



### **Contents**

Foreword	4
Introduction	6
The Proposed Development	6
Estate regeneration context	7
Tall buildings and policy	8
Introduction	8
Site context	9
A changing context	14
Adopted policy: London Plan	18
Adopted policy D.DH6 Part 1	22
Adopted policy: D.DH6 Part 3	28
Emerging policy: Tall Buildings SPD	42
Summary	50

4

#### Please note:

- All references to the Design and Access Statement: The Masterplan refer to Revision B dated August 2022, which must be read in conjunction with the Addendum document (Revision E) dated November 2023.
- All references to the Design and Access Statement: Detailed Proposals refer to Revision B dated October 2022 and must be read in conjunction with its Addendum Revision B dated November 2023.
- All references to the Parameter Plans refer to Revision 3 dated September 2023.
- All references to the Design Code refer to Revision D dated November 2023.
- For other supporting documents please refer to the most recent revision as set out in the Planning Application Documents and Drawing Schedule dated November 2023, prepared by DP9.

Foreword

This Tall Buildings Statement has been prepared by Levitt Bernstein, DP9 Ltd, KM Heritage and The Townscape Consultancy, and is submitted in support of a hybrid planning application for the Aberfeldy Village Masterplan. The hybrid planning application is made in relation to the north of East India Dock Road (A13), east of the Blackwall Tunnel Northern Approach Road (A12) and to the south west of Abbot Road (the "Site") on behalf of The Aberfeldy New Village LLP ("The Applicant"). The hybrid planning application is formed of detailed development proposals in respect of Phase A for which no matters are reserved ("Detailed Proposals"), and outline development proposals for the remainder of the Site, with all matters reserved ("Outline Proposals"). The Detailed Proposals and Outline Proposals together are referred to as the "Proposed Development".

The Proposed Development comprises the comprehensive redevelopment of the Site. The Proposed Development will provide new retail, workspace and community floorspace along with residential dwellings and the pedestrianisation of the A12 Abbott Road vehicular underpass to create a new east to west route. The Proposed Development will also provide significant, high quality public realm, including a new Town Square, a new High Street and a public park.

Following submission of the Hybrid Application in October 2021, the Applicant and LBTH officers jointly agreed that the works to Jolly's Green should be included within the red line and secured as part of the future planning permission. The Applicant has updated the red line and amended the Proposed Development to incorporate the provision of a direct link from the proposed pedestrianised underpass to Jolly's Green. The extension of the redline boundary does not result in any fundamental alterations to the development that is proposed. Updated planning documents were submitted in August 2022 reflecting this change, with a further amendment made in January 2023 to remove building A3 from the masterplan.

In summer 2023, the scheme was amended to include second stairs to all buildings over 18m following the publication of the Government's Long Term Plan For Housing. The Applicant has updated the planning application plans and documents where necessary to reflect these changes.

The purpose of the Tall Buildings Statement is to demonstrate that the overall heights strategy for the Proposed Development, which includes tall buildings, responds appropriately to responds appropriately to the London Plan's Policy D9, and the London Borough of Tower Hamlet's (LBTH) policy and guidance. This Tall Buildings Statement provides a detailed assessment and commentary of the policy, and is submitted in support of both the Outline Proposals, where the majority of tall buildings lie, and the Detailed Proposals.

It has been over a decade since the Aberfeldy New Village LLP, the joint-venture partnership between Poplar HARCA and EcoWorld London secured planning permission for a residential led mixed-use regeneration of the Aberfeldy Estate, an area with some of the starkest inequalities in the UK.

Since 2012, the Applicant has delivered 911 new homes offering a range of mixes and tenures, as well as new and highly valued green spaces, such as East India Green, and upgraded health and community facilities. The last phase of the previously approved Aberfeldy Village Masterplan is now complete, and provides a new public square, shops, a café and new homes.

Due to the success of Aberfeldy Village, The Applicant has been consulting over the last four years on a new and even more ambitious masterplan for the wider Aberfeldy area, reflecting the changing nature of the area and shifting priorities towards the environment and neighbourhood living. These plans have been subject to extensive engagement with the local community, including reaching out to and involving young people in the design process. In Autumn 2020, the regeneration plans were resoundingly endorsed in an estate ballot, with 93.1% of residents in favour on a 91.1% turnout.

The new Aberfeldy Village Masterplan presents a unique opportunity to secure significantly improved infrastructure and facilities that will benefit the wider Poplar community, as well as increase the overall number of new homes to be delivered, including high quality new affordable homes for existing residents.

Crucially, the Aberfeldy Village Masterplan seeks to address and tackle the wider strategic challenges facing the area, notably poor connectivity that contributes significantly to stubborn social and economic inequalities, as well as a lack of high-quality and well-maintained open spaces. At the heart of the proposals are plans to repurpose the existing vehicular underpass, creating a safer and greener pedestrian and cycling connection - the Underbridge - beneath the A12, helping to connect local communities via a new green corridor stretching from Langdon Park in the west to Braithwaite Park and the new Poplar Riverside in the east. These new, safer, greener pathways will significantly improve connectivity across this part of East London, helping to unlock its exciting potential.

The Aberfeldy Village Masterplan sets out to deliver a substantial package of benefits for existing residents and the wider Poplar area. The plans have been shaped by the local community and reflect their desire for new homes, more attractive open spaces, safer streets, a stronger retail offering and upgraded community facilities. The Applicant is confident that the Proposed Development will match and exceed these expectations.



Introduction <sup>6</sup>

#### The Proposed Development

The Aberfeldy New Village LLP have successfully delivered phases 1, 2, 3A and 3B of the previously approved Aberfeldy Village Masterplan.

Aberfeldy Village is located in Poplar, East London, around one mile away from Canary Wharf. The Site is bounded on all three sides with the A12 Blackwall Tunnel to the west, the A13 East India Road to the south and Abbott Road to the north east. These features have isolated the Aberfeldy Estate despite its proximity to central London. Poplar is undergoing significant regeneration and as a result, the planning context for the area is changing. This is a crucial consideration in the revision and expansion of the previously approved Aberfeldy Village Masterplan.

The Proposed Development would realise the regeneration of the Site and secure growth on a strategic scale, on one of London's most important brownfield sites. The development will bring about a range of social, economic, and environmental benefits and will fulfil the potential of the Site as an Opportunity Area, Housing Zone and Neighbourhood Centre.

The development would result in a substantial number of new homes of different sizes and tenures, including new affordable homes which will contribute significantly to the London Borough of Tower Hamlets' and London's housing need requirements.

Fig.3 Phases 1-3 of the previously approved Aberfeldy Village Masterplan

#### Estate regeneration context

The Proposed Development constitutes complex estate regeneration, and the local and strategic policy requirements as they relate to estate renewal are intrinsically linked to all aspects of the proposal, including overall scale of development. Notwithstanding our belief that the Proposed Development aligns with the LBTH's policies on tall buildings, it is vital that any discussion on scale is held within the context of what is a challenging policy to deliver, on a Site that has well documented viability issues.

In accordance with local and strategic policy requirements on estate regeneration, the proposals are predicated on full replacement of existing affordable rent floorspace. Any additional affordable housing provision is to be determined through a Financial Viability Assessment to represent the maximum reasonable level and therefore deliverability is key to the proposals.

It is essential that the Proposed Development provides the much-needed replacement affordable homes and addresses the area's significant infrastructure requirements to support regeneration. This requires development of scale, with a considerable number of market homes to cross-subsidise the delivery of the replacement affordable rent accommodation and additional affordable housing provision.

However, notwithstanding the inherent complexities of this estate regeneration project, and the challenging viability context, it remains that the overall heights strategy for the Proposed Development, which includes tall buildings, fully align with LBTH's policy and guidance. In order to assist the Council in its assessment of the proposed tall buildings, a detailed commentary is provided in this document.



Fig.4 Aberfeldy Street today

#### Introduction

The Proposed Development has been arrived at following a detailed and comprehensive assessment of the existing Site and its existing and emerging context. Careful attention has been paid to the Site's immediate surroundings and wider context, particularly in regard to neighbouring heritage assets, key townscape views and lower scale residential development neighbouring the Site.

Throughout the Pre-Application process LBTH acknowledged that the scheme responds well to its context and that they were content with the Proposed Development's relationship with Balfron Tower. Officers recognised that the Site is suitable for tall buildings, notably as the draft Leaside Area Action Plan allocates Aberfeldy as a site for regeneration, and were in agreement that the taller elements are best suited to the north, as proposed.

This Tall Buildings Statement demonstrates the suitability of the proposed height, specifically in relation to the proposed 28 storey building at Highland Place. Unless stated otherwise, any building heights used in this document correspond to the maximum parameter scheme for the Outline Proposals and the proposed building heights for the Detailed Proposals (Phase A). Where imagery supports the detailed assessment and commentary of the policy, the illustrative scheme for the Outline Proposals is used.

Further information on the maximum parameters is set out in the **Parameter Plans** prepared by Levitt Bernstein.

Information on the proposed building heights for the Detailed Proposals is included in the **Design and Access Statement: Detailed Proposals** and **Application Drawings** prepared by Morris +Company.

A Built Heritage Assessment prepared by KM Heritage and a Townscape and Visual Impact Assessment prepared by The Townscape Consultancy have been undertaken in support of this hybrid planning application.



Fig.5 Aerial view showing the Site

#### Site context

As part of the overall assessment of a Proposed Development which includes tall buildings, it is important to begin with an understanding of the Site and its immediate surroundings.

The Site is located in an area that is marked with a range of existing buildings, with heights rising to 27 storeys within the vicinity of the Proposed Development. Unbuilt phases of the extant permission include AOD heights on the parameter plans which would allow for building heights of up to 41m AOD. This sets a precedent for tall buildings at this location.

Located within the Site is a Neighbourhood Centre, as defined in LBTH's Town Centre Hierarchy. The Site is located within the Poplar Riverside Opportunity Area as designated in the London Plan (2021) which identifies the Site as a significant location with development capacity to accommodate new housing, commercial development and infrastructure. The Site has a PTAL of 3-4 which represents good accessibility.

The Site is not located within a conservation area, and does not include any listed buildings. However, the Site is near to the Balfron Tower Conservation Area and several statutorily listed buildings, most notably Balfron Tower (Grade II\*) which is also identified as a Local Designated Landmark in the Local Plan.

The Local Plan also introduced two Borough views which cover part of the Site: View 6 – 'View from East India Dock Road to Balfron Tower & Canary Wharf in the background' and View 5 – 'View from Langdon Park to Balfron Tower & Canary Wharf in the background'.

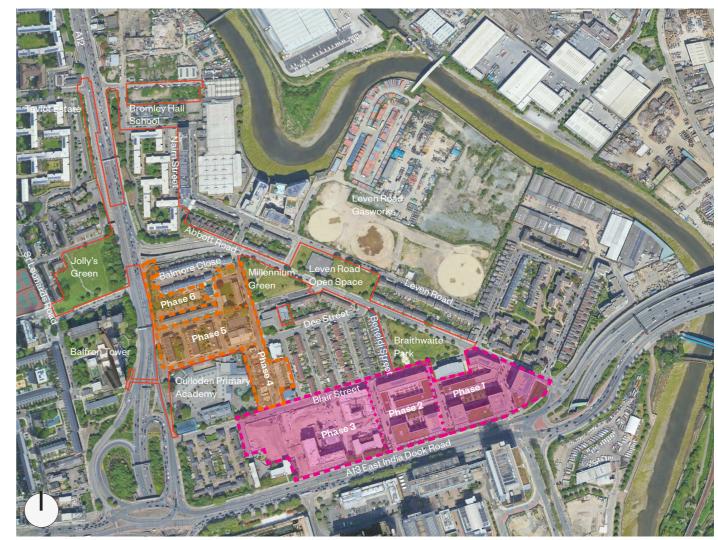


Fig.6 Site location plan showing Aberfeldy Village Phases 1-3

### Site context

Images of the Site and its immediate surroundings are shown across the following pages.







Fig.8 Jolly's Green



Fig.9 Poplar Works



Fig.10 CGI of the now completed Aberfeldy Square in Phase 3B of the previously approved Aberfeldy Village Masterplan

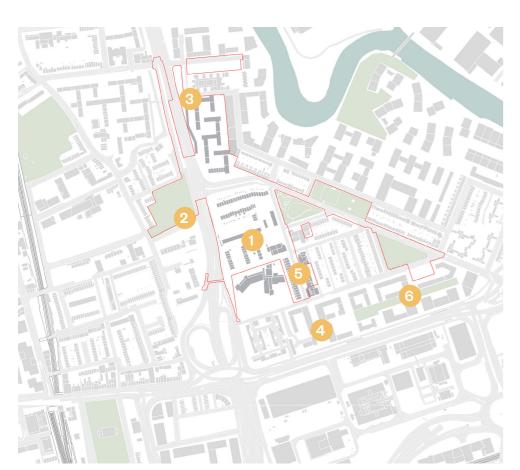


Fig.11 Key location plan



Fig.12 Aberfeldy Street



Fig.13 Aberfeldy Village Phases 1-3 and East India Green

### Site context



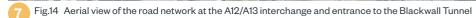




Fig.15 CGI of the emerging Poplar Riverside Park and Leven Road Gasworks development



9 Fig.16 CGI of proposals for the Chrisp Street Market



Fig.17 Views to the Lea River. Emerging bridges will improve connections across the river to the Leaway.

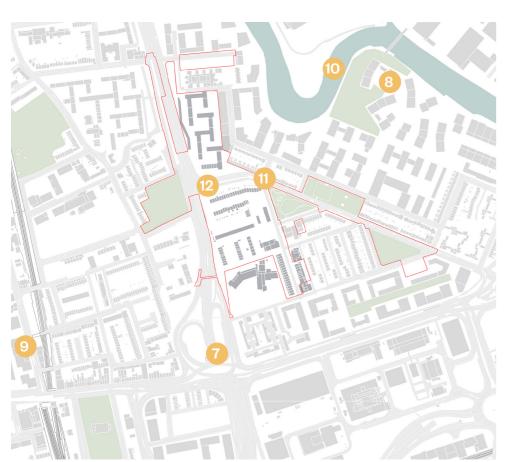


Fig.18 Key location plan



Fig.19 Vehicular underpass along Abbott Road crossing the A12. This creates a barrier between Aberfeldy Estate to the south and Nairn Street Estate to the north.

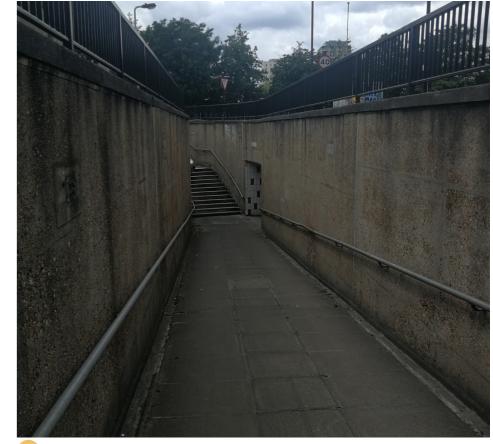


Fig. 20 The pedestrian underpass through to Jolly's Green is in poor condition and can feel unsafe

### A changing context

Various developments and connections are emerging in close proximity to the Site. Whilst these are at varying stages in the planning process, they will significantly change the context of the Site. They present an exciting opportunity for the Site to stitch into these initiatives and benefit the wider neighbourhood.

Both Newham and Tower Hamlets are working together to consider the wider Lea River Park, aiming to aid regeneration and address the acute lack of public open space within the area. The contribution of the Aberfeldy Village Masterplan is an important consideration.

The diagram opposite highlights the wider network of development sites coming forward and those which have proposed built form footprints. It also maps the proposed bridges coming forward along the River Lea which will dramatically improve the east-west connectivity of the area. Lochnagar Bridge, Poplar Reach Bridge and Mayer Parry Wharf Bridge are of particular importance to the new Aberfeldy Village Masterplan and will allow connectivity to Poplar Riverside Park, the Lea River Park, the Leaway and other local centres.



Crossings to be improved and made pedestrian focused



Fig.21 Diagram showing emerging connections and development

### A changing context

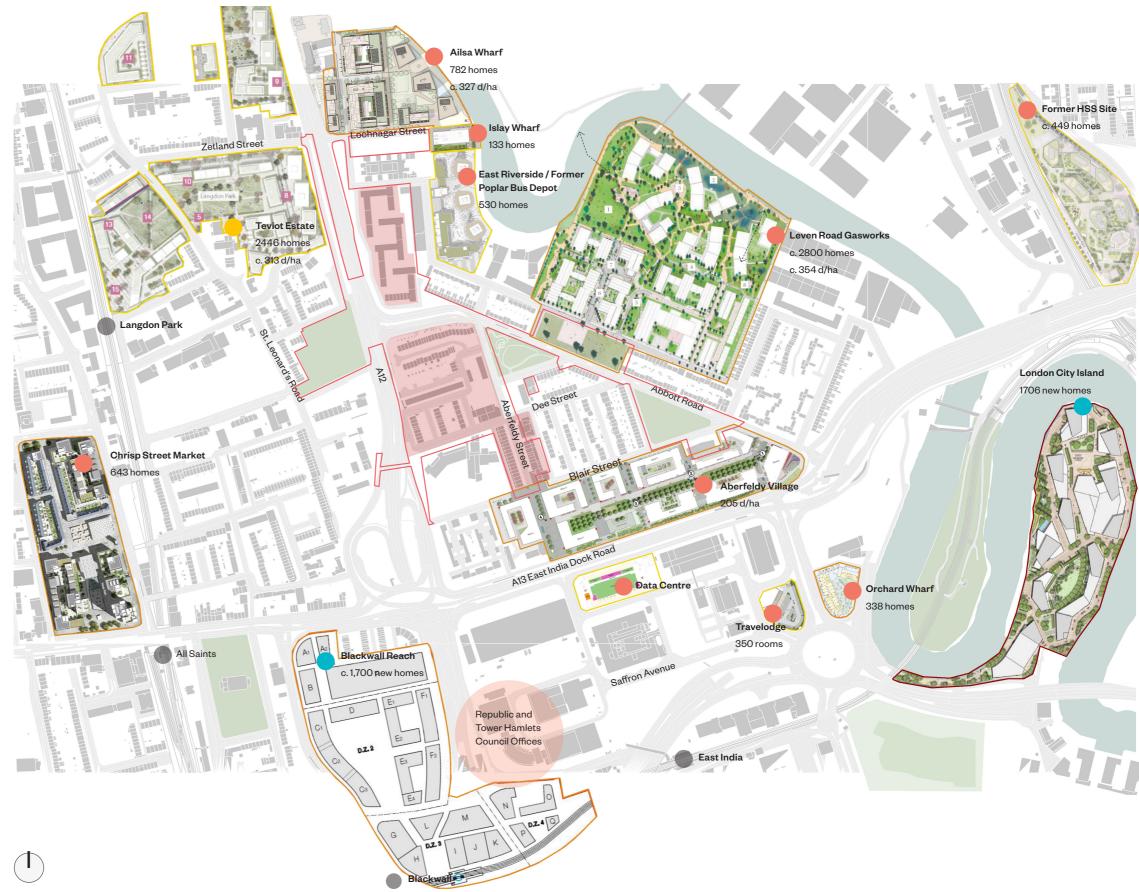
Tower Hamlets, and in particular the area around the previously approved Aberfeldy Village Masterplan and along the River Lea, is changing rapidly and will continue to change as a result of the new and emerging development in the Leaside area which surrounds the Site

The diagram opposite shows some of the new emerging developments, some of which have gained planning approval.

With these new and emerging developments, and in addition to those which are already built, there will be an increase in population in the area which will require better quality public realm, open spaces and a larger, more improved offer of non-residential uses alongside other strategic infrastructure including improved pedestrian and cycle connections.

This changing context has informed the Proposed Development in terms of its layout, proposed massing, land use and movement and open space strategy. By responding to this changing surrounding context, it will help to create an active, liveable and well connected neighbourhood which responds to the needs of the community both now, and in the future for many years to come.

Pre planning





### Adopted policy: London Plan

The London Plan's (2021) Policy D9 provides strategic guidance for tall buildings in London. The policy states that boroughs should determine if there are locations where tall buildings may be an appropriate form of development, subject to meeting the other requirements of the Plan.

Tower Hamlets Local Plan Policy D.DH6 directs tall buildings to designated Tall Building Zones (Aldgate, Canary Wharf, Millwall Inner Dock, Blackwall and Leamouth). Outside of these zones, Part 3 of the policy makes clear that tall building proposals will be supported provided they meet the general criteria set out in Part 1 of the policy and the four specific criteria set out in Part 3 of the policy. An assessment of the proposal against Tower Hamlets policy on tall buildings is provided within this document from page 22 onwards. The conclusion of this assessment is that the Site is suitable for tall buildings in line with LBTH's Local Plan policy. Thus it is recognised as a suitable location for tall buildings in a Development Plan and is in accordance with London Plan Policy D9.

The London Plan (2021) in its supporting text for Policy D9 notes that in large areas of extensive change, such as Opportunity Areas, the threshold for what constitutes a tall building should relate to the evolving, not just the existing, context. The evolving context is detailed on page 12 of this document. The adjacent diagram shows the maximum parameter building heights for the Outline Proposals and the proposed building heights for the detailed proposals. The AODs of the illustrative scheme for the Outline Proposals are also provided in brackets. Refer to parameter drawings for further detail.

+ 59.9m () AOD of the Proposed Development

Maximum Parameter AOD (Illustrative Scheme AOD)

AOD of surrounding tall buildings (existing and proposed)

+ 59.9m



Fig.23 Diagram showing the Proposed Development, emerging context and associated AODs

## Adopted policy: London Plan

Policy D9 of the London Plan requires that long-range, midrange and immediate views are given careful consideration in the design of tall buildings. The testing of views has formed a key part of the pre-application process and influenced the heights strategy. These views are illustrated on this page.

The London Plan (2021) Policy D9 also sets out criteria against which development proposals should be assessed and these include visual, functional and environmental impacts. For the avoidance of repetition these will be dealt with in response to Tower Hamlets Local Plan Policy D.DH6 on page 22 onwards.



Fig.24 View looking west along Dee Street towards Locally Designated Landmark Balfron Tower



Fig.25 LBTH Borough view 6: View from East India Dock Road to Balfron Tower and Canary Wharf in the background



#### Adopted policy: LBTH D.DH6 Part 1

#### Introduction

The assessment of the acceptability of tall buildings on the Site should be grounded in planning policy terms and, as such, is to be based on the criteria established in Policy D.DH6.

Policy D.DH6 establishes two sets of criteria applicable to this Site, Part 1 and Part 3. Part 1 comprises a series of 12 criteria, a number of which relate to the detailed design of buildings. The criteria, and an assessment of the Proposed Development, are provided across the following pages.

a. Be of a height and scale, mass and volume that are proportionate to their role, function and importance of the location in the local, borough-wide and London context; and take account of the character of the immediate context and of their surroundings.

Located within the Site is a Neighbourhood Centre as defined in the Council's Town Centre Hierarchy. A fundamental part of the Proposed Development will be the delivery of a new Neighbourhood Centre and a new employment district, Enterprise Yard, which will be vibrant and have high levels of pedestrian activity, encouraged through the density provided by tall buildings.

The Site is located within the Poplar Riverside Opportunity Area, an area already characterised by tall buildings, and as noted in the London Plan (2021) what constitutes a tall building should thus relate to the evolving context.

The tall buildings respond directly to the townscape, respecting both the existing hierarchy and the evolving context. They will enhance the legibility of the area at a new key east-west route, delivered as part of the Aberfeldy Village Masterplan as well as signalling the significant regeneration of Aberfeldy, a major estate regeneration scheme.

The buildings are of a height and scale proportionate to the importance of the area undergoing transformation and the extent of the regeneration proposal. They are reflective of both their existing and evolving context.

**b.** Achieve exceptional architectural quality and have innovative and sustainable building design, using robust and durable materials throughout the building.

Buildings will be of the highest architectural quality. The Aberfeldy Village Masterplan will build upon the positive change already instigated in the early phases of the Extant Permission which show the Applicant's clear commitment to delivering high quality design and placemaking. The quality of design, including the use appropriate high quality materials, is secured through the Design Code which forms part of this application. Sustainability has been considered throughout the design process and will be central to the development of detailed design proposals.

The design quality is demonstrated within the Design and Access Statement: The Masterplan prepared by Levitt Bernstein and the Design and Access Statement: Detailed Proposals prepared by Morris + Company, and the principles outlined within the Design Code and Parameter Plans prepared by Levitt Bernstein which have all been submitted as part of this hybrid planning application.



Fig.27 Plinth incorporating new workspace defines character of Enterprise Yard and activates public realm

c. Enhance the character and distinctiveness of an area without adversely affecting designated townscapes and landscapes (including building/roof lines) or detracting from important landmarks, heritage assets, key views and other historic skylines, and their settings.

The Proposed Development has been designed to respond to the historic context, particularly Balfron Tower and the Balfron Tower Conservation Area. Decisions on massing, architectural approach, and the preservation of key views have been informed through collaboration with officers.

A Built Heritage Assessment and a Townscape and Visual Impact Assessment have been undertaken to demonstrate that the proposed tall buildings do not harm the settings of any designated or non-designated heritage assets. These are submitted in support of this hybrid planning application.



Fig.28 View west along Dee Street towards Balfron Tower

## **d.** Provide a positive contribution to the skyline during both the day and night time.

The Proposed Development will provide variety, interest, and architectural quality to a skyline already characterised by tall buildings. Proposed tall buildings will be designed to be responsive to the local context and mark a dramatically improved pedestrian connection from Abbott Road to the west of the A12.

The contribution of the scheme to the skyline is demonstrated as part of the Townscape and Visual Impact Assessment, prepared by The Townscape Consultancy which has been submitted as part of this hybrid planning application. The baseline photography was taken during daylight hours. It is considered that the appearance of the Proposed Development at night would be consistent with that of other existing developments in the local area, and separate night time AVRs are not provided.



 $Fig. 29\ \ View\ along\ Abbott\ Road\ showing\ the\ tall\ building\ cluster, and\ its\ skyline, marking\ the\ transformed\ vehicular\ underpass$ 

#### Adopted policy: LBTH D.DH6 Part 1

**e.** Not prejudice future development potential of adjacent/neighbouring buildings or plots.

The Proposed Development has been carefully designed to consider its relationship with its existing context, not least

adjoining sites. The Applicant has explored how underutilised adjacent land can be integrated through comprehensive land assembly discussions. Where this has not been feasible, the Proposed Development has been designed to facilitate the future redevelopment of this land.



 $Fig. 30 \ \ Aerial \ sketch \ of the \ illustrative \ masterplan \ in \ its \ surroundings$ 

**f.** Maintain adequate distance between buildings to ensure a high-quality ground floor experience and enhanced residential environment.

The tallest elements in the Proposed Development are located away from the edges of the Site to preserve the residential quality of the neighbouring homes. Proposed tall buildings are positioned a minimum of 25 metres from one another and orientated to minimise overlooking to ensure that internal spaces in the new homes are of the highest quality.

The ground floor is activated by a mix of non-residential uses, predominantly workspace and retail, and the landscape and public realm design is of the highest standard.



Fig.31 View from the balcony of a proposed tall building

g. Demonstrate consideration of public safety requirements as part of the overall design, including the provision of evacuation routes.

The Proposed Development has been designed in line with relevant planning policies and building regulations, and with the advice of specialist consultants to ensure that consideration has been given to public safety.

The fire engineers, Elementa, have been part of the design team from an early stage and provided Fire Statements in accordance with London Plan Policy D12. The Phase A and illustrative schemes have now been updated to include second stairs to all buildings over 18m, reflecting the most recent draft guidance (Draft BS:9991), the latest GLA requirements and the government's Long Term Plan for Housing.

Fire statements for both the Detailed and Outline Proposals have been updated as pat of this submission, these conclude that adequate measures are provided to meet the functional requirements of the Building Regulations.

All outline phases will be subject to future Reserved Matters Applications, which will respond to the relevant fire safety legislation and guidance in place at that time

The design quality is demonstrated within the Design and Access Statement: The Masterplan prepared by Levitt
Bernstein and the Design and Access Statement: Detailed
Proposals prepared by Morris + Company, and the principles
outlined within the Design Code and Parameter Plans prepared
by Levitt Bernstein which have all been submitted as part of
this hybrid planning application.

h. Present a human scale of development at street level and comprise an attractive and legible streetscape that takes into account the use of the public realm for a variety of users and includes active uses at ground floor level.

Plinths are proposed at the bases of buildings on Enterprise
Yard and the High Street. Setting back the residential buildings
above will reduce the perception of height at street level.
Through changes in material and architectural expression,
these plinths will define an active ground floor.

Existing trees have been retained where possible, and new tree planting will also contribute to a human scale at street level.

Careful consideration has been given to maximising active frontages. Through the provision of new high quality spaces, Aberfeldy Street will be rejuvenated as a retail street appropriate to a Neighbourhood Centre, as is its designation. The Proposed Development will provide a new 'Enterprise Yard' running parallel to the A12. Characterised by small and medium sized commercial and maker-spaces, this area will build on the success of Poplar Works at the north of the Site.



 $Fig. 32 \ \ Active \ uses \ at the \ ground \ floor \ of \ residential \ buildings$ 



Fig.33 Section through Enterprise Yard showing the continuation of Poplar Works maker-spaces opposite a residential building with a plinth activating the ground floor and homes set back above

#### Adopted policy: LBTH D.DH6 Part 1

i. Provide high quality private and communal open space and play areas (where residential uses are proposed) which local residents can use and that encourage social cohesion.

The Proposed Development includes a comprehensive landscape and play strategy. This includes up to 4,574 sqm of communal amenity space and up to 3,573 sqm of open space, including Highland Place which is a piece of strategic infrastructure for the local community.

To encourage social cohesion, play spaces of a variety of scales, from doorstep to local and neighbourhood offers, are carefully designed to sit within the public realm, providing high quality routes and spaces for new residents and the wider community. The thresholds between public and private spaces are carefully considered and balanced to offer a variety of usable spaces for people of all ages. Improvements to the existing open spaces of Leven Road Open Space and Braithwaite Park are also proposed in collaboration with Aberfeldy Big Local, who led on community engagement and the design brief for these spaces.

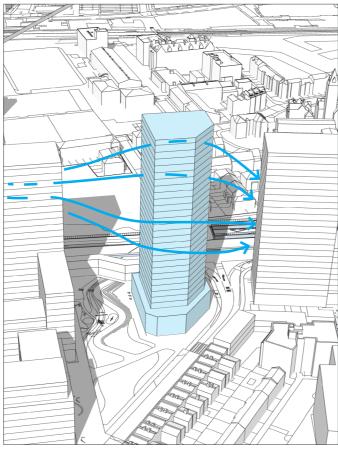


Fig.34 Illustration of private amenity space outside homes along Community Lane, which open onto a communal play street

**j.** Demonstrate that the development does not adversely impact on the microclimate and amenity of the Site and the surrounding area.

Careful consideration has been given to microclimate and amenity and the design has developed in response to the recommendations of specialist consultants to ensure that a pleasant environment can be provided within the Site and to minimise impact on the surrounding area.

The hybrid planning application is supported by an Environmental Statement, prepared by Trium, which assesses the Development's impact on microclimate.



 $\label{eq:Fig.35} Fig. 35 \ \ Building form \ maximises \ distances \ to \ adjacent \ buildings \ and \ mitigates \ effects \ of \ wind \ channelling$ 

**k.** Demonstrate that the development does not adversely impact on biodiversity and open spaces, including watercourses and water bodies and their hydrology.

The Proposed Development and landscape proposals have been designed to integrate and improve existing open space, to avoid adverse impacts on biodiversity and, where possible, to enhance it. Further information is provided in the Biodiversity Impact Assessment carried out by Greengage.

A proposed surface water drainage strategy for each phase has been developed to utilise sustainable drainage techniques (SuDS) to attenuate surface water at source and reduce the risk of downstream flooding of the Thames Water sewer network in the local area. Further information is provided in the Below Ground Drainage Strategy prepared by Meinhardt.



Fig.36 A landscape strategy which considers sustainable urban drainage and promotes biodiversity

I. Comply with Civil Aviation requirements and not interfere to an unacceptable degree with telecommunications television and radio transmission networks and river radar equipment.

The Environmental Scoping Opinion written by LBTH and dated 08.09.2021 notes that the Site is approximately 3km to the north west of London City Airport, and due to the proposed height it is not anticipated to affect the current use of approach

and/or departure procedures for London City Airport and it was agreed that aviation could be scoped out of the Environmental Assessment.

Both London City Airport and National Air Traffic Services (NATS) will be consulted on during the determination of the hybrid application.

Furthermore, conditions will likely be attached to the Decision Notice to ensure compliance with Civil Aviation requirements.

#### Summary

As has been set out across these pages, the tall buildings in the Proposed Development positively respond to the criteria set out in Part 1 of Policy D.DH6, against which all proposals for tall buildings within the London Borough of Tower Hamlets must be assessed.

To compliment the above design policies, LBTH produced the High Density Living SPD (2021), and whilst it would be too much detail for this document to address how the Proposed Development meets this guidance, the Applicant's Design Team are ensuring close compliance and have demonstrated this as part of the hybrid planning application, notably within the Design Code prepared by Levitt Bernstein and submitted as part of this application.

### Adopted policy: LBTH D.DH6 Part 3

#### Introduction

In addition to Part 1, Policy D.DH6 establishes within Part 3 that tall building proposals will be supported outside of Tall Building Zones where they meet the criteria set out in Part 1 and can demonstrate four criteria (A-D).

These criteria, and an assessment of the Proposed Development against them, is provided across the following pages.

A. Be located in areas with high levels of public transport accessibility within town centres and/or opportunity areas;

The Site benefits from a good level of public transport accessibility and part of the site is located within a Neighbourhood Centre, as established in LBTH's Town Centre Hierarchy, and the whole site is within an Opportunity Area, and has been allocated as a site for regeneration within LBTH's draft Leaside Area Action Plan. London Plan (2021) Policy H1 also states that boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites,

especially from sites with PTALs 3 to 6 which are located within 800 metres distance of a station or town centre boundary. The Site benefits from a good level of public transport accessibility. The site specific PTAL calculation for the Site, considering the actual walking distances and public transport service providers, identifies a PTAL ranging from 3 to 4. This is illustrated on the diagram below.

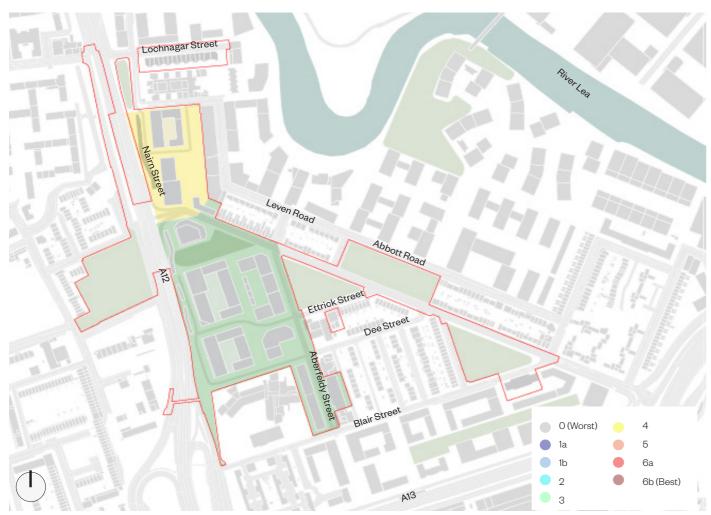


Fig.37 Diagram illustrating the calculated PTAL of the Site

The diagram below shows the opportunity areas within Tower Hamlets. The Site is located within the Lower Lea Valley Opportunity Area, located in the east of the Borough.

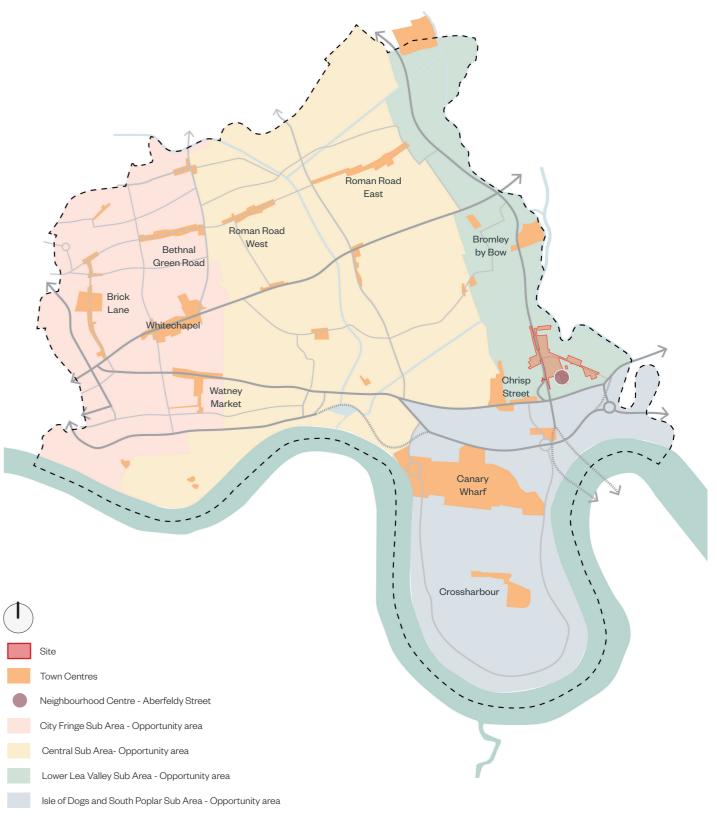


Fig.38 Diagram showing London Borough of Tower Hamlets Opportunity Areas, including the Lower Lea Valley within which the Site is located

#### Adopted policy: D.DH6 Part 3

**A.** Be located in areas with high levels of public transport accessibility within town centres and/or opportunity areas;

Whilst continuing to promote a good level of public transport accessibility, the proposed repurposed underpass between Highland Place and the west of the A12 into a pedestrian and cycle Underbridge, will also bring further benefits. It will significantly improve the walking routes to public transport stops and stations by making these more attractive and safer, in addition to improving air and noise quality when crossing the A12.

Proximity of the Site to the local stations and public transport stops is illustrated on the diagram below. The tall buildings will be located at a key nodal point, adjacent to the repurposed underpass, and therefore will aid legibility to and from these public transport hubs.

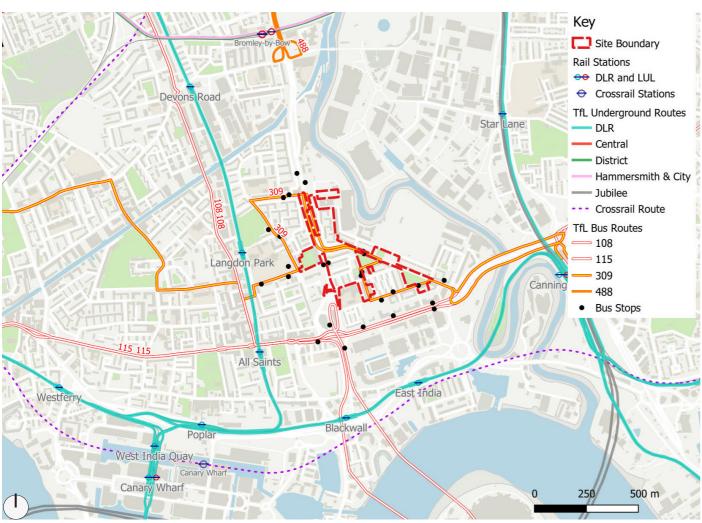


Fig.39 Diagram illustrating the current rail and bus routes surrounding the Site

Through public consultation, resident engagement and youth engagement with Langdon Park School, residents of the Aberfeldy Estate, young people and members of the local community have identified the existing subways at both Dee Street and Abbott Road as feeling unsafe. Additionally, the at-grade crossing takes a long time to cross with pedestrians and cyclists required to wait in the central reserve of the A12 for 60 to 90 seconds before crossing to the other side of the A12. The Underbridge will provide a well lit, safer route across the A12 that is wide enough to comfortably accommodate the number of pedestrians and cyclists using it.

As illustrated on the diagram below, the Underbridge will help to overcome the barrier and severance caused by the A12, and better connect the existing and proposed green spaces, local centres and transport hubs. Collectively this will help to promote walking and cycling, and sustainable travel.

Site boundary

Major roads

Significant east west severance

Emerging east west connection and Underbridge

Aberfeldy Island

Local Centres
Outdoor amenity spaces
Shopping Centre

Local shops and cafés OStar Lane Star Lane Park Furze Green To Barking Leven Road ⊕ Co-Op Local shops and cafés East India

Fig. 40 Diagram illustrating the existing green infrastructure, routes to local centres and bus stops and the severance caused by the A12

#### Adopted policy: D.DH6 Part 3

#### B. Address deficiencies in the provision of strategic infrastructure

At present the Site is surrounded by large infrastructure such as the A12, A13 and River Lea, resulting in the "Aberfeldy Island" being severed from its surroundings, with the A12 in particular causing a significant barrier to the east-west movement. This can often hinder walking and cycling, and separates many of the key development areas from the existing community, local centres and transport hubs as illustrated in the diagram below.

Site boundary
Major roads
Significant east west severance
Aberfeldy Island
Local Centres
Outdoor amenity spaces
Shopping Centre



Fig.41 Diagram illustrating the severance caused by the A12 and the disconnection between Aberfeldy and surrounding infrastructure

The Proposed Development will address the severance caused by the A12 through the repurposing of the vehicular underpass into a new pedestrian and cycle Underbridge. This is illustrated on the plan below. This key strategic route will benefit the whole of the Poplar Riverside and the many developments coming forward along the River Lea, notably the Leven Road Gasworks and East Riverside development sites.

Site boundary
Enterprise Yard
Community Lane
High Street
Healthy Street
East West links
New East West connection

Connections to new services and amenities within the previously approved Aberfeldy Village Masterplan Phases 1-3 will be enhanced, and connections to Aberfeldy Street strengthened. Routes to other local centres, including Chrisp Street Market and All Saints local centre would also be improved through reduced A12 severance, and the improved legibility offered by tall buildings at this important nodal point along the new east west connection.

Local primary and secondary schools would benefit from improved, more attractive connections, with students, teachers and parents able to travel to and from schools more safely.

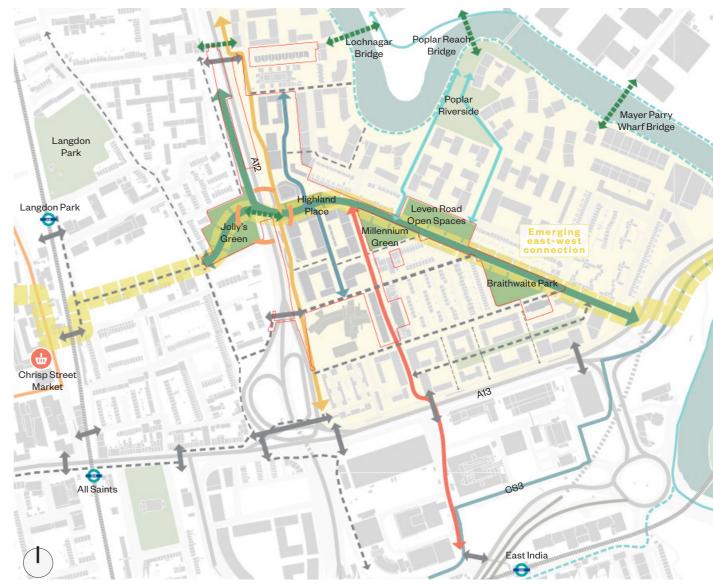


Fig. 42 Diagram illustrating the emerging east to west connection overcoming severance caused by the A12

### Adopted policy: D.DH6 Part 3

#### B. Address deficiencies in the provision of strategic infrastructure

The Proposed Development will create additional open space and improve the connections to the existing provision, linking the spaces of Millennium Green, Leven Road Open Space and Braithwaite Park, in addition to the proposed Highland Place along the Healthy Street. This will create a green grid promoting and aiding accessibility to these spaces and encouraging active lifestyles. This builds on the LBTH Green Grid Strategy (2017) and is illustrated in the diagram below.

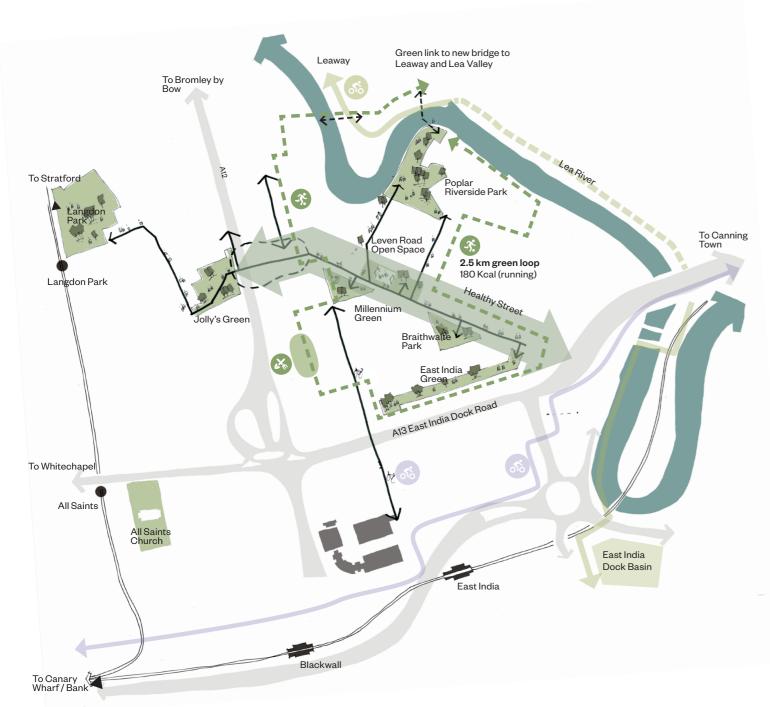


Fig.43 Digram to illustrate the proposed green network

The Proposed Development will deliver an enhanced connection from Aberfeldy to the west of the A12 via the pedestrianisation of the existing vehicular underpass and a new direct link to Jolly's Green. This will add valuable spaces to the open space network, and connect them along clear, legible pedestrian and cycle routes. Images showing the proposals for the Underbridge connecting Highland Place with the Slip Road and Jolly's Green, and the journey between these spaces are shown on this page.

Following validation of the Hybrid Application, the Applicant has been in discussions with LBTH officers in relation to the



Fig.44 Visualisation of the approach to the Underbridge in Highland Place



Fig.46 Visualisation of the entrance to the Underbridge



Fig.48 Visualisation of the direct connection to Jolly's Green

aspirations for a direct link from the pedestrianised underpass into Jolly's Green and works to Jolly's Green. The Applicant and LBTH officers have jointly agreed that the works to Jolly's Green should be included within the red line and secured as part of the future planning permission. Further information on the proposals for a direct link from the pedestrianised underpass into Jolly's Green and works to Jolly's Green are included in the Masterplan Design and Access Statement.

In addition, the Proposed Development will result in significant CIL and s.106 contributions which will be used to fund significant infrastructure improvements to the local area.



 $Fig. 45\ \ Visualisation\ of\ the\ Underbridge\ connecting\ to\ the\ Slip\ Road$ 



Fig.47 Visualisation of the Slip Road adjacent to the A12  $\,$ 



 $Fig. 49\ \ Visualisation\ of\ the\ route\ along\ the\ Slip\ Road$ 

### Adopted policy: D.DH6 Part 3

**C.** Significantly strengthen the legibility of a Major, District or Neighbourhood Centre or mark the location of a transport interchange or other location of civic or visual significance within the area

The Proposed Development has been designed in consultation with LBTH officers and the heights strategy has evolved to respond to the key local and wider townscape and views, as well as neighbouring heritage assets. The latter includes Balfron Tower and the conservation area within which it sits. A Built Heritage Assessment and a Townscape and Visual Impact Assessment have been prepared which demonstrate that the proposed tall buildings do not harm any designated and non-designated heritage assets or key views. These have been submitted as part of this hybrid planning application.

The Proposed Development will help to reshape and regenerate the area, acting as a marker of significant change.

The tall buildings will act as a marker for Aberfeldy Village itself and signal the transformation of this large regeneration area.

The Proposed Development will enhance the legibility of the area by emphasising the new key east-west route: the transformed vehicular underpass to the new pedestrian and cycle Underbridge beneath the A12, which opens into the new public space, Highland Place. This is a strategically important east to west route which will finally address the segregation of Poplar Riverside from the rest of Poplar by the A12. It is also part of a wider network of masterplan threads, shown on the adjacent diagram, which improves both east-west and north-south connectivity and legibility and connects Aberfeldy into its surroundings.



 $Fig. 50\ \ View \ along\ Abbott\ Road\ showing\ the\ tall\ buildings\ marking\ Highland\ Place\ and\ the\ entrance\ to\ the\ Underbridge\ (Illustrative\ proposal)$ 

The location of tall buildings adjacent to the repurposed underpass will also mark Highland Place as a significant area of new public realm and civic space for the existing and future residents of Aberfeldy and the surrounding neighbourhoods. This space, as illustrated in the image below, will offer play and amenity space, affordable workspaces, retail opportunities and cafés, creating a hub of community activity at the heart of the neighbourhood.



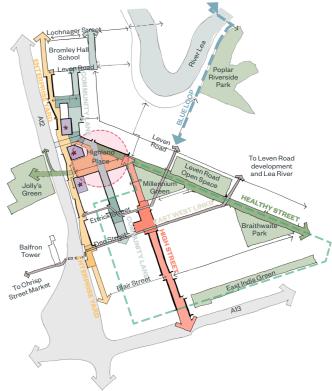


Fig.51 The threads of the masterplan



 $Fig. 52 \ \ The \ Underbridge \ in \ Highland \ Place, at the \ heart of the \ neighbourhood \ (Illustrative \ proposal)$ 

#### Adopted policy: D.DH6 Part 3

**D.** Not undermine the prominence and/or integrity of existing landmark buildings and tall building zones (taking account of the principles set out in Figure 8).

The proposed tall buildings are located to mark the transformed underpass at Highland Place and away from Balfron Tower, which is a local landmark. Buildings in the vicinity of Balfron Tower will be lower and so will not undermine the existing building's impact and imposing scale. By keeping buildings in this area low, the 'sky-space' around Balfron Tower and the Balfron Tower Conservation Area will be protected,

ensuring that the Proposed Development and the historic buildings read as separate and distinct from one another.

The buildings which will sit directly across the A12 from Balfron Tower are lower rise and horizontal in form. This will preserve key views of the existing building and retain the reading of important architectural elements including the expressed circulation core and access galleries.

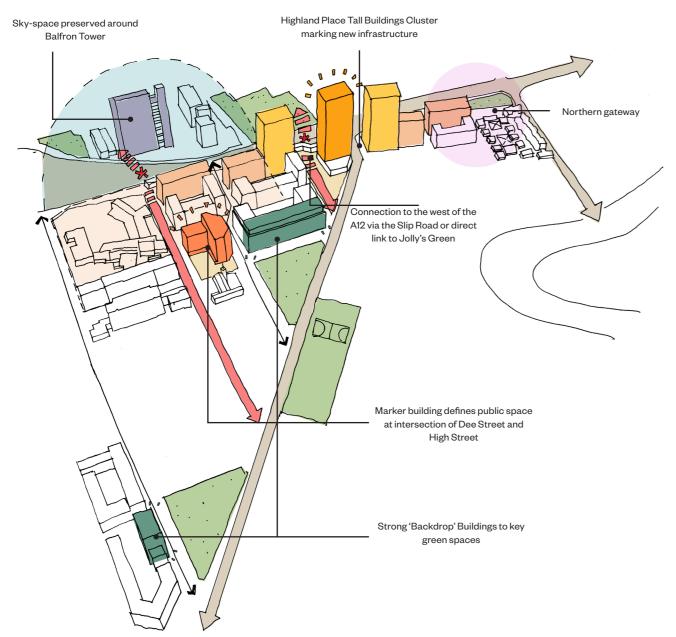


Fig.53 Massing and tall buildings strategy

The tall buildings set around Highland Place have been designed to take account of the 'Figure 8: Principles of Tall Buildings Clusters' set out in the explanatory text of Local Plan Policy D.DH6 and are located at a significant distance from the designated Tall Building Zones within the LBTH Local Plan, notably Canary Wharf, Blackwall and Leamouth tall building zones.

Building heights step down significantly at the edge of the Proposed Development, ensuring that the cluster of three buildings at Highland Place is clearly defined. This will avoid the merging of tall buildings clusters. Tall buildings are positioned in such a way as to avoid breaking the silhouette of any tall buildings clusters when seen from the southern bank of the Thames riverfront.

The three tall buildings will display variation in height and a

clear hierarchy of importance. The tallest element, which marks the entrance to the Underbridge and acts as a terminus to Abbott Road, will be expressed differently to its neighbours, both of which are slightly lower. This is the key moment of height and tall buildings which could undermine this cluster are not proposed in other areas of the Site.

The massing and tall buildings strategy has been developed through a number of consultations with LBTH and significant changes have been made to minimise any impact on heritage

The image below and the dynamic views along Dee Street and Abbott Road, included on the following page, demonstrate the sensitive design of the proposed tall buildings, to ensure that they do not undermine the prominence of existing landmark buildings or have a negative impact on key views.



 $Fig. 54\ \ View of the Proposed \ Development \ and \ Balfron \ Tower \ Conservation \ Area, looking \ east \ from \ Langdon \ Park$ 

## Adopted policy: D.DH6 Part 3

**D.** Not undermine the prominence and/or integrity of existing landmark buildings and tall building zones (taking account of the principles set out in Figure 8).

#### Dee Street



Fig.55 Massing of new buildings designed to preserve silhouette of Balfron Tower



Fig.56  $\,$  New buildings become prominent in the foreground as the viewer moves west on Dee Street



Fig.57 Balfron Tower is revealed at the junction between Dee Street and Enterprise Yard

#### Abbott Road



Fig.58 View north-west on Abbott Road showing relationship between Balfron Tower and new tall buildings cluster



 $Fig. 59\ \ The tall buildings at the centre of the masterplan demonstrate a clear hierarchy through height, materiality and architectural treatment$ 



Fig.60 The tallest building is unique within the masterplan as it's orientated to direct the eye towards Highland Place and the transformation of the underpass

### Emerging policy: Tall Buildings SPD

#### Introduction

Consultation on a Tall Buildings SPD has been carried out by LBTH in early 2022 and it closed on the 4<sup>th</sup> March 2022. Representations were submitted by the LLP to the Council. A workshop presentation document relating to the Isle of Dogs and South Poplar area (Ref. 2-21) sets out the background and context to the production of the SPD, including the policies set out in the Local Plan, and sets out some initial proposed design guidance.

Whilst limited weight can be given to policy that has not been fully adopted, the draft Tall Building SPD (2021) has been reviewed and its content considered. On this basis, the Proposed Development is assessed against the 12 key objectives set out in the Draft SPD across the following pages.

## **Objective 1.** Be part of a plan-led and place making approach

Planning policy directs tall buildings towards locations in which they can positively respond to their local context and character and contribute to the sense of place, or have a clear role in the creation of place.

Within the Proposed Development, marker buildings define key public squares, such as Building F located on the Town Square, and linear buildings create backdrops to existing green spaces, including Millennium Green and Braithwaite Park. A cluster of tall buildings contribute to the creation of Highland Place, which is both a new strategic piece of infrastructure (explained in

more detail in Objective 2) and a destination offering opportunities for play, leisure and recreation for residents of Aberfeldy and from surrounding neighbourhoods.

Collectively, buildings and public spaces (both new and existing) have been designed to work together, with the scale and language of the architecture informed by the character of the public realm and key routes and connections. As well as being of the highest quality, tall buildings have been carefully designed and located to ensure that they respond to the scale and character of their surroundings, with particular consideration given to their relationship to heritage assets such as Balfron Tower and their proximity to existing lower-rise development.



Fig.61 Tall buildings contributing to the creation of place - view along Abbott Road to Highland Place (Illustrative proposal)

## **Objective 2.** To enhance identity, legibility and strengthen sense of place

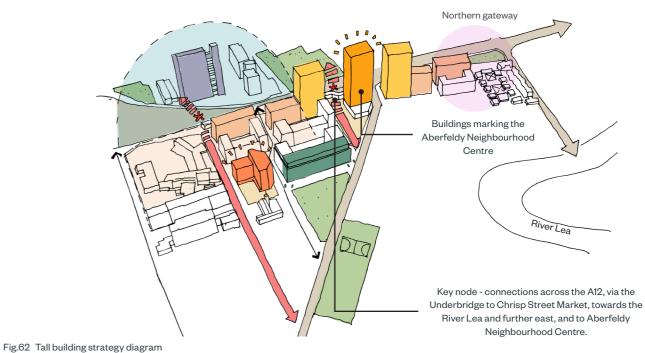
Tall buildings can play an important role in estate regeneration, particularly within Opportunity Areas such as the Lower Lea Valley where the Site is located, where growth and development are actively and emphatically encouraged.

There is a need to strengthen legibility, identity and sense of place in this part of Poplar and we believe that tall buildings can help to achieve this as part of a well thought out masterplan, which is embedded in the area.

These buildings would be neighbourly and responsive to their context. They would help to announce the enhanced Aberfeldy Neighbourhood Centre, which is set to take on an increasingly important role serving a growing population at Poplar Riverside, at the heart of the opportunity area.

The location of tall buildings at Highland Place - a key node beside the A12 - would also mark the new east west pedestrian and cycle route providing a safe and pleasant connection between communities on either side of this busy road. The buildings would strengthen the sense of arrival at this evolving urban quarter from both the northern and southern approaches along the A12, whilst also marking improved connectivity and accessibility more generally throughout the neighbourhood. In turn this promotes better integration of the Aberfeldy Village Masterplan with other areas, including the earlier phases of the previously approved Aberfeldy Village Masterplan, DLR stations, the River Lea, Aberfeldy Street and Chrisp Street Market.

There is a compelling case for tall buildings to support placemaking and signal the transformation of this large regeneration area.



## **Objective 3.** To protect and enhance the existing heritage and townscape

The relationship between the Proposed Development and existing heritage assets, particularly Balfron Tower, has been at the heart of the design process. The massing and architectural approach has been developed in discussion with officers and Historic England.

A Built Heritage Assessment and Townscape and Visual Impact Assessment have been undertaken to demonstrate that the proposed tall buildings do not harm the settings of any designated or non-designated heritage assets or key views. These assessments, prepared by KM Heritage and The Townscape Consultancy respectively, have been submitted in support of this hybrid planning application.



Fig.63 Balfron Tower

#### Emerging policy: Tall Buildings SPD

## **Objective 4.** To be proportionate to the role and importance of a place

The tall buildings are located within a designated Neighbourhood Centre on a site with high levels of pedestrian activity and with good public transport accessibility. More specifically they mark the new east west pedestrian and cycle route, which provides a safe, direct connection between Aberfeldy and Jolly's Green but also improves wider east-west connectivity throughout the area

The inclusion of tall buildings within the masterplan will signal change, raise profile, generate confidence and support regeneration.



Fig.64 Highland Place and the proposed Underbridge

## **Objective 5.** To form clusters where appropriate

The tall buildings form a distinct cluster at Highland Place. Grouping the buildings in this way identifies this proposed public space and the connection across the A12, via the Slip Road or directly to Jolly's Green via the Underbridge, as an important new connection.

This cluster of tall buildings at Highland Place does not merge with existing or emerging tall buildings clusters or LBTH's Tall Building Zones and are designed to ensure sufficient distance between one another. The buildings respond to the scale and hierarchy of the local area and make a positive contribution to the skyline.

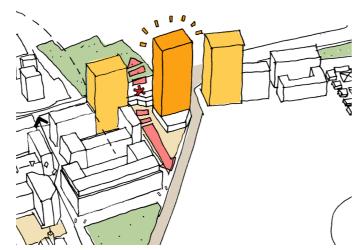


Fig.65 Illustrative sketch showing cluster of tall buildings marking proposed public space and connection to the west of the A12

## **Objective 6.** To safeguard Canary Wharf's iconic image

The tall buildings do not compete with, nor harm, the Canary Wharf cluster as a distinct and iconic skyline. This has been demonstrated in the Townscape and Visual Impact Assessment prepared by The Townscape Consultancy and submitted as part of this application.



Fig.66 Canary Wharf skyline

## **Objective 7.** To promote outstanding sustainable design

The proposed tall buildings will be of the highest architectural and urban design quality. They will add interest and variety to the local area and will deliver high-quality new homes and public realm.

The Applicant has a commitment to delivering high quality design and place-making as they have demonstrated in the delivery of phases 1-3 of the extant planning permission. A Design Code forms part of this hybrid planning application to secure design quality across the Outline Proposals as they come forward in future Reserved Matters Applications.

Buildings will be designed to respond to their context, with the tall building cluster at Highland Place taking cues from Balfron Tower, interpreting the language of vertical and horizontal elements and making a subtle nod to the existing buildings.

Changes in detail, plane and material will be used to define a human scale at ground floor level and careful consideration will be given to how the buildings meet the ground and to their relationship to the public realm.

The masterplan has been designed to encourage walking and cycling and to minimise car usage and private car ownership.

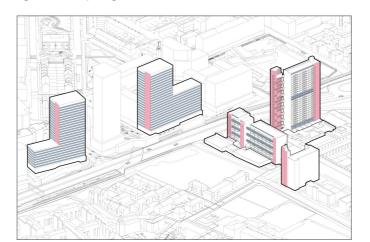
Buildings are simple in form to minimise exposed surfaces (low form factor) and will be designed to high levels of air tightness and be well insulated, keeping homes warm and reducing the need for heating. Embodied carbon will be considered throughout the detailed design stages, with material choices responding to the latest standards, regulations and best practice guidance.

The Proposed Development has been designed to maximise dual-aspect homes and to provide opportunities for natural ventilation. The incorporation of recessed balconies provide shading to living spaces in the summer months.

Green and blue roofs maximise urban greening factor and PV panels and air source heat pumps, providing renewable energy, are also provided.



Fig.67 Aberfeldy Village Phases 1-3: East India Green



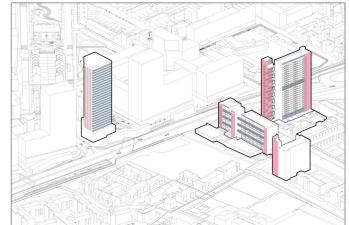


Fig.68 Diagrams exploring the ways in which the architectural language of Balfron Tower can be subtly interpreted in the design of the proposed tall buildings cluster at Highland Place

#### 47

#### Emerging policy: Tall Buildings SPD

# **Objective 8.** To contribute to high quality places where people want to live and spend their time

Through exceptionally well-considered urban design, the application is bringing forward proposals for development which positively responds to the character of its immediate context and contributes to the creation of a high-quality place in which people will want to live and spend time.

The tall buildings that are proposed within the scheme have been designed in such a way that they mark the centre of the Aberfeldy neighbourhood and the new strategic east west connection. Their role will help bring people to and through Aberfeldy, with adjacent uses providing amenity and opportunities for play, leisure and recreation.

The buildings are designed to be of an appropriate height and scale to ensure they are not 'overbearing' or overshadowing onto surrounding streets and public spaces, and that they respect the scale of the surrounding streets and spaces. The tall buildings are consolidated at Highland Place to avoid 'creep' and maximise distance from existing low-rise homes.

Their bases have been designed to be activated with a mix of uses and respond to both the human scale and adjacent areas of public realm and open space, which includes significant green areas as well as high quality planting and mature trees.

Tall buildings offer opportunities for new high quality homes with amenity spaces which overlook attractive new and existing public spaces. Recessed balconies are proposed on all tall buildings, with the potential for winter gardens overlooking A12, to ensure private amenity space is comfortable and of a high quality. Landscaped communal amenity spaces, which incorporate well designed play areas, are provided to support this offer.

Careful consideration has been given to microclimate, noise, air quality and amenity, and the design has developed in response to the recommendations of specialist consultants to ensure that a pleasant environment can be provided within the Site and to minimise impact on the surrounding area. The hybrid planning application is supported by an Environmental Statement, prepared by Trium, which assess the Development's impact on microclimate.



Fig.69 View along Abbott Road to the tall buildings located on Highland Place, with recreation space, play and non-residential uses (Illustrative proposal)

## **Objective 9.** To deliver a human scale at street level

Plinths are proposed at the base of taller buildings on Enterprise Yard and the High Street. Setting back the residential buildings above will reduce the perception of height at street level. Through changes in material and architectural expression, these plinths will define an active, human scale ground floor zone. Existing trees have been retained where possible, and new tree planting will also contribute to a human scale at street level. The thresholds between public and private spaces have also been carefully considered to ensure a degree of privacy to the front of homes, clear and legible entrances, and that the street level experience and journeys to homes are safe and well lit. Further information is provided on page 25 of this document.



Fig.70 Plinths to tall buildings define a human scale at street level

## **Objective 10.** To deliver new homes and economic growth

The tall buildings are fundamental to the delivery of significant replacement affordable housing and an increase in overall housing on the Site.

These buildings also support a significant amount of commercial, workspace and retail space which is being delivered as part of the masterplan.



Fig.71 Non-residential spaces at the base of building F

### Emerging policy: Tall Buildings SPD

## **Objective 11.** To deliver comprehensive development

The tall buildings form part of a comprehensive development which has been carefully designed to facilitate the future redevelopment of adjacent sites. The Applicant has taken every opportunity to explore how underutilised land can be incorporated through comprehensive land assembly discussions. Where this has not been feasible, the masterplan has been designed to facilitate its future redevelopment.

The Proposed Development delivers tall buildings along side mid and low-rise elements to provide a mix of typologies, including family homes.

The challenges of servicing and the provision of a mix of uses to provide activity at ground floor level have been fully addressed. The Proposed Development will offer a mix of types and tenures of dwellings from smaller apartments to larger family homes alongside supporting public realm, open space, play, and private amenity.



 ${\it Fig. 72~Mixed~use~development~providing~activity~along~Aberfeldy~Street}$ 

#### Objective 12. To deliver added value

The Proposed Development will address the segregation caused by the A12 through the transformation of the vehicular underpass to a new pedestrian and cycle Underbridge. This will be marked with a new high-quality civic space 'Highland Place' offering amenity and benefits to the new, existing and surrounding community.

This key strategic connection will benefit the whole of the Poplar Riverside and the many developments coming forward along the River Lea, notably the Leven Road Gasworks and East Riverside development sites. Refer to the Planning Statement prepared by DP9 for a full list of planning benefits.



 $Fig. 73 \ \ Highland \ Place \ and \ the \ proposed \ underpass \ transformation \ bringing \ great \ benefits \ to \ Aberfeldy \ and \ the \ wider \ community$ 

Summary 50

The Applicant is committed to the long-term vitality and vibrancy of the Aberfeldy Village Masterplan. The tall buildings form a fundamental component of the Proposed Development and the principle of their inclusion are grounded within planning policy, the wider emerging townscape context, and they have been designed to the highest architectural and urban design quality, and set within a well considered and high quality public realm. The Design Code will also help to ensure the retention of this quality as latter phases of the Outline Proposals come forwards to Reserved Matters.

This comprehensive and transformative strategic regeneration scheme will deliver significant qualitative and quantitative improvements in residential provision for the local community, provide high levels of affordable housing and deliver a high-quality living environment with retail and community facilities to strengthen the neighbourhood centre.

The high-density, high-quality proposals respond appropriately to the Site's accessibility and townscape context, acting as a catalyst for change. The intensification of the Site responds proactively to local, regional and strategic priorities for good growth in sustainable locations, and appropriately targets high-density and large-scale development on this strategically important regeneration Site.

Further information about how the Proposed
Development meets Planning Policy and the
planning benefits of the Proposed Development
can be found in the **Planning Statement** prepared by DP9
which supports this hybrid planning application.



Fig.74 Mixed use development providing activity along Aberfeldy Street

