of the 1990 Act **[CD 7.9]** and Section 38(6) of the Planning and Compulsory Purchase Act 2004 (as amended) (the **2004 Act**) **[CD 7.5]** require that planning applications should be determined in accordance with the development plan, unless material considerations indicate otherwise.

4.2.2 Section 66(1) of the 1990 Act relates to applications that affect a listed building or its setting. It requires the decision maker 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*".

4.2.3 The NPPF reconfirms the statutory requirement set out in Section 38(6) of the 2004 Act relating to the determination of planning applications and also confirms that the NPPF should be taken into account as a material planning consideration in planning decisions.

4.2.4 Section 38(2) of the 2004 Act defines the Development Plan for any area of Greater London as:

(a) the Spatial development strategy;

(b) the development plan documents (taken as a whole) which have been adopted or approved in relation to that area; and

(c) the neighbourhood development plans which have been made in relation to that area.

4.2.5 In the present instance, as noted above, the current adopted Development Plan for the Borough area, against which the Planning Permission for the Scheme falls to be judged, comprises the London Plan and the Local Plan.

4.2.6 Paragraph 49 of the NPPF **[CD 3.1]** states that weight may be given to planning policies in emerging plans according to their stage of preparation, i.e. the more advanced its preparation, the greater the weight that may be given. The only planning policy document in the process of being prepared is the draft Local Plan, currently under consultation and review by the Council (the **Draft Local Plan**). The Council has carried out a consultation (under Regulation 19) and reviewed the representations received. Cabinet agreed on Wednesday 15 October that the Draft Local Plan should proceed to the Wednesday 19 November 2025 meeting of Full Council for approval. The next update is anticipated to be in late 2025 or early 2026, when the Council intends to submit the Draft Local Plan to the Secretary of State.

4.2.7 Of particular note within the Draft Local Plan is the Borough's housing target which is set at 52,095 new homes to be developed between 2023/2024 to 2038/2039 which translates to an annual target of 3,473 homes. This relates to total net housing supply. The strategic target is based on Policy H1 (Increasing housing supply) of the London Plan and rolls forward the existing London Plan housing target for the period beyond the London Plan period.

4.2.8 Although lower than the target set out within the current adopted Local Plan, it is still a significant number to which the development will contribute towards.

4.2.9 Other relevant guidance includes:

(a) Better Homes for Local People: The Mayor's Good Practice Guide to Estate Regeneration (2018) (the **GPGER**) **[CD 3.6]**;

(b) Housing Design Standards LPG (2023);

(c) Optimising Site Capacity LPG (2023); and

(d) LP Housing SPG (updated 2017).

## 4.3 National Planning Policy Framework (NPPF)

4.3.1 The revised NPPF was published in December 2024 and updated in February 2025. As national policy, the NPPF was a material consideration when determining the Planning Application. The NPPF aims for sustainable development including the provision of homes, commercial development and supporting infrastructure (paragraph 7).

4.3.2 Paragraph 8 of the NPPF defines three over-arching objectives of the planning system to deliver sustainable development:

(a) Economic – helping to build a strong economy by ensuring that enough of the right type of land is available in the right places;

(b) Social – supporting communities by ensuring that a sufficient number and range of homes can be provided and fostering a well-designed and safe built environment; and

(c) Environmental – protecting and enhancing the environment by making effective use of land, helping to improve biodiversity, using natural resources prudently and minimising waste and pollution.

4.3.3 Increasing housing supply is a fundamental policy objective at national, regional and local levels. The NPPF **[CD 3.1]** encourages the effective use of land through the reuse of suitably located previously developed land and buildings. Paragraph 125(c) of the NPPF states that planning decisions should give substantial weight to the value of using brownfield land within settlements for homes and other identified needs.

4.3.4 The Scheme implemented by way of the Planning Permission **[CD 4.2]** will increase the level of housing, both market and affordable, on an existing residential site consistent with the objectives of the NPPF in terms of housing supply and brownfield land.

## 4.4 The London Plan

4.4.1 The London Plan **[CD 3.2]** was formally adopted in March 2021. It provides a strategic spatial strategy within Greater London and forms part of the Council's Development Plan. The London Plan sets out a number of objectives:

(a) building strong and inclusive communities;

(b) making the best use of land;

(c) creating a healthy city;

(d) delivering the homes Londoners need;

(e) growing a good economy; and

(f) increasing efficiency and resilience.

4.4.2 I set out my analysis of compliance of the Planning Permission with the London Plan in Appendix 1.

## 4.5 The Local Plan

I set out my analysis of compliance of the Planning Permission with the Local Plan in Appendix 2.

## 4.6 Other Relevant Policy and Guidance

4.6.1 The Mayor of London's Housing Supplementary Planning Guidance (March 2016, updated August 2017) **[CD 3.7]** includes the guidance relevant to estate

regeneration. The guidance states the overarching objectives for any estate regeneration scheme will usually be to:

(a) deliver safe and better quality homes for local people;

(b) increase the overall supply of new and affordable homes; and

(c) improve the quality of the local environment through a better public realm and provision of social infrastructure (e.g. schools, parks, or community centres)

4.6.2 It is my view that the consented development would achieve the objectives set out in the Mayor's Guidance as set out in the analysis of compliance with the Development Plan in Appendices 1 and 2.

## 4.7 Conclusion

4.7.1 In line with the GPGER **[CD 3.6]** the Development would re-provide 36 existing social rented (secure tenant) homes and 28 resident leaseholder (shared equity) homes; and in addition would optimise the site capacity to deliver a further 343 new homes, with a 40.5% uplift in affordable housing (i.e. excluding re-provided homes). Overall, 53.3% of the proposed habitable rooms would be affordable. All proposed homes would meet the London Plan's **[CD 3.2]** minimum space standard and would have private amenity space provision that meets minimum standards.

4.7.2 The proposed land use is strongly supported and would assist the Council in meeting its housing targets. In particular, the overall provision of 175 affordable homes, including the reprovision, would serve the needs of local residents.

4.7.3 The scale, form, detailed design and materiality of the development would respond appropriately to the character and appearance of the surrounding streets. Two communal courtyards for the future residents are proposed, along with a public 'inner street' to provide a convenient pedestrian and cycle route from Stepney Way to Aylward Street, improving connectivity in the area. Dedicated child play space would be introduced, which does not exist on the site at present. There would also be significant tree planting.

4.7.4 The proposal would have an acceptable impact on neighbouring residential amenity. The Development would provide policy compliant cycle storage wheelchair accessible parking; and would meet Council policy on net zero carbon and biodiversity net gain.

4.7.5 This Planning Application was considered against the Development Plan policies within the Local Plan 2031 (January 2020) and London Plan (2021); and against the NPPF and all other material considerations and in my professional opinion, correctly recommended for approval.

4.7.6 Please see Monju Ali's Proof of Evidence **[CD 10.1]** for more detail as to how the Scheme is designed/expected to meet local housing targets.

## 5 RESPONSE TO OBJECTORS

In this Section, I set out responses to the objections which refer to planning related issues.

### 5.1 Objection 1 [CD 8.2]:

5.1.1 *Ground 2: acquiring authority has not demonstrated that the design of the scheme is effective and appropriate*.

5.1.2 *Response:* The Planning Application was assessed against the relevant design policies, and is considered to comply. The Council as the applicant has demonstrated a design-led approach and sought extensive pre-application engagement to develop the design. The Planning Application was also reviewed by the Council's (as local planning authority) Conservation Area Design Review Panel, who were broadly support of the Scheme, with areas of concerns addressed within the final designs. The Development is of an acceptable density as demonstrated by the design-led approach that has been taken and the compliance with the relevant planning policies.

5.1.3 *Ground 3: The acquiring authority has not demonstrated that there are no planning or other impediments to the delivery of the scheme.*

5.1.4 *Response:* The Scheme has an extant planning permission (being the Planning Permission **[CD 4.2]**, and it is considered reasonable that all of the required conditions can be met, to allow for the implementation of the permission. Furthermore, the delivery of all of the relevant planning obligations is secured pursuant to the Director Letter **[CD 4.7]**.

5.1.5 *Ground 5: There has been a lack of proactive and meaningful consultation with the objector, despite the impact on its legal and financial interests.*

5.1.6 *Response:*

(a) All statutory planning consultation carried out including the erection of site notices, a press notice and neighbour notification letters. The scope of consultation was in line with the Council's Statement of Community Involvement **[CD 4.5]**.

(b) The objections received in relation to the Planning Application were regarding the displacement of residents and increased costs of accommodation and the construction impacts of the Development. These concerns are addressed through the securing of affordable housing including rent levels through the Director Letter obligations **[CD 4.7]** and conditions relating to construction management.

### 5.2 Objection 2a and 2b [CD 8.3 and 8.4]:

5.2.1 *Ground 1: Lack of Meaningful Consultation: Despite the Council's statutory obligations, residents and stakeholders were not adequately engaged or consulted. Information about the proposed development was poorly disseminated, and key concerns raised during preliminary consultations have not been meaningfully addressed; and*

5.2.2 *Ground 2: Loss of Community and Social Infrastructure: Harriott House, Apsley House, Pattison House is home to a long-established and cohesive community. The proposed development threatens to displace residents, many of whom have deep roots in the area. No sufficient guarantees have been given regarding the right to return, affordable housing provision, or safeguarding of community facilities and unclear public interest justification.*

5.2.3 *Response:*

(a) The consented Development includes the reprovision of all existing homes currently on the Estate, including affordable housing, the details of which are secured through the Director Letter obligations **[CD 4.7]**. The re-provided community centre has also been secured in this way to ensure its delivery.

(b) The Planning Permission allows for the Development to be phased through conditions, to allow for a single decant to take place in order to reduce the impacts of displacement due to the Scheme.

(c) Further details on engagement and guarantees to residents can be found in the Proofs of Evidence of Timothy Surry **[CD 10.3]** and Monju Ali **[CD 10.1]**.

5.3 **Objection 3a and 3b**

*5.3.1* *Ground 7: Lack of Transparency and Declining Estate Conditions: The regeneration process has been marked by a lack of transparency with residents receiving minimal information on critical aspects of the development, including the mix between social and private housing, pricing, service charges, or maintenance standards. Furthermore, the general condition of the estate has visibly declined since the regeneration accelerated, while service charges in the estate continue to rise*

5.3.2 *Response:* In terms of the Planning Permission, all relevant details of the submission have been publicly accessible on the planning register including the information regarding the tenure mix of the development and affordable rent levels. Monju Ali's Proof of Evidence **[CD 10.1]** further deals with this objection beyond the planning aspect.

*5.3.3* *Ground 9: Inadequate Community Engagement and lack of empathy: The Council's outreach throughout the regeneration process has been inadequate. Beyond a few tokenistic community meetings, there has been little genuine engagement with residents. This limited and box-ticking approach demonstrates a concerning lack of empathy and understanding of the deep emotional and cultural significance this estate holds for families within the Estate.*

5.3.4 *Response:* As mentioned above, all relevant statutory consultation required for the Planning Application was carried out and in line with the Council's Statement of Community Involvement **[CD 4.5]**. Only three responses were received. Monju Ali's Proof of Evidence **[CD 10.1]** deals further with this objection beyond the planning aspect.

## 6 CONCLUSION

6.1 Although I have not previously worked on the Scheme, I have considered the Planning Permission (including the Officers' Report and recommendation [**CD 2.5**]) and am of the professional opinion that the Planning Permission accords with national policy and the Development Plan and the recommendation to approve planning permission was correctly supported by the Council (as local planning authority).

6.2 I am satisfied that the Scheme to be implemented by way of the Planning Permission will provide much needed homes, community facilities and improved public realm and connectivity and promote all of the objectives of the planning policy I have noted above.

6.3 I am satisfied that there will be no planning impediment to the delivery of the Scheme.

## 7 STATEMENT OF TRUTH AND DECLARATION

### 7.1 Statement of Truth

I confirm that I have made clear which facts and matters referred to in this report are within my own knowledge and which are not. Those that are within my own knowledge I confirm to be true. The opinions I have expressed represent my true and complete professional opinions on the matters to which they refer.

### 7.2 Declaration

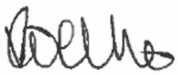
I confirm that my report has drawn attention to all material facts which are relevant and have affected by professional opinion.

I confirm that I understand and have complied with my duty to the inquiry as an expert witness which overrides any duty to those instructing or paying me, that I have given my evidence impartially and objectively, and that I will continue to comply with that duty as required.

I confirm that I am not instructed under any conditional or other success based fee arrangement.

I confirm that I have no conflicts of interest.

I confirm that I am aware of and have complied with the requirements of the rules, protocols and directions of the inquiry.

Signed:  Dated: 18 November 2025

**Victoria Coelho**

# Appendix 1 – London Plan analysis

## 1 Land Use (residential, community) - London Plan policies: H1, GG1, GG2, GG4, S1, D1, D3

1.1 London Plan policy GG2 part (c) states that to create sustainable mixed-use places that make the best use of land, those involved in planning and development must proactively explore the potential to intensify the use of land to support additional homes…, promoting higher density development, particularly in location that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling. London Plan and Local Plan policies resist the loss of existing housing; unless the existing housing is re-provided. The delivery of housing, and particularly affordable housing, is of the highest priority in the borough.

1.2 London Plan Policy H1 sets Tower Hamlets a housing completion target of 34,730 units between 2019/20 and 2028/29. The proposed development results in a net uplift of 307 new homes on the site, which would make an important and significant contribution towards meeting the above target.

## 2 Housing (affordable housing, housing mix, housing quality, fire safety, amenity) - London Plan policies: D6, D7, D11, D12, H4, H5, H6, H8, H10

2.1 London Plan policy H8 requires that loss of existing housing be replaced by new housing at existing or higher densities with at least the equivalent level of overall floorspace. This policy also seeks a consideration of alternative options before the demolition and replacement of affordable homes. In addition, the policy requires the replacements Social Rent units to be provided as Social Rent where facilitating a right of return for existing tenants.

2.2 The GPGER provides detailed guidance for assessing approaches to estate regeneration. The GPGER puts great emphasis on early consultation and engagement with residents and requires all estate regeneration schemes to provide an increase in affordable housing, full rights to return or remain for social tenants, and a fair compensation deal for leaseholders and freeholders.

2.3 London Plan Policy H8 states that replacement affordable housing must be provided at Social Rent levels, where it facilitates a right of return for existing Social Rent tenants. There are currently 36 Secure Tenant (social rented) homes on the Estate, with a right to return. As proposed, all 36 homes would be re-provided for these Secure tenants on a like for like basis, who would continue to be a tenants of the Council with their existing tenancy rights such as the right to buy and succession rights retained. These tenants would be charged according to the same Social Rent calculation formula, with the same assumptions, as prior to moving.

2.4 There are also currently 28 Resident Leaseholder homes currently on the Estate. These Resident Leaseholder homes would, line with the GPGER, be re-provided as ‘shared equity’ units. Although the ‘shared equity’ product is not specifically identified as an intermediate affordable housing product, the proposed shared equity product would be similar to the standard ‘shared ownership’ product; with the possibility to staircase. The product is secured through the Director Letter, along with the affordable housing obligations and as such, the council classifies these homes to be an intermediate affordable housing product.

2.5 The other existing homes on the estate – occupied by non- resident leaseholders and those on short- term tenancies, do not have a statutory 'right to return'.

2.6 *Alternatives to demolition:*

London Policy H8 states that before considering demolition of existing estates, alternative options should first be considered, and the potential benefits associated with the option to demolish and rebuild an estate set against the wider social and environmental impacts. The Estate currently has considerable issues, including damp, overcrowding and poor-quality amenity space. The regeneration programme would re-provide homes to modern standards by delivering high-quality residential development, re-provide an improved community space and would increase affordable housing provision.

2.7 *Maximising additional genuinely affordable housing:*

As set out in the GPGER, in addition to ensuring no net loss of affordable homes, estate regeneration schemes must provide as much additional affordable housing as possible. An additional 111 new affordable homes would be provided by the Scheme implemented by way of the Planning Permission, which equates to 40.5% of the additional homes. This is supported and is deemed to be the maximum reasonable amount of additional affordable housing. In addition, it is understood that the Council proposes that 22 of the additional affordable homes would be allocated to qualifying adult children who currently live with their parents in overcrowded accommodation on the Estate, which is strongly supported. These units would be provided at London Affordable Rent levels and limited to one applicant per property.

2.8 *A fair deal for leaseholders and freeholders:*

As set out in the GPGER, leaseholders and freeholders affected by estate regeneration should be treated fairly and fully compensated if their homes are to be demolished. As detailed in the 'Proposed decant strategy' report **[CD ]**, leaseholders (noting the Council is the freeholder) would be offered fair compensation in line with requirements.

2.9 *Full and transparent consultation:*

The GPGER requires any landlord seeking GLA funding for estate regeneration projects which involve the demolition of existing affordable or leasehold homes to demonstrate that they have secured resident support for their proposals through a ballot, subject to certain specified exemptions and transitional arrangements. The Council's capital delivery team undertook a ballot in April 2020, which resulted in a 98% 'yes' vote to the scheme based on a 93% turnout. In addition, the Statement of Community Involvement **[CD 4.5 ]** sets out details of the public consultation and engagement undertaken. The scope and extent of the engagement as detailed in the Statement of Community Involvement generally accords with the key principles set out in the Mayor of London's GPGER.

2.10 *Affordable Housing:*

London Plan policy H8 (Estate Redevelopment) part E states that all development proposals that include the demolition and replacement of affordable housing are required to follow the Viability Tested route and should seek to provide an uplift in affordable housing in addition to the replacement affordable housing floorspace. Paragraph 4.85 of the supporting text to the policy states that estate regeneration that involves the loss and replacement of

affordable housing should deliver an uplift in affordable housing wherever possible. Therefore, all such estate regeneration schemes must go through the Viability Tested Route to demonstrate that they have maximised the delivery of any additional affordable housing.

2.11 The Planning Application was supported by a Financial Viability Assessment (FVA) prepared by Redloft **[CD 4.6]**. Following a robust review of the submitted viability evidence, the Council's viability team has concluded that the Scheme is providing the maximum reasonable amount of affordable housing, in line with London Plan policy H8. The consented Planning Permission is subject to an Early Stage Review secured through the Director Letter. This would re-consider viability in the event that the Planning Permission is not implemented within two years from the date it is granted. A Mid Stage Review (at the end of phase 1) and a Late Stage Review is also required.

2.12 London Plan policy D6 sets out the minimum internal space standards for new dwellings. This policy also requires the maximisation of dual aspect dwellings and the provision of sufficient daylight and sunlight to new dwellings. Out of the total proposed units, 67% would be dual aspect. and the layout of the units has been designed such that there would be no north facing single aspect units, which is welcomed. The proposed unit sizes meet the London Plan's minimum standard. The residential quality of the scheme is generally high.

**3 Design and Heritage (layout, townscape, massing, height, appearance, materials, heritage) - London Plan policies: D1, D3, D4, D5, D8, D9, HC1, HC2, HC3, HC4**

3.1 Chapter 3 of the London Plan **[CD 3.2]** sets out key urban design principles to guide development in London. Design policies in this chapter seek to ensure that development: optimises site capacity; is of an appropriate form and scale; responds to local character; achieves the highest standards of architecture, sustainability and inclusive design; enhances the public realm; provides for green infrastructure; and respects the historic environment.

3.2 London Plan policy D3 promotes the design-led approach to optimise site capacity. The policy requires high density development to be located in locations well connected to jobs, services, infrastructures and amenities, in accordance with London Plan D2 which requires density of developments to be proportionate to the site's connectivity and accessibility.

3.3 Given the location of the Estate with its good access to jobs, amenities and public transport, as well as the generally good quality design of the Development, the proposed density is appropriate.

3.4 The overall distribution of height responds positively to the surrounding context.

3.5 Policy D5 of the London Plan **[CD 3.2]** requires all developments to meet the highest standards of accessible and inclusive design. The access strategy demonstrates that the development would be accessible to all. Fire evacuation lifts would also be provided within the Development as required by Policy D5.

3.6 The Scheme implemented by the Planning Permission is unlikely to result in harm to the setting or significance of heritage assets in the vicinity of the Estate. The Scheme would not harm the setting or significance of the conservation area or of any of heritage assets in the vicinity of the site. As such, the proposals would comply with London Plan Policy HC1.

## 4 Transport (sustainable transport, highway safety, car and cycle parking, servicing) - London Plan policies: T2, T4, T5, T6, T6.1, T7, T8

4.1 London Plan Policy T6.1 requires residential developments with PTAL 4 and 5 for inner London to be car-free. The policy requires the provision of disabled persons parking for new residential developments ensuring 3% provision from the outset with additional 7% to be provided upon request. The policy also states that new residential car parking spaces should provide at 20% of active charging facilities with passive provision for all remaining spaces.

4.2 The Development incorporates 35 disabled persons parking spaces (33 within the car park; and 2 along the internal road). Given that any additional provision on-site would be at the expense of open space, play space and public realm, this level of provision (which is slightly less than required by the policy) is judged to be appropriate.

4.3 In accordance with London Plan policy, a condition will be secured requiring that 7 of the car parking spaces would have Electric Vehicle Charging Points (EVCPs) and the rest would have passive provision for EVCPs.

4.4 Long and short stay cycle parking in line with the London Plan standards in terms of quantity and design has been secured by condition. Furthermore, a Construction Logistics Plan, delivery and Servicing Plan, Travel Plan have all been secured by condition.

4.5 Overall, the proposals are acceptable in strategic transport terms and comply with the relevant London Plan policies.

## 5 Environment (air quality, biodiversity, contaminated land, flooding and drainage, energy efficiency, noise, waste) - London Plan policies: G5, G6, SI1, SI2, SI5, SI8, SI12, SI13

5.1 The Council has calculated the urban greening factor (UGF) score of the proposed development as 0.447 which exceeds the target set by London Plan Policy G5.

5.2 Policy SI13 sets out that development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible.

5.3 The flood risk and drainage strategy submitted with the Planning Application was considered acceptable in principle, with full details secured via condition.

5.4 London Plan GG3 requires developments to assess their potential impacts on the mental and physical health and wellbeing of communities through the use of Health Impact Assessments (**HIA**). Local Plan policy D.SG3 requires major developments referable to the GLA to provide an HIA.

5.5 The Planning Application was supported by an HIA, which demonstrates that the development would provide, through its design, health benefits to existing and future residents in compliance with the relevant policies. .

# Appendix 2 – Local Plan analysis

1 **Land Use (residential, community) - Local Plan policies: S.H1, S.CF1. D.CF2, D.CF3. S.SG1, S.SG2**

1.1 Policy S.SG1 directs new development towards opportunity areas and highly accessible locations. The Estate has a PTAL (Public Transport Accessibility Level) of 4 and 5, which is very good, on a scale of 0-6b with 0 being the worst. There are 5 bus routes within 650 metres of the site. Limehouse Station is 950 metres south east of the site providing access to National Rail services and Docklands Light Railway (DLR) services between Bank and Lewisham, Bank and Woolwich Arsenal and Tower Gateway and Beckton. It is an approximately 11-minute walk to Stepney Green Underground Station and an approximately 13-minute walk to Whitechapel Station.

1.2 *Residential*

1.2.1 Policy S.H1 sets out the strategic housing supply requirements for the Borough of 58,965 new homes across the Borough (equating to at least 3,931 new homes per year) between 2016 and 2031. The Borough's housing supply target relates to total net housing supply.

1.2.2 The strategic target is composed of the housing supply target of at least 39,310 new homes between 2015 and 2025 – established in the London Plan – and a rolled-forward target of at least 3,931 new homes per year between 2026 and 2031.

1.2.3 Part (d) of the Policy S.H1 sets out that this will in part be achieved through housing estate regeneration schemes delivering homes.

1.2.4 The delivery of housing, and particularly affordable housing, is a priority in the borough. The re-provision of the existing homes and intensification of the residential use with the provision of additional units is consistent with S.H1.

1.3 *Community Use*

1.3.1 Local Plan Policy S.CF1 supports proposals which seeks to protect, maintain and enhance existing community facilities and makes clear there is a presumption against the loss of community facilities to ensure that there is sufficient provision to meet local needs.

1.3.2 Policy D.CF2 (Part 1A) advises that existing community facilities should be retained, unless it can be demonstrated that: a) there is no longer a need for the facility or an alternative community use within the local community, or, b) a replacement facility of similar nature that would better meet the needs of existing users is provided. The policy also states that where community facilities are re-provided on site as part of any new development, the quality and accessibility of these facilities (including public access) should be enhanced. Specifically, in the context of estate regeneration schemes, Policy D.H2 (Part 5) also requires existing community facilities to be protected and enhanced.

1.3.3 The demolition of the existing RCCM and the provision of a new larger and fit-for- purpose community space, meets the requirements of policy and would

ensure that all of the community facilities currently within the Estate either have a new space re-provided on site or access to an alternative community space within the local community.

2 **Housing (affordable housing, housing mix, housing quality, fire safety, amenity) - Local Plan policies: S.H1, D.H2, D.H3**

2.1 Local Plan policy D.H2 part 5 provides criteria which estate regeneration schemes are required to follow: A - protect and enhance existing open space and community facilities B - protect the existing quantum of affordable and family units, with affordable units re-provided with the same or equivalent rent levels. C - provide an uplift in the number of affordable homes, and D - include plans for refurbishment of any existing homes to the latest decent homes standard.

2.2 Local Plan Policy D.DH2 also seeks to secure a mixture of small and large housing that meet identified needs which are set out in the Council's most up-to-date Strategic Housing Market Assessment (2017).

2.3 The existing 100 homes on the site comprise of 32 x 2 bedroom homes, 60 x 3 bedroom homes and 8 x 4 bedroom homes. When the proposed housing mix inclusive of the re-provided homes is considered against the policy requirements set out in D.H2 there is a general conformity.

2.4 The Scheme implemented by way of the Planning Permission would deliver 63% of family sized homes within the affordable rented tenure and 56% in the Intermediate tenure. Within the market housing there would be an under provision of family sized homes and an overprovision of one bed and two bed units. However, given there is an overprovision of family sized homes within the intermediate and social rented housing, where there is the greatest need, the housing mix and tenure are considered acceptable.

2.5 The uplift scheme, which is the housing mix excluding the re-provided homes, would deliver 60% family sized units in the affordable rented tenure. Within the Intermediate tenure there would be an under provision of family sized homes and an overprovision of one bedroom and two-bedroom units.

2.6 At the time of determination, significant weight was given to the re-provision of all of the existing Social Rented and intermediate tenure homes and the focus on delivering a large portion of family sized homes, particularly affordable homes within the proposed scheme. The proposed housing mix and tenure are considered acceptable.

2.7 *Affordable Housing*

2.7.1 Local Plan policy S.H1 part 2 A (i) sets an overall strategic target of 50% of all new homes to be affordable, through securing affordable homes from a range of council- led initiatives.

2.7.2 Local Plan policy D.H2 sets the requirements of affordable housing provision within development in the Borough, in terms of quantum, standard and provision. Development is required to maximise the provision of affordable housing with a 70% affordable rented and 30% intermediate tenure split (Para. 9.30 making clear that rented housing is expected to be 50% London Affordable Rent and 50% Tower Hamlets Living Rent).

2.7.3 Tower Hamlets Local Plan Policy D.H3 requires development to provide affordable housing which is not externally distinguishable in quality from private housing.

2.7.4 Of the total 407 units, the Scheme would provide 53.3% (by habitable room) affordable homes, inclusive of the re-provided homes. The Scheme would provide an uplift of 40.5% affordable housing, excluding the re-provided homes. Within the affordable rent tenure, the proposals include the re-provision of 36 homes and the additional provision of 91 units. The re-provided homes would retain the existing Social Rent structure. The additional affordable rented homes would be provided along an 82:18 Tower Hamlets Living Rent to London Affordable Rent split by habitable room. While this does not align with the policy requirement for a 50:50 split between the two, the approach is considered acceptable, given the very strong overall affordable housing provision and based on the outcome of the FVA.

2.7.5 Within the intermediate tenure, the proposals include the provision of 28 ‘shared equity’ re-provided ‘Resident Leaseholder’ homes and the provision of an additional 20 shared ownership units.

2.7.6 The proposed tenure split between affordable rent and intermediate tenure for the additional residential units equates to 82:18 in favour of affordable rent by habitable room. Whilst this does not strictly conform to the Council's policy guidance of 70:30 the overprovision of affordable rented units is welcome in this instance, given the acute demand for this type of housing and the development does deliver a range of tenure types and unit sizes.

2.7.7 The affordable homes (affordable rent and intermediate tenure) would be provided in separate blocks to the market homes. However, the blocks would be spread across the development and all amenity spaces would be shared between all residents. The housing development would be tenure blind, in terms of the external and internal design quality of the blocks, which is secured by condition through the submission of materials.

2.7.8 London Plan policy D7 and Local Plan Policy D.H3 require residential developments that at least 10% of dwellings must meet Building Regulation M4 (3) ‘wheelchair accessible dwellings’ and the remainder of dwellings to meet M4 (2) ‘accessible and adaptable dwellings’.

2.7.9 The proposed development would provide 34 wheelchair accessible dwellings, which would comprise 10% of the additional dwelling provision compliant with the above policies.

2.7.10 Policy D.H3 requires developments to meet the most up-to-date London Plan space standards and provide a minimum of 2.5m floor-to-ceiling heights. The development meets these requirements.

2.7.11 Private amenity space requirements are determined by the predicted number of occupants of a dwelling. Local Plan Policy D.H3 sets out that a minimum of 5sqm is required for 1-2 person dwellings with an extra 1sqm provided for each additional occupant. All units would have private amenity space provision that meets minimum standards.

2.7.12 Local Plan Policy D.ES2 requires development to be at least 'Air Quality Neutral' and calls on air quality impacts to identify any necessary mitigation for developments that would cause harm to air quality.

2.7.13 The Planning Application was supported by an 'Air Quality Assessment' prepared by Create Consulting Engineers. The Councils Air Quality officer confirmed that the Air Quality Assessment and Air Quality Neutral Assessments are satisfactory. The Planning Permission is subject to conditions relating to the construction and operational phases of the development, and as such the proposal would not subject the future occupiers to poor air quality and would not result in undue dust or air quality impacts during demolition or construction.

3 **Design and Heritage (layout, townscape, massing, height, appearance, materials, heritage) – Local Plan policies: S.DH1, D.DH2, S.DH3, D.DH4, D.DH6, D.DH7.**

3.1 Local Plan policy S.DH1 outlines the key elements of high-quality design so that proposed developments are sustainable, accessible, attractive, durable and well-integrated into their surroundings. Complementary to this strategic policy, Local Plan policy D.DH2 seeks to deliver an attractive, accessible and well-designed network of streets and spaces across the borough.

3.2 The proposed development is of an acceptable height, scale and massing. The overall distribution of height responds positively to the surrounding context.

3.3 The character and appearance of the proposed development will vary slightly across the site responding to the location, use, the character of the proposed new street and proposed public realm. The scheme includes good design features, and would create a good quality and detailed development that would fit reasonably within the surrounding built context. Local Plan Policy S.DH3 require developments affecting heritage assets and their settings to conserve their significance, by being sympathetic to their form, scale, material and architectural detail.

3.4 No harm has been identified to designated or non-designated heritage assets in the vicinity of the site.

3.5 Amenity (privacy, outlook, daylight and sunlight, noise, construction impacts) - Local Plan policies: D.DH8

3.6 Policy D.DH8 seeks to protect neighbouring residential amenity by safeguarding privacy, not creating unacceptable levels of noise, disturbance or sense of enclosure and ensuring acceptable daylight, sunlight and outlook to neighbouring homes.

3.7 In accordance with Policy D.DH8, a distance of approximately 18 metres between windows of habitable rooms would reduce inter-visibility to an acceptable degree. There would be at least an 18-metre separation distance between all windows in the development.

3.8 The proposed development would result in some adverse daylight and sunlight impacts to neighbouring properties, with some noticeable reductions in daylight and sunlight. Any scheme of this type, involving the densification and optimisation of an existing site, would inevitably lead to some level of adverse impacts.

3.9 In addition and in compliance with the Mayor's Housing SPG, the target values within the BRE Guide should be viewed flexibly, to fully optimise the potential of the site to provide housing. Overall, it is considered that the development would not result in any unacceptable adverse impacts on daylight, sunlight or overshadowing to neighbouring occupiers.

4 **Transport (sustainable transport, highway safety, car and cycle parking, servicing) - Local Plan policies: S.TR1, D.TR2, D.TR3, D.TR4**

4.1 Local Plan policies promote sustainable modes of travel and limit car parking to essential user needs. They also seek to secure safe and appropriate servicing.

4.2 The layout and public realm of the development has been designed to encourage walking and cycling and there is a clear pedestrian route through the site.

4.3 The development would not result in adverse impacts to the existing highway network, and servicing and delivery plans are secured by condition to ensure suitable arrangements.

5 **Environment (air quality, biodiversity, contaminated land, flooding and drainage, energy efficiency, noise, waste) - Local Plan policies: S.ES1, D.ES2, D.ES3, D.ES4, D.ES5, D.ES6, D.ES7, D.ES8, D.ES9, D.MW3**

5.1 Policy D.ES3 requires major development to deliver net gains in biodiversity that contribute to objectives in the Local Biodiversity Action Plan.

5.2 The biodiversity enhancements as part of the proposed development include the provision of blue and green roofs over the roofs of the new buildings and ground level landscaping. This would be a net gain in biodiversity as a result of the development as required by D.ES3.

5.3 Biodiverse roofs, as well as other biodiversity enhancements such as nectar rich plants, bat boxes and native tree species are secured via condition. These will all contribute to Local Biodiversity Action Plan targets.

5.4 Local Plan policies D.ES4 and D.ES5 seek to manage flood risk and encourage the use of Sustainable Urban Drain is protected to a very high standards by the Thames tidal flood defences up to a 1 in 1000 (0.1%) change in any given year. Policy D.ES6 requires new development to minimise the pressure on the combined sewer network.

5.5 The flood risk and drainage strategy submitted with the application was considered acceptable in principle, with full details secured via condition.

5.6 Policy D.ES8 seeks to protect the health of the borough's residents and workers and the environment from contaminants and hazardous substances.

5.7 The preliminary contaminated land assessment was considered acceptable. Conditions were imposed to secure full contamination and remediation investigations and mitigation.