



THE GOODSYARD

Planning Statement

September 2019



ballymore.



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THE GOODSYARD

PREFACE

PREFACE

This is a Planning Statement prepared by DP9 Limited.

It is submitted in relation to amendments ("Proposed Amendments") that are being made to the planning applications and applications for listed building consent (the "Applications") for the redevelopment of Bishopsgate Goodsyards. The Applications as amended by the Proposed Amendments form the "Revised Scheme".

On 21st July 2014 Bishopsgate Goodsyards Regeneration Limited (the "Applicant") submitted the Applications to the London Borough of Hackney and the London Borough of Tower Hamlets (the "Boroughs").

On 23rd September 2015 the then Mayor of London directed that he would act as local planning authority for the purposes of determining the Applications.

On 12th April 2016 the then Mayor deferred the determination of the Applications to allow the Applicant to address the issues raised in the Stage III Report.

The Applicant has carefully reviewed the issues raised in the Stage III Report and has liaised closely with the Mayor of London, the Boroughs and other stakeholders and consultees and is now submitting amendments to the Applications to address their feedback.

In broad terms, the Applicant is making the following Proposed Amendments to the Applications:

Plot 1 (Formerly Plots A and B)

The Proposed Amendments maintain the height of the building and the type of uses, as currently proposed and retains the bridging over the East London Line box. The building massing is proposed to be revised to include setbacks at the upper levels as a result of feedback from the GLA and the Boroughs to address the relationship with adjacent buildings.

Plot 2 (Formerly Plots F and G)

The Proposed Amendments replace the two tallest residential buildings with a commercial building with retail at the ground floor. The building would extend up to 17 - 29 storeys and would be the tallest building proposed. This building is being submitted with all matters in detail.

The reduction in height of Plot 2 means that no part of the scheme is now visible in views from the South Bastion of Tower Bridge.

Plot 3 (Formerly Plot K)

The Proposed Amendments maintain the height and footprint of the building and the type of uses, as currently proposed. The Proposed Amendments address design comments in respect of the treatment to Phoenix Street and the listed Oriel Wall along Commercial Street.

Plot 4 (Formerly Plot C)

The Proposed Amendments maintain the uses within this building and comprise retail at ground floor with residential above. The height of the building is proposed to be reduced to 19 storeys.

Plot 5 (Formerly Plot D)

The Proposed Amendments maintain the uses within this building and comprise retail at ground floor with residential above. The height of the building is proposed to be reduced to between 6 -13 storeys.

Plot 6 (Formerly Plot E)

The Proposed Amendments change the use of this building to a cultural type use with retail use. The height of the building is proposed to be reduced to up to 5 storeys in order to address comments raised by the GLA in respect of daylight and sunlight impacts along Sclater Street and the massing in the north-east part of the site.

Plots 7, (Formerly Plots H, I, J), 8A, 8B, 8C, 10 and 11 (the Pavilion)

The Proposed Amendments maintain the mix of retail uses within the Oriel as well as the potential for Class D1/D2 uses within the Braithwaite arches with public open space above, as currently proposed (Plot 7). Plot 8 introduces hotel and residential uses with access at ground floor level within a 25 storey building to the west of Braithwaite Street, plus 4 storey pavilion buildings on top of the existing arches. The Proposed Amendments introduce residential within Plot 10 with retail at ground floor. The Proposed Amendments introduce retail use within a single storey building in Plot 11.

Public Open Space

The overall amount of public space as part of the Proposed Amendments would increase at platform level, including an area of consolidated open space at the eastern end of the platform.

The Proposed Amendments, and the rationale for them, are explained fully in the Planning Statement prepared by DP9 Ltd.

The Proposed Amendments to the Applications have required some changes to be made to the Planning Statement and other documentation originally submitted with the Applications.

Rather than issuing tracked changed documents, the Applicant has issued this revised Planning Statement which replaces in its entirety that submitted previously.

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**EXECUTIVE
SUMMARY**

0.0 EXECUTIVE SUMMARY

Bishopsgate Goods Yard is one of the largest vacant brownfield sites (4.4ha) in central London and represents a major opportunity to continue the process of regeneration and renewal in the surrounding area that has been ongoing for the last 15 years. The site has remained undeveloped for the last 50 years largely because the regeneration of the site has proved to be economically challenging due to the significant site constraints.

Planning applications for the redevelopment of the site were submitted on the 21st July 2014 to both London Borough of Hackney ('LBH') and London Borough of Tower Hamlets ('LBTH') for determination, with revisions to the application submitted in June 2015 which sought to address specific officer and statutory consultation comments.

On 15th September 2015 the former Mayor received a request to become the local planning authority for the purpose of determining the two planning applications at the Bishopsgate Goods Yard site. On 23rd September 2015, having considered a report on the case, the former Mayor notified LBH and LBTH that he would act as the local planning authority for the purposes of determining the planning applications.

The GLA Representation Hearing Report ("Stage III Report") was published on 8th April 2016 and a public representation hearing was due to be held in April 2016 for the former Mayor to determine the planning applications. The former Mayor also took over authority to determine the two-related listed building applications. The Stage III report set out that the proposed development would offer significant potential public benefits, however, it was noted that the scheme would be delivered in a way that would result in unacceptable and avoidable significant negative impacts. As such, as set out in paragraphs 3 to 5 of the Stage III Report, the recommendation to the former Mayor was that planning permission (and the associated listed building consents) should be refused.

In summary, the former Mayor considered that *"The cumulative harm to heritage assets, the unacceptable daylight/ sunlight impact, density, height, massing and layout of the scheme are considered to significantly outweigh the potential public benefits of the scheme."* The recommendation in the Stage III Report was that the applicant is made aware of *"those areas which could result in remedies to overcome the concerns raised in this report through any future revised schemes."*

In light of the above, following a request from the Applicant to defer the representation hearing in order to work with GLA officers to satisfactorily address the concerns raised, the former Mayor decided to defer the representation hearing for that purpose.

Since that time, through a collaborative approach with the GLA and officers from both Boroughs, the Revised Scheme has evolved to address the concerns previously raised by the former Mayor.

The Revised Scheme provides:

- high quality new buildings of outstanding design quality, which addresses the policy requirements of the Boroughs while responding positively to the onsite heritage assets.
- Delivers a maximum of up to 500 homes of the highest quality.
- Provides 50% on-site affordable housing.

- The delivery of a maximum of 130,940 m² (GIA) of business space. The space can accommodate a wide variety of occupiers, from local small-scale business start-ups to large multi-national corporations. Importantly an element of the commercial floorspace will be provided as ‘affordable workspace’ to provide access to local enterprises to occupy the new floorspace.
- The creation of up to 150-bedroom hotel on the site.
- The creation of 18,390 m² (GIA) of new retail floorspace, providing opportunities for local businesses to accommodate floorspace in a prime location.
- The provision of a mix of retail uses which enables activity throughout the site connecting two existing retail nodes, Brick Lane and Shoreditch High Street. The retail strategy promotes small independent stores, which reflects the characteristics of the existing retail in the area.
- The creation of 9,759 net FTE jobs across the predominately B1 office, hotel and retail uses which will generate £741 million GVA to the economy.
- Creation of 379 FTE jobs created during the construction phase, which will generate £24 million GVA per annum to the economy.
- Significant improvements to the public realm and setting for the area by providing generous, high quality publicly accessible spaces that are legible, permeable and accessible to all; and importantly improve safety and surveillance.
- The regeneration of a highly accessible brownfield site, identified at regional and local levels as a major development opportunity for a mixed use, high density development.
- Represents a sustainable and energy efficient design, with carbon savings, which maximize carbon reduction.

In addition to the significant regeneration benefits resulting from the Revised Scheme, there are many additional on-site heritage benefits gained, including the safe-guarding for future use structures that are on the Historic England ‘At Risk’ register, to ensure their preservation and maintenance for years to come including:

- Repair, reuse and enhancement of the grade II listed Braithwaite Viaduct, a substantial and currently hidden building at risk, and full integration of the structure into the wider scheme;
- Repair, reuse and enhancement of the grade II listed Former Forecourt Walls and Gates (the Oriel Gateway), a building at risk which currently contributes very little to the surrounding townscape or the site, and full integration of the structure into the wider scheme;
- Both structures will for the first time in decades to be enhanced and to become publicly accessible and able to contribute to the site and the surrounding historic environment;
- Repair, enhancement and incorporation of the unlisted Sclater Street wall (northern boundary) into the wider scheme with some alteration to provide increased openings;

- Repair, enhancement, refurbishment and reuse of the unlisted Sclater Street weavers' cottages which are currently in a very poor state of repair;
- Repair, enhancement, refurbishment and reuse of the unlisted Sclater Street Mission Hall and incorporation into the wider scheme;
- Alterations to the Brick Lane perimeter wall to improve access from Brick Lane into the site and increase public access to the Braithwaite Viaduct;
- Retention, repair, reuse and enhancement of the unlisted vaults to the south of the grade II listed Braithwaite Viaduct;
- Repair, refurbishment and enhancement of the jack-arches to London Road (with some minor demolition) and incorporation of London Road into the scheme as a principal, public east-west route;
- Retention, repair and enhancement of the former Goods Yard external wall north of the existing ramp and full incorporation into the wider scheme;
- Provision of enhanced linkages and connections between areas of related history and architectural interest as there once were;
- The general repair and refurbishment of the site will enhance the on-site heritage assets' significance and their contributions to the surrounding historic environment and nearby heritage assets and;
- The proposed high-quality development will provide a significantly enhanced interface between the site and the surrounding historic environment, vastly improving on the current character and appearance of the site.

In summary, the Revised Scheme address those comments raised by the Mayor in the Stage III report and is, on balance, consistent with planning policy at the national, regional and local levels. The regeneration of the site, would contribute towards the delivery of a number of policy objectives at all levels which will benefit the site and the surrounding area.

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INTRODUCTION

1.0 INTRODUCTION

- 1.1 References in this document to “application” should be taken to read “applications” reflecting the fact that this is an amendment to two identical planning applications originally submitted – one to LB Hackney and one to LB Tower Hamlets. Therefore, references to “planning permission” should be taken to read “planning permissions” given that two planning permissions will be required for the Revised Scheme to proceed in its entirety.
- 1.2 This revised Planning Statement has been prepared by DP9 Limited (DP9) on behalf of Bishopsgate Goodsyards Regeneration Limited (BGYRL), hereby referred to as the “Applicant”, in support of the Revised Scheme submission for the comprehensive redevelopment of Bishopsgate Goods Yard (“the site”). It is submitted in relation to amendments (“Proposed Amendments”) that are being made to the planning applications and applications for listed building consent (the “Applications”) for the redevelopment of Bishopsgate Goodsyards. The Applications, as amended by the Proposed Amendments, form the “Revised Scheme”.

Background to the Revised Scheme Submission

- 1.3 The Applicant is seeking to obtain outline planning permission with details submitted in part (forming a ‘hybrid’ planning application) for a comprehensive mixed-use redevelopment of the site (‘the Revised Scheme’).
- 1.4 Identical planning applications to develop the site for the Revised Scheme were submitted on the 21st July 2014 to both LBH and LBTH for determination.
- 1.5 On 15th September 2015 the former Mayor received a request to become the local planning authority for the purpose of determining the two planning applications at the Bishopsgate Goods Yard site. On 23rd September 2015, having considered a report on the case, the former Mayor notified LBH and LBTH that he would act as the local planning authority for the purposes of determining the planning applications.
- 1.6 The GLA Representation Hearing Report (“Stage III Report”) was published on 8th April 2016 and a public representation hearing was due to be held in April 2016 for the former Mayor to determine the planning applications. The former Mayor also took over authority to determine the two-related listed building applications.
- 1.7 The Stage III report set out that the proposed development would offer significant potential public benefits. However, the proposed development and the potential public benefits would be delivered in a way that would result in unacceptable and avoidable significant negative impacts. As such, as set out in paragraphs 3 to 5 of the Stage III Report, the recommendation to the former Mayor was that planning permission (and the associated listed building consents) should be refused for the following reasons:

- *“The proposed development does not accord with the development plan in terms of neighbourhood amenity impacts, specifically daylight/ sunlight. This in itself is considered*

serious and furthermore indicates that the density, height, massing and layout of the scheme are not appropriate for this site as these factors result in the significant building mass along Sclater Street that drives the majority of the unacceptable impacts.

- *There remains a design concern regarding the proposed Phoenix Street and the potential for the space to become a magnet for anti-social behaviour.*
- *The negative heritage impacts can be summarised as follows. The development causes:*
 - *Substantial harm to the Grade II Listed Oriel gateway (by demolition of the listed wall)*
 - *Minor harm to the setting of the Tower of London*
 - *Minor harm to the setting of Redchurch Street Conservation Area*
 - *Minor harm to the setting of Brick Lane & Fornier Street Conservation Areas*
 - *Minor harm to the setting of Elder Street Conservation Area*
 - *Minor harm to the setting of the Grade I listed Geffrye Museum*
 - *The demolition of the wall to the south of the oriel and the substantial harm that would be caused by the demolition of the wall, has not been adequately justified and remains.”*

1.8 In summary, the former Mayor considered that *“The cumulative harm to heritage assets, the unacceptable daylight/ sunlight impact, density, height, massing and layout of the scheme are considered to significantly outweigh the potential public benefits of the scheme.”* The recommendation in the Stage III Report was that the applicant is made aware of *“those areas which could result in remedies to overcome the concerns raised in this report through any future revised schemes.”*

1.9 In light of the above, following a request from the Applicant to defer the representation hearing in order to work with GLA officers to satisfactorily address the concerns raised, the former Mayor decided to defer the representation hearing for that purpose.

1.10 Since that time, through a collaborative approach with the GLA and officers from both Boroughs, the Revised Scheme has evolved to address the concerns previously raised by the former Mayor.

1.11 The Revised Scheme is not substantially different to that proposed in the planning application, as set out below:

- The scope of the planning application(s) remains the same. The Revised Scheme does not alter the cross-Borough boundary nature of the Revised Scheme for which planning permission is sought;
- The Revised Scheme still seeks outline planning permission with full details submitted for the tallest proposed building (Plot 2) and the listed elements of the site (Plots 7a, B, C, D);
- The location of the buildings within the site as part of this Revised Scheme submission is substantially the same to those in the currently proposed;
- Whilst it is recognised that in parts of the site the heights of buildings are proposed to be reduced, the fundamental range of uses currently proposed (residential, office, retail, community uses and public open space) are maintained as part of this Revised Scheme submission.
- Public open space is still a key feature and the Revised Scheme provides an increase in the amount of public open space at platform level;
- Plots 1 and 3 (formerly Plots A, B and K) comprise the same uses and building heights as proposed;
- Plot 2 is the tallest building within the Revised Scheme and is located in substantially the same

position as Plots F and G which were the tallest buildings in the current scheme;

- The tallest building proposed, Plot 2, is worked up in detail, which is the same as the previously proposed tallest residential Plots F and G. The height of this building is proposed to be reduced in order to fully address concerns previously raised by the GLA, the Boroughs and Historic England with regard to the harm to the World Heritage site;
- Plots 7B, C, D maintains the proposed mix of retail uses within the arches with additional public open space above. In addition, London Road is retained as a key east-west route through the site.

1.8 Overall, whilst the Revised Scheme comprises a reduction in the total quantum of development, the key objective of the planning application(s) remains - to address the comments raise in the Stage III Report and seek outline planning permission for the comprehensive redevelopment of this strategic site, comprising substantially the same range of uses and building locations across the site. As such, the Proposed Amendments represent a development that is substantially the same as that proposed in the Revised Scheme to be determined by the Mayor, acting as the local planning authority.

1.9 A series of revised documents have been submitted in support of the revised planning application that explain and justify the principles of the revised scheme. Those documents forming part of this Revised Scheme submission and those supporting the revised application are listed below:

- The planning application forms;
- CIL forms;
- The land ownership form and agricultural holdings certificate;
- Application plans (for the Outline Component) in respect of Building Plots 1,3,4,5,6,7E,8,9,10,11;
- Application plans for (for the Detailed Component) in respect of Building Plots 2 and 7A, B, C, D.

1.10 The Revised Scheme submission is accompanied by a number of updated supporting documents and studies. These updated documents are submitted to assist the Mayor, other authorities and the general public in both understanding and evaluating the Revised Scheme submission. The updated supporting documents are set out below.

1.11 Revised documents that address policy and assessment issues:

- Development Specification;
- Design Guide;
- Environmental Statement Addendum, comprising:
 - o Volume 1: Main Text.
 - o Volume 2: Townscape Visual Impact Assessment;
 - o Volume 3: Appendices;
 - o Non-Technical Summary;
- Retail Assessment;

- Transport Assessment;
- Utilities and Services Statement
- Planning Statement;
- Heritage Statement;
- Regeneration Statement;
- Operational Waste Strategy;
- Hotel Needs Assessment;
- Code of Construction Practice;
- Health Impact Assessment; and
- Structural Engineering Condition Survey Report

1.12 Updated Design Documents:

- Design Guide; and
- Design and Access Statement.

1.13 An updated document that describes the consultation process:

- Statement of Community Involvement.

1.14 Updated documents that address the way in which the energy initiatives of the Revised Scheme will be implemented:

- Masterplan Sustainability Statement; and
- Masterplan Energy Strategy.

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**SITE AND
SURROUNDING
AREA**

2.0 SITE AND SURROUNDING AREA

- 2.1 The site covers an area of 4.4 hectares and lies between the diverse neighbourhoods of Shoreditch, Brick Lane, Spitalfields and the City Fringe, close to the northern edge of the City of London.
- 2.2 The site has been predominantly derelict since a fire on the site in the 1960s and demolition of the majority of the buildings in 2004. In April 2010, Shoreditch High Street Station on the London Overground Line opened in the centre of the site with the 'boxed' London Overground Line providing services to the south east, north London and Canary Wharf. In the north of the site, adjacent to Bethnal Green Road, are a number of 'Power League' temporary football pitches and the temporary 'Box Park Shopping Mall', comprising of shops and cafes, in refurbished shipping containers.
- 2.3 The site is bounded by Shoreditch High Street and Commercial Street to the west, and by Quaker Street to the south. Brick Lane, Bethnal Green Road and Sclater Street from the north and eastern boundaries.
- 2.4 The site is well served by Public Transport and has a Public Transport Accessibility Level (PTAL) of 6b. Shoreditch High Street station on the London Overground Line is located on Braithwaite Street is within the heart of the site.
- 2.5 The area to the north of the site along Bethnal Green Road comprises a mix of former warehouses converted to new uses (such as the 'Tea Building'), the 25 storey 'Avant Garde' residential building on Bethnal Green Road, small scale industrial estates, shops and the Rich Mix centre - an important arts and cultural venue. Further north is the Boundary Estate, a residential area developed in the early 1900s with wide residential streets focused on a green space at Arnold Circus.
- 2.6 To the west of the site is Shoreditch High Street and Old Street which are busy main roads with shops and commercial uses. To the south west of the site is the City of London, characterised by large scale office buildings.
- 2.7 The area to the south of the site is characterised by a network of smaller streets comprising a mix of residential, commercial and retail uses, extending south towards Spitalfields Market. The eastern edge of the site is defined by Brick Lane, a vibrant area with a mix of small shops, popular bars and restaurants, some with residential above. Extant planning permissions exist for tall buildings at Principal Place on Norton Folgate and 'The Stage' on Curtain Road, both west of the A10, which, together with Broadgate Tower, will form a cluster of tall buildings along this route.
- 2.8 A number of historic structures occupy the former Goods Yard site and include the Braithwaite Viaduct, the gates, walls and oriel window on the Bishopsgate frontage, all of which are Grade II listed. These structures are in a poor state of repair and have been placed on the Historic England 'Heritage at Risk Register' for London.
- 2.9 Also retained on site are other remnants of the Goods Yard structure, which include the boundary wall on Sclater Street; areas of original boundary walls to the south and east; and viaduct structures to the south and west of the Braithwaite Viaduct containing coal stores, hydraulic accumulator, rails and a single turntable.

- 2.10 Beyond the site, there are also a number of buildings on the south side of Sclater Street, which lie within the Fournier Street and Brick Lane Conservation Area. These buildings include an unlisted terrace of C18 former weavers' cottages and an unlisted C19 non-conformist chapel.
- 2.11 The site is located in close proximity to many designated heritage assets, including listed buildings and conservation areas. A number of conservation areas are located directly adjacent to the site, including Boundary Estate to the north, South Shoreditch to the north and west and the Fournier Street and Brick Lane to the east and south and Elder Street to the south.

Site Constraints

- 2.12 The site is subject to a significant range of physical and complex constraints located above, on and below ground level which are set out below. It has been shown through surveys of the entire site that due to the identified physical constraints, the area within which foundations can be placed is limited to approximately one third of the site.
- 2.13 The physical site constraints derive from existing and future infrastructure passing through the site, historic structures and environmental and conservation issues. There are also local and strategic townscape issues raised when considering the regeneration of the site for a high-density development.

The Borough Boundary

- 2.14 The borough boundary runs in a north south direction to the west of Braithwaite Street.

Historic Structures

- 2.15 There are two Grade II listed structures on site: Braithwaite Viaduct, the Forecourt Wall and Gates to Goods Station. There are also 272 listed buildings in the vicinity of the site comprising of Grade I, Grade II and Grade II*.
- 2.16 The Braithwaite Viaduct in particular places are a constraint on development in the following ways:
- The desire to preserve the listed fabric and for development to have a minimal impact upon the fabric of the listed structure;
 - The extent of possible loading on top of the viaduct and penetrations through the existing structure which may be needed to support buildings above.
 - The load capacity of the non-listed structures relates closely to their condition;
 - London Road running east-west along the full length of the unlisted arches is a strong feature of the historic plan of the site and contains remains of tramways and turntables.

London Overground Line

- 2.17 The elevated London Overground Line runs west to east across the site. The elevated structure runs through the above ground level and has been 'boxed in' by the Applicant, at considerable cost, to enable development to take place around the structure. This represents a significant intervention across the site and places the following constraints on development:

- The siting and extent of foundations of the London Overground Line and the impact this has on the construction of basements within a scheme for the site;
- The acceptability for buildings to span over the box structure; .

Mainline

- 2.18 The Mainline into Liverpool Street Station runs in an open cut, approximately 7m below grade level.

Suburban Line

- 2.19 The Suburban Line tracks are at a similar level to the Mainline tracks at the bottom of a two storey, three level enclosure. The mid level of this enclosure is approximately level to Quaker Street / Braithwaite Street and the upper level similar to that of the Braithwaite Viaduct.

Central Line

- 2.20 The Central Line tunnels diagonally cross the site from the corner of Commercial Street and Quaker Street.

8 – Tracking

- 2.21 The safeguarded route for the proposed 8-tracking scheme would provide an additional two lines into Liverpool Street Station. The Revised Scheme has been designed so as not to prejudice any ‘8-track’ scheme coming forward in the future.

BT Tunnel

- 2.22 A BT tunnel runs north-south across the site almost directly below the line of Braithwaite Street. Surveys show that the 7 feet diameter tunnel runs below the Central Line with a crown level varying from approximately 25m below grade level at Quaker Street to approximately 23m below grade at Bethnal Green Road.

Townscape and Views

- 2.23 The site is affected by two London View Management Framework strategic views from Westminster Pier and King Henry’s Mound. This is in addition to important static and kinetic views from Waterloo Bridge and the South Bank close to Gabriel’s Wharf to St. Paul’s Cathedral.

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**PLANNING
HISTORY**

3.0 PLANNING HISTORY

- 3.1 The site has been the subject of a number of previous planning applications and planning permissions. An overview of the key relevant planning applications relating to the site for each Borough is set out in chronological order below.

Land within LBTH

- 3.2 In 2011, planning permission was granted for the siting of 6 shipping containers for A1 use (in connection with approved temporary shopping facility on adjacent site in Hackney) for a period of up to 5 years (Ref. PA/11/01679). Planning permission was subsequently granted in May 2018 for the retention of the shipping containers ('Boxpark') for up to five years.
- 3.3 In 2011, planning permission was granted for the use of part of the site as a marketing suite and Arts Hub unit for use as a public consultation / exhibition purpose (Use Class D1) for a maximum period of 5 years, car parking and provision of an access ramp (Refs. PA/11/02341 & PA/11/02246).
- 3.4 In 2012, planning permission was granted for the temporary use of vacant unused land for a football centre (Use Class D2) comprising 8 five-a-side and 2 seven-a-side floodlit all-weather football pitches and supporting ancillary facilities (Ref. PA/12/02014). Planning permission was subsequently granted in December 2017 for the retention of the all-weather football pitches and supporting ancillary facilities for a period of 5 years (Ref. PA/17/03240).

Land within LBH

- 3.5 In 2011, planning permission was granted for the installation of 55 recycled shipping containers for part A1, A3 and B1 use together with a further 8 shipping containers for ancillary storage, refuse, recycling and cycle parking along with hard landscaping for a temporary period of up to 5 years (Ref. 2011/0255).
- 3.6 In 2012, planning permission was granted for the temporary use of vacant unused land as a football centre (Use Class D2) comprising 8 five-a-side and 2 seven-a-side floodlit all-weather football pitches and supporting ancillary facilities (Ref. 2012/2053).

The Current Applications

- 3.7 As set out in Section 1.0. identical planning applications for the comprehensive redevelopment of the site were submitted in July 2014 to both LBH and LBTH for determination.
- 3.8 In September 2015, having considered a report on the case, the former Mayor notified LBH and LBTH that he would act as the local planning authority for the purposes of determining the planning and associated listed building applications.
- 3.9 The Stage III Report was published on 8th April 2016 and a public representation hearing was due to be held in April 2016 for the former Mayor to determine the applications.

- 3.10 A summary of the key comments raised in the Stage III Report is enclosed at **Appendix 1**. The Stage III Report set out that the former Mayor strongly supported the principle of redeveloping the site and recognised the potential strategic and local benefits of a well-designed scheme. However, as previously set out, the former Mayor considered that as a result of the inappropriate density, height, massing and layout of the scheme, the proposal would result in some very significant negative impacts on neighbouring amenity and heritage. As such, the Stage III Report advised that in order to address the daylight / sunlight impacts, such a scheme would have to have significantly less height and massing along the north-western edge of the site, in particular.
- 3.11 Following a request from the Applicant to defer the representation hearing in order to work with GLA officers to satisfactorily address the concerns raised, the former Mayor decided to defer the representation hearing for that purpose.
- 3.13 The GLA and both Boroughs subsequently highlighted a list of 16 ‘Joint List of Priorities’ (“Priority Points”) in October 2017 that should be considered in any Revised Scheme for the site, which are summarised below.
1. Re-open the viability assessment in a transparent way, having regard to the Mayor of London’s Housing & Viability Supplementary Planning Guidance, Tower Hamlets’ emerging Viability SPD, and Hackney’s Development Viability Guidance Note. The viability should be assessed on an Existing Use Value plus premium approach, with an independent review.
 2. Deliver a minimum of 35% affordable housing on-site, having regard to BNP Paribas’ 2015 independent assessment of viability, and the future findings of a re-opened viability assessment consistent with this methodology. There should be a fair and reasonable split of affordable housing between the administrative areas of the two Boroughs.
 3. The development should provide a mixed-use development which strikes a positive and appropriate balance between optimising housing numbers and maximising employment space.
 4. The maximum feasible amount of employment space should be provided, to meet the strategic employment function of the Central Activities Zone, City Fringe, Hackney Priority Employment Area, and wider Tech City. At least 10% of employment space to be affordable.
 5. The provision of publicly accessible open space must be truly accessible to all. The publicly accessible open space should be usable, meaningful and well-lit space which is integrated with the wider development.
 6. The development should provide community facilities that would help to deliver a ‘Local or Neighbourhood Presence’ for Tower Hamlets and Hackney, which could include space for access to employment services or initiatives.
 7. The development should provide space for indoor sport and recreation.
 8. The development must be of excellent architectural design.
 9. The proposed towers must integrate into and make a positive contribution to the existing

townscape. There should be a design away from the previous procession of towers, with a reduction in the overall number of towers and increase in separation distances in order to avoid an overbearing impact on townscape, surrounding neighbouring amenity and substantial harm to heritage assets.

10. The proposals for Plots F & G must be of exceptional high-quality design, with slender profiles and proportions with a design-led approach to height. The proposals should have a minimal impact on sensitive views and heritage assets including the Tower Bridge World Heritage site as well as the Elder Street, Brick Lane/Fournier Street, Boundary Estate and Redchurch Street conservation areas, whilst complementing local character.
 11. The overall height of buildings A and B should be reduced in order to be compatible with the local context, including the Tea Building, whilst ensuring there would not be unacceptable impacts on neighbouring amenity in terms of daylight, sunlight and sense of enclosure.
 12. The development should not result in direct and substantial harm to the setting of the listed Oriel Gate and Braithwaite Viaduct by virtue of the location, plot coverage, massing, height and design of the main buildings.
 13. The proposal should align with the existing urban grain to provide permeability and legibility including a secondary east -west link to better reveal the significance of the grade II listed arches along the northern edge of the Braithwaite Viaduct.
 14. The impact on sunlight/daylight should be minimised with an updated assessment undertaken, balanced against a pragmatic approach which recognises the existing open nature of the site in order to achieve acceptable levels of retained light.
 15. The detailed proposals for the listed Oriel Gate and associated structures should not result in direct and substantial harm to this designated heritage asset.
 16. The development should achieve Air Quality Neutral standards.
- 3.14 The Applicant has therefore been working with the officers at the GLA, LBTH and LBH with regard to this Revised Scheme submission to satisfactorily evolve the scheme to address the concerns raised in the Stage III Report and the above Priority Points, for determination by the current Mayor.

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**DEVELOPMENT
PROPOSAL
(THE REVISED
SCHEME)**

4.0 DEVELOPMENT PROPOSAL (THE REVISED SCHEME)

4.1 This section provides a summary of the Revised Scheme, following extensive consultation with the GLA, LBTH and LBH, Historic England and the Local Community following publication of the GLA Stage III Report. A full description of the Revised Scheme for which planning permission is sought, is set out below and also within the revised Development Specification and revised Design and Access Statement submitted as part of the Revised Scheme submission.

4.2 The Revised Scheme submission seeks permission for the following:

LB Hackney Description of Development

“An OUTLINE application for the comprehensive mixed use redevelopment of the site comprising:

- *Residential (Class C3) comprising up to 500 residential units;*
- *Business Use (Class B1) – up to 130,940 m² (GIA);*
- *Hotel (Class C1) – up to 11,013 m² (GIA)*
- *Retail, financial and professional services, restaurants and cafes and hot food takeaways (Class A1, A2, A3 and A5) – up to 18,390 m² (GIA) of which only 3,678 m² (GIA) can be used as Class A5;*
- *Non-residential Institutions (Class D1) / Assembly and Leisure (Class D2) – up to 6,363 m² (GIA);*
- *Public conveniences (sui generis) – up to 298 m² (GIA);*
- *Basement, ancillary and plant space – up to 21,216 m² (GIA);*
- *Formation of new pedestrian and vehicular access; means of access and circulation and car parking within the site; and*
- *Provision of new public open space and landscaping.*

The application proposes a total of 10 buildings that range in height, with the highest being 142.4m AOD and the lowest being 19.0m AOD.

With all matters reserved save that FULL DETAILS for Plot 2 are submitted for alterations to, and the partial removal of, existing structures on the site and the erection of a building for office (Class B1) and retail use (Class A1, A2, A3, A5) comprising a part 17 / part 29 storey building; and Plot 7 A, B, C and D comprising the use of the ground level of the Braithwaite Viaduct for retail and food and drink uses (A1, A2, A3, A5) and works to and use of the Oriel and adjoining structures for retail and food and drink uses (A1, A2, A3, A5).

For that part of the site within LB Hackney, the proposed development comprises the following mix of uses:

- *Up to 109,599 m² (GIA) of Business Use (Class B1);*
- *Up to 4,509 m² (GIA) of Retail Use (Class A1, A2, A3 and A5), of which only 902 m² (GIA) can be used for hot food takeaways (Class A5);*
- *Up to 2,254 m² (GIA) of Class D1 / D2 use;*
- *Up to 12,752 m² (GIA) of ancillary and plant space.”*

LB Tower Hamlets Description of Development

“An OUTLINE application for the comprehensive mixed use redevelopment of the site comprising:

- Residential (Class C3) comprising up to 500 residential units;*
- Business Use (Class B1) – up to 130,940 m² (GIA);*
- Hotel (Class C1) – up to 11,013 m² (GIA)*
- Retail, financial and professional services, restaurants and cafes and hot food takeaways (Class A1, A2, A3 and A5) – up to 18,390 m² (GIA) of which only 3,678 m² (GIA) can be used as Class A5;*
- Non-residential Institutions (Class D1) / Assembly and Leisure (Class D2) – up to 6,363 m² (GIA);*
- Public conveniences (sui generis) – up to 298 m² (GIA);*
- Basement, ancillary and plant space – up to 21,216 m² (GIA);*
- Formation of new pedestrian and vehicular access; means of access and circulation and car parking within the site; and*
- Provision of new public open space and landscaping.*

The application proposes a total of 10 buildings that range in height, with the highest being 142.4m AOD and the lowest being 19.0m AOD.

With all matters reserved save that FULL DETAILS for Plot 2 are submitted for alterations to, and the partial removal of, existing structures on the site and the erection of a building for office (Class B1) and retail use (Class A1, A2, A3, A5) comprising a part 17 / part 29 storey building; and Plot 7 A, B, C and D comprising the use of the ground level of the Braithwaite Viaduct for retail and food and drink uses (A1, A2, A3, A5) and works to and use of the Oriel and adjoining structures for retail and food and drink uses (A1, A2, A3, A5).

For that part of the site within LB Tower Hamlets, the proposed development comprises the following mix of uses:

- Up to 44,067 m² (GIA) of residential use (Class C3);*
- Up to 21,341 m² (GIA) of Business Use (Class B1);*
- Up to 11,013 m² (GIA) of Hotel Use (Class C1);*
- Up to 13,881 m² (GIA) of Retail Use (Class A1, A2, A3, A5) of which only 2,776 m² (GIA) can be used for hot food takeaways (Class A5);*
- Non-residential Institutions (Class D1) / Assembly and Leisure (Class D2) – up to 4,109 m² (GIA);*
- Up to 298 m² (GIA) of sui generis use;*
- Up to 8,464 m² (GIA) of ancillary and plant space.”*

- 4.3 The Revised Scheme also includes works which require listed building consent and therefore revised applications under the Planning (Listed Building and Conservation Areas) Act 1990 for listed building consent, have been submitted for the following:

Listed Building Consent Application (Plot 7 B, C, D)

“Restoration and repair of the existing Grade II listed Braithwaite Viaduct and adjoining structures for proposed Class A1/A2/A3/A5/D1/D2 and sui generis use at ground level. Structural interventions proposed to stabilise London Road structure, removal of sections of London Road roof to create openings over proposed new public squares; formation of new shopfront openings,

installation of new means of public access up to park level. Part removal of adjoining unlisted wall on Brick Lane to provide improved public realm and pedestrian access into the site.”

Listed Building Consent Application (Plot 7A)

“Restoration and repair of existing Grade II listed oriel and gates, and adjoining historic structures to provide principal western pedestrian gateway into scheme and to accommodate proposed Class A1/A/2/A3/A5/D2 use into a number of the existing arches at ground floor. Part removal of a section of adjoining unlisted structures proposed to provide improved public realm and pedestrian access into the site.”

- 4.4 The revised Development Specification sets out the proposed floorspace for the different land uses within the Revised Scheme.

THE GOODSYARD

CONSULTATION

5.0 CONSULTATION

- 5.1 The Applicant and consultant team have consulted extensively with officers from the GLA, Transport for London, LBH and LBTH, Historic England and also with the local community and interested parties.
- 5.2 In addition, the Revised Scheme submission has been presented on two occasions to the Mayor's 'Design Advocates Panel' in September 2018 and March 2019. In addition, the emerging Revised Scheme has been presented to a Joint Borough Design Review Panel in January 2019.
- 5.3 A summary of the comments received from the respective Design Panels is set out below:

LB Hackney and LB Tower Hamlets Joint Design Review Panel (January 2019)

- The panel recognised the complexity of the site and commended the applicants and their design team for the degree of positive change introduced to the scheme, particularly in terms of site permeability and building scale. Overall it was thought that the proposals had improved considerably.
- The panel were pleased at the improvements to site permeability. In particular, the introduction of a new east-west route passing to the north of the listed arches was considered to be a major step forward. It was also thought that the threshold spaces at either end of the site, on Shoreditch High Street and Brick Lane, would work well.
- Welcomed the overall reduction in the scale and massing of buildings across the site.
- Whilst the height of the building on Plot 2 could be considered acceptable, it was thought that in some views the building would appear excessively bulky to the detriment of the local townscape.
- In terms of plot one, the sensitivity of the relationship with the Tea Building was raised;
- Concern about the quality of some of the residential accommodation that would be placed either side of the overground railway box.
- Impressed with the way that the narrative of the platform level public spaces had evolved.
- It was noted that the total amount of public space has increased by 25%.
- Encouraged by the proposals for the refurbishment of the non-designated heritage assets on Sclater Street.
- Consider the impact that the building on plot two would have on the setting of the Oriel Gateway due to the close proximity.

Mayor's Design Advocates Panel (September 2018)

- 5.4 A summary of the Mayor's Design Advocates Panel held in September 2018, included the following:
- Much to admire in the evolving development proposals for Bishopsgate Goodsyards, and the fresh thinking that is evident in the revised designs;
 - Welcomed the reduced scale and massing, which has potential to improve townscape quality, daylight, sunlight and views protected by the London Views Management Framework (LVMF) – as well as optimising viability by avoiding the need for large structures spanning the railway.

- A more confident approach to the design of new buildings and spaces would be appropriate in response to the extraordinary Braithwaite Viaduct.
- The creation of a significant new public space at on top of the existing viaduct is one of the most exciting elements of the scheme.
- The panel is broadly supportive of the revised scale and massing – subject to testing of sunlight, daylight and townscape views.
- Fine tune the development’s massing for example, to enhance its relationship with the Tea Building.
- The massing of the taller commercial building to the west of the site needs to be considered in context with suitable analysis to inform their massing, including how they meet the ground / podium and their skyline.
- The opening up of London Road beneath the historic viaduct running east west across the site promises to create a uniquely characterful new public route.
- Supported the concept of pop up units animating London Road below the viaduct, where it is open to the railway.
- With access from street level via steps and lifts, there is a risk the upper level public spaces may not be well used enough to feel safe at night – although the hotel at this level should help generate activity.
- Additional residential accommodation could help ensure the upper level spaces are well populated and support passive security.
- Understands the importance of maximising the provision of residential accommodation, including affordable housing, there may be some benefits in the hotel use, which could help animate the upper level public space.

5.4 A public exhibition was held in November 2018 and a second exhibition was held at the beginning of March 2019. A full report of the local community consultation process and feedback is included in the revised Statement of Community Involvement, which is submitted in support of the Revised Scheme submission.

5.5 The Proposed Amendments were also presented to the LB Hackney Pre-Application Planning sub-committee on 30th January 2018 where Members of the committee were able to comment on the Revised Scheme.

THE GOODSYARD

**PLANNING
POLICY
CONTEXT**

6.0 PLANNING POLICY CONTEXT

- 6.1 This section of the report identifies the relevant planning policy context upon which the Revised Scheme submission is to be assessed, being the NPPF and Development Plan as identified within the Town and Country Planning Act 1990 (as amended).

National Policy

- 6.2 National planning policy is set out in the National Planning Policy Framework (NPPF), which was updated on 19th February 2019. At the heart of the NPPF is a presumption in favour of sustainable development (paragraph 11), with three overarching objectives: economic, social and environmental. These are to be delivered through the preparation and implementation of plans and the application of the policies within the Framework.
- 6.3 This means approving development proposals that accord with the development plan without delay and where the development plan is absent, silent or out of date, granting planning permission unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits of development, or specific policies in the NPPF indicate otherwise.
- 6.4 The National Planning Policy Guidance (NPPG) was published in March 2014 and updated in July 2018 and sits alongside the NPPF. The NPPG adds further context to the NPPF and should both be read together.
- 6.5 The NPPF sets out key policies on delivering sustainable development, which include:
- Chapter 6 (Building a Strong, Competitive Economy) notes that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.
 - Chapter 8 (Promoting Healthy and Safe Communities) sets out the importance of access to high quality open spaces, opportunities for sport and recreation and ensuring spaces are safe and accessible, so that crime and disorder, and the fear of crime do not undermine the quality of life or community cohesion.
 - Chapter 9 (Promoting Sustainable Transport) requires transport policies to be balanced in favour of sustainable transport modes with the appropriate Transport Assessment or Transport Statement provided. Decisions must take account of whether the opportunities for sustainable transport modes have been taken up, depending on the nature and location of development and whether improvements can cost effectively limit the significant impacts of the development.
 - Chapter 10 (Supporting High Quality Communication) identifies that advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being.
 - Chapter 11 (Making Effective Use of Land) notes that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.
 - Chapter 12 (Achieving well Design Places) states that the creation of high quality buildings and place is fundamental to what the planning and development process should achieve. Good design

is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.

- Chapter 14 (Meeting the Challenge of Climate Change, Flooding and Coastal Change) outlines the key role that planning has in helping to shape places to secure radical reductions in greenhouse gas emissions, minimising vulnerability and providing resilience to the impacts of climate change, and supporting the delivery of renewable and low carbon energy and associated infrastructure. This is described as central to the economic, social and environmental dimensions of sustainable development.
- Chapter 15 (Conserving and Enhancing the Natural Environment) places great emphasis on enhancing and protecting the natural environment; minimising impacts on biodiversity and providing net gains in biodiversity where possible and preventing new development from contributing or being put at unacceptable risk from soil, air, water and noise pollution by remediating and mitigating where appropriate. This policy encourages the effective reuse of brownfield land provided that it is not of high environmental value.
- Chapter 16 (Conserving and Enhancing the Historic Environment) places emphasis on the preservation and enjoyment of the historic environment. There is recognition that heritage assets are irreplaceable resources and that they should be conserved in a manner appropriate to their significance and provides guidance to LPA's in determining applications that may affect heritage assets or their setting.
- The NPPF outlines that LPA's should approach decision taking in a positive way to foster the delivery of sustainable development. The right information is crucial to good decision-taking, particularly where formal assessments such as EIAs are required. This includes participation of other consenting bodies to enable early consideration of all the fundamental issues.

Development Plan

- 6.6 Section 38(6) of the Planning and Compulsory Purchase Act 2004 (as amended) and Section 70(2) of the Town and Country Planning Act 1990 states that the determination of planning applications should be made in accordance with the Development Plan unless material considerations indicate otherwise.

London Borough of Tower Hamlets

- 6.7 The Development Plan for LBTH comprises the London Plan (2016), the LBTH Core Strategy (2010) and the LBTH Managing Development Document ("LBTH MDD") (April 2013). The following LBTH supplementary planning documents are also relevant:
- The LBTH Planning Obligations SPD (2016)
 - The LBTH CIL Charging Schedule (2015)
- 6.8 The Tower Hamlets Local Plan is undergoing an independent public examination, following its submission to the government in February 2018. The examination hearings ran from 6-21 September to 11-12 October 2018. The inspector is now proposing a number of changes to the plan in the light of the hearings and is inviting comments on them. This consultation runs from 25 March until 5pm on 9 May 2019.
- 6.9 The site falls within the following LBTH site designations:

- London View Management Framework (Westminster Pier to St. Paul's Cathedral and King Henry's Mound to St. Paul's Cathedral);
- Central Activity Zone (CAZ);
- Site Allocation Ref. SA1;
- Close proximity to the Cycle Super Highway;
- Site includes Statutory Listed Buildings.

6.10 The site is also identified within the MDD as 'Site Allocation 1 (SA1 - Bishopsgate Goods Yard)' and is allocated for:

"a comprehensive mixed-use development opportunity required to provide a strategic housing development, a local park, an Idea Store and a district heating facility (where possible). The development will also include commercial floorspace and other compatible uses."

6.11 The site allocation sets out a number of design principles in which proposed development should accord with. These are detailed below:

- *"Respect and be informed by the existing scale, height, massing and fine urban grain of the surrounding built environment."*
- *Focus larger scale buildings around Shoreditch High Street Over-ground Station.*
- *Walking and cycling routes should be improved to, from and created within the site to establish connection to Shoreditch High Street Overground Station, the new Local Park and Brick Lane District Centre. These should align with the existing urban grain to support permeability and legibility.*
- *Integrate with the Green Grid along Quaker Street and Brick Lane.*
- *Provide a range of new publicly accessible open spaces including a local park above the Braithwaite Viaduct.*
- *Protect, enhance and integrate heritage assets on site and in the surrounding areas, including within the London Borough of Hackney.*
- *Focus public realm improvements along Wheeler Street and the two new public squares to the east and south of the station."*

6.12 The site allocation also identifies the indicative development capacity for the site, which equates to an approximate total of 350,000 m² of development, comprising:

- *"Up to 2000 homes;*
- *Approximately 75,000 – 150,000 m² of employment, retail and community uses;*
- *Approximately 1.8 hectares of publicly accessible open space."*

London Borough of Hackney

6.13 The Development Plan for LBH comprises of the London Plan (2016), the Core Strategy (2010), the Development Management Local Plan (2015), the site Allocations Local Plan (2016) and Policies Map. The following LBH supplementary planning documents are relevant:

- Affordable Housing Supplementary Planning Document (2005)
- Planning Contributions Supplementary Planning Document (2015)
- South Shoreditch Supplementary Planning Document (2006)
- The draft Future Shoreditch Area Action Plan (2019)

6.14 The new borough-wide local plan 2033, known as LP33, will be the key strategic planning document used to direct and guide development in the borough up to 2033. Our aim is to make sure that the right amount of development is built in the right place at the right time so that the future needs of the borough are met. On 23 January 2019, Hackney's Local Plan 2033 was submitted to the planning inspectorate for examination.

Site Designations

6.15 The site falls within the following LBH Local Plan site designations:

- Site Allocation 108 (SALP);
- Central Activities Zone (CAZ);
- City Fringe Opportunity Area;
- Shoreditch Archaeological Priority Area;
- Strategic View Background Area (Westminster Pier to St. Paul's Cathedral and King Henry's Mound to St. Paul's Cathedral); and
- Shoreditch Priority Employment Area (PEA).

6.16 The site is also identified as falling within the 'Tall Buildings Opportunity Area' within the Core Strategy (Map 8.1).

6.17 The site is identified as 'Allocation 108 (Bishopsgate Goodsyards, Shoreditch High Street)'. The document identifies the site as having a medium-term development programme and is identified as: *"A major development opportunity and should be developed in cooperation with the London Borough of Tower Hamlets and in accordance with the Bishopsgate Goods Yard Interim Planning Guidance 2010"*.

6.18 The site is identified as having the following allocation:

"Office-led mixed use including residential, retail and public open space may be appropriate in the site. The site lies within the Central Activities Zone and the Shoreditch Priority Employment Area. Taller buildings may be appropriate on the site, subject to site and surrounding area considerations. Furthermore, the north east section and a small part of the south west corner of the site fall within the background area of two strategically important views. These are Westminster Pier to St Paul's Cathedral and King Henry's Mound to St Paul's Cathedral. The viaduct, oriel and forecourt wall fronting the historic viaduct should be re-sued and incorporated into any redevelopment. A park is proposed on the Tower Hamlets' side of the larger site, and as part of the overall scheme children's play facilities should be included. The development of the site will need to incorporate and factoring the South Shoreditch Overground station viaduct."

- 6.19 The site is identified within the South Shoreditch SPD as an opportunity area (Opportunity Area 22) for high density mixed used development. In particular the SPD identifies the site as an opportunity area for tall buildings. Section 5.5, paragraph 5.5.1 states *“Bishopsgate Goodsyards will be a future landmark and development node, which will impact significantly on the area identified within figure 5 (legibility) as a site for a future land mark development node”*.
- 6.20 The SPD also sets out a number of design principles for the South Shoreditch Area. The design principles applicable to the Goodsyards site are details below:
- *“Introducing new business and residential uses in the area;*
 - *Reinforcing the diverse range of uses in the area, particularly in the vicinity of Spitalfields Market;*
 - *Bishopsgate Goodsyards is located within the Tall Building Opportunity Area and as such is an appropriate location for tall buildings outside strategic viewing corridors stepped back from street frontages and subject to design quality;*
 - *The tallest building would be best placed on the western part of the site decreasing in height as the site narrows towards Brick Lane to the east; and*
 - *Provision of open space at Bishopsgate Goodsyards to form an integral part of north-south and east-west routes and linkages through the site helping to connect the site with Shoreditch High Street in particular. The Council would seek a landmark structure to the site on the High Street.”*

Draft Future Shoreditch Area Action Plan

- 6.21 LBH are in the early stages of preparing an Area Action Plan for Shoreditch, called ‘Future Shoreditch’. The plan will set out a vision for what Shoreditch will look like in 2033 and the planning policies to guide and manage future development and investment in the area. Once adopted, this plan will be an important document when making planning decisions in Shoreditch.
- 6.22 The draft Future Shoreditch Area Action Plan was published for public consultation until 21st June 2019.
- 6.23 The draft Future Shoreditch Area Action Plan was endorsed by Cabinet for consultation on 25th February 2019. The document identified the site as FSOS 10 (Bishopsgate Goodsyards). It states that:
- *“Significant opportunity for optimising density with a mixed-use development that provides a balance between maximising employment floorspace (including affordable workspace) and optimising housing (including genuinely affordable housing).*
 - *At least 50% of proposed floorspace should be for employment uses, including the provision of affordable workspace in line with the relevant borough employment policies.*
 - *Provision of a range of employment floorspace unit sizes, including small-to-medium sized units.*
 - *Redevelopment should also seek to optimise the amount of housing, including genuinely affordable housing. Hackney Council seeks a fair and reasonable split of affordable housing nominations between the two Boroughs.*
 - *Provision of range of dwelling unit sizes including family accommodation in line with relevant borough housing policies and site allocation requirements.*

- *Redevelopment should secure the provision of a minimum of 1ha of strategic open space consolidated and integrated with the green grid along Quaker Street and Brick Lane in the form of a multi-functional local park above the Braithwaite Viaduct.*
- *Redevelopment should secure the provision of a new community facility on a prominent route, suitable for local employment initiatives.*
- *In addition to new strategic open space, new leisure facilities should be provided.*
- *Creative reuse of the unique spaces within the site's special heritage assets including interpretation of the Braithwaite Viaduct and Oriel Gates will help to maintain and celebrate the sites heritage. Retail, leisure, arts, cultural and/or community uses are all likely to have an important role to play in this regard.*
- *Redevelopment proposals should seek to address all street frontages around the site's perimeter, improving street frontages and public realm on key routes, particularly along Wheler Street.*
- *Improved walking and cycling routes including connections to:*
 - *Shoreditch High Street Railway Station*
 - *Shoreditch High Street / Commercial Street*
 - *Brick Lane district town centre*
- *Create legible and permeable urban grain which aligns with existing streets and blocks including a central east/west pedestrian route.*
- *Protect or enhance heritage assets on and surrounding the site and sensitively consider impacts on the nearby conservation areas, strategic and local views. This includes local views from conservation areas within LB Tower Hamlets, such as the sensitive view looking north along Elder Street.*
- *Respond positively to the existing scale, height and massing and fine urban grain of the surrounding built environment.*
- *Building heights should respect the prevailing building heights along Shoreditch High Street, and gently rise towards the centre of the site, nearest the entrance to the railway station.*
- *Improve biodiversity and ecology with the open space and green infrastructure.*
- *Major opportunity to establish an important piece of public realm in the form of a large linear city park (minimum 1ha).*
- *Running east - west and facing south the park would celebrate the unique heritage assets of the site by sitting above the Braithwaite Viaduct.*
- *A public street would run east to west alongside the viaduct, revealing the arches which would accommodate retail and light industrial uses.*
- *103,000 sqm GEA of office floorspace (total, of which 84,000 provided within Hackney).*
- *39,000 sqm retail/community space (total, of which 10,000 sqm provided within Hackney).*
- *700 residential units (total, with a minimum 500 units provided within Tower Hamlets)."*

6.24 Further formal public consultation is expected to take place in Spring 2019. Therefore, due to the infancy of this document, it can only be given limited weight for planning purposes when assessing the Revised Scheme.

The Bishopsgate Goodsyrd Interim Planning Guidance

6.25 In 2010 the Mayor, Hackney and Tower Hamlets Councils jointly adopted the Bishopsgate Goodsyrd Interim Planning Guidance (BGY IPG). The BGY IPG provides a framework for regeneration of the site and sets out the following key principles:

- Contribute to supporting London's financial and business services
- Strengthen the local economy in Shoreditch and Spitalfields
- Significantly contribute to local housing need
- Provide an exciting place to live, work or visit
- Be a place to be enjoyed by existing and new communities
- Make the best use of excellent public transport access

6.26 The IPG also sets out how development on the site should connect with the existing surrounding development, the importance of new open spaces, the requirement for sustainable transport and sustainable design, the re-use of historic structures and the need to strengthen local character. In relation to building heights, the IPG highlights that larger scale buildings should be focused around the station with medium scale buildings on the transition to Shoreditch High Street, and towards the centre of the site reducing to a 'street' scale to the east. The document details design guidelines for the proposals and the importance of local and strategic views. It supports the creation of a park on the Braithwaite Viaduct and identifies that the sites development capacity is 1,000-2,000 new homes and 75,000 – 150,000 sqm of non- residential floorspace. It indicated that the land use layout should provide for commercial to the west of the site within Hackney and residential space to the north of the site predominately in Tower Hamlets, with retail at ground floor around the site. It also indicated provision of a new public square, arranged diagonally across the west of the site from Bethnal Green Road to Commercial Street.

6.27 Given that the IPG was published nine years ago and although it provides a set of design and masterplan principles, reduced weight has been given to it when assessing the Revised Scheme.

The London Plan

6.28 The London Plan (2016) is the overall strategic plan for London, setting out an integrated economic, environmental, transport and social framework for the development of London over the next 20 – 25 years.

6.29 In December 2017, the Mayor of London published a draft New London Plan for consultation which ended on 2nd March 2018. In accordance with section 338(3) of the GLA Act, the Secretary of State has appointed a Panel to conduct an examination in public ("EIP") of the London Plan. The Mayor may suggest changes to the draft London Plan in response to the representations received, issues and questions raised by the Panel, or discussions at the EIP. The EIP commenced in January 2019 and as such consideration has been given within this note to the emerging policies in the draft London Plan.

6.30 The GLA has also produced a number of guidance documents which amplify London Plan policy and are relevant to the Revised Scheme. These documents are material considerations but do not form part of the Development Plan. The relevant documents include:

- Homes for Londoners Affordable Housing and Viability SPG (2017)
- The City Fringe Opportunity Area Planning Framework (2015)
- Social Infrastructure (2015)
- Accessible London: Achieving an Inclusive Environment (2014)

- Housing SPG (2016);
- Shaping neighbourhoods: Play and Informal Recreation (2012);
- Character and Context (2014)
- Planning for equality and diversity in London SPG (2007);
- Sustainable design and construction SPG (2014);
- London World Heritage sites (2012)
- London View Management Framework (2012); and
- Central Activities Zone (2015)

City Fringe OAPF

- 6.31 The Mayor of London adopted the City Fringe Opportunity Area Framework (OAPF) in December 2015 which sets out strategies for development opportunities which have scope to not only support London's financial and business services but also the diverse cluster of digital-creative businesses in an expanding Tech City.
- 6.32 The Bishopsgate Goodsyards site is identified as a key site within the inner core area and the largest brownfield site within the City Fringe, where demand for workspace is currently highest as the business clusters of the Central Activities Zone, particularly the 'Tech City' digital-creative cluster, continue to expand. As such, development is expected to include a significant commercial floorspace within a mix of other uses, including residential.
- 6.33 The City Fringe OAPF takes account of the housing capacity estimates used in the Strategic Housing Land Availability Assessment (SHLAA) and therefore acknowledges the important role the site can play with regards to housing delivery, giving guidance on balancing this with delivery of commercial floorspace. The site is identified as being suitable for tall buildings.

THE GOODSYARD

**PLANNING
POLICY
ASSESSMENT**

7.0 PLANNING POLICY ASSESSMENT

7.1 This section of the statement assesses how the Revised Scheme will be considered and assessed within the context of the planning policy framework under the following headings. These assessments consider how the proposed development has evolved to address the comments set out in the GLA Stage III Report, and the joint priorities issued by the Borough and the GLA.

a) Site Suitability

- Principle of Development
- Regeneration Benefits

b) Proposed Land Uses

- Residential Use (Class C3)
 - Residential Mix
 - Affordable Housing
 - Residential Density
 - Residential Standards
- Business Use (Class B1)
 - Policy Review
 - Type of Employment Space
- Retail Use (Class A1, A2, A3, A5)
- Hotel Use (Class C1)
- Non-residential Institutions (Class D1), Assembly and Leisure (Class D2) & ‘Sui Generis’ Uses

c) Public Realm and Landscaping

- Public Realm
- Child Play space

d) Design

- Site Layout
- Quality of Design
- Tall buildings

e) Townscape and Visual Impact

f) Historic Environment

- On-site Designated Heritage Assets
- Heritage Benefits
- On-site Listed Structures
- Effects of the Revised Scheme on Site Context

g) Transport

- Car parking

- Delivery and Servicing Plan
- Cycle Parking

h) Environmental Considerations

- Microclimate
- Water Resources, Flood Risk and Drainage
- Air Quality
- Social Infrastructure
- Socio-Economics
- Archaeology
- Daylight, Sunlight and Overshadowing

i) Energy and Sustainability

Site Suitability

Principle of Development

- 7.2 The Goodsyrd site is of strategic importance to London and as such it is expected to deliver significant development and play an important role in the ongoing regeneration of this part of inner east London. The Stage III Report noted that the former Mayor, *“supports the principle of redeveloping the Bishopsgate Goodsyrd site and recognises the potential benefits of a well – designed scheme which seeks to optimise densities in this Central London location.”*
- 7.3 The site is located within the ‘City Fringe / Tech City Opportunity Area’ (“OA”) as identified in the London Plan. Policy 2.13 of the London Plan relates to OAs and states that development proposals within such areas should:
- Support the strategic policy directions for OAs;
 - Seek to optimise residential and non-residential densities and where appropriate contain a mix of uses;
 - Contribute towards meeting (or where appropriate, exceeding) the minimum guidelines for housing and/or employment capacity; and
 - Support wider regeneration (including in particular improvements to environmental quality) and integrate development proposals to the surrounding areas especially areas for regeneration.
- 7.4 The OA is identified within the London Plan as an area for significant growth over the next 20 years and the London Plan sets a target of a minimum of 8,700 new homes (and 70,000 new jobs) by 2036. This is recognised in the Mayor of London’s ‘2020 Vision’ within which specific reference is made to the future regeneration of Shoreditch and the site in particular.
- 7.5 Policy 2.11 of the London Plan encourages a range of uses within the Central Activities Zone (“CAZ”) and states that where a development proposes an increase in office floorspace, proposals should include a mix of uses including housing. Policies 2.10 and 2.11 of the London Plan also seek to support and improve the retail offer of the CAZ residents, workers and visitors.

- 7.6 Located within the City Fringe and the Central Activity Area, the site is in a strategic location identified to play its part in London's growth and intensification through the regeneration of its redundant land to provide a vibrant new high-density urban community.
- 7.7 The western end of the site is located within a Priority Employment Area, as designated by Hackney Council's DMLP proposals map and is within the area covered by the South Shoreditch Supplementary Planning Document (SSSPD). The site is also identified as Site Allocation 108 in the Hackney Site Allocation Local Plan document, where it is identified as a major development opportunity capable of delivering employment-led (on that part within Hackney) mixed-use development with supporting uses including residential, retail and public open space.
- 7.8 The Bishopsgate Goodsyrd site is identified as Site Allocation 1 within the LBTH Managing Development Document. The allocation notes the site is suitable for a comprehensive mixed-use development to provide a strategic housing, a local park, an Idea Store, commercial floor space and other compatible uses.
- 7.9 It is recognised by LBH, LBTH and the GLA through planning policy that the site is the largest brownfield redevelopment site within the OA, with the potential to deliver substantial levels of residential, office and retail accommodation to serve the ever growing working and residing population. However, despite the central London location of the site, with excellent links to public transport, certain site constraints have hindered the redevelopment of the site and as such it has remained vacant for circa. 50 years.
- 7.10 The site constraints have dictated the formation of the development principles in regard to the layout and location of buildings on the site. As previously described, the significant site constraints described in Section 2 mean that it is only possible to found buildings on one third of the site area. This has resulted in significant difficulties when formulating a viable scheme for the redevelopment of the site in its entirety. This is just one of the reasons the site has been left vacant for approximately 50 years.
- 7.11 The Revised Scheme submission has been informed by an evolution of the site-wide masterplan concept, based on discussions with the LBTH, LBH and the GLA, that has taken into account their comments and the unique circumstances of the site to provide a sustainable mix of uses which include new housing, hotel, retail, offices, public open space, community and leisure uses. The Revised Scheme will deliver a significant number of new homes (up to 500), including a significant proportion on-site affordable housing within LBTH and jobs on a strategically important large brownfield site that is identified as a major development opportunity.
- 7.12 The regeneration of the site for a high density, residential-led mixed use scheme is entirely consistent with all levels of planning policy, namely:
- The NPPF promotes mixed use development on previously developed land.
 - The London Plan and the City Fringe OAPF all support proposals that optimise density, increase housing supply and contribute to employment and housing targets within the CAZ and the Opportunity Area.
 - The site has consistently and continues to be specifically identified as a major development opportunity within LBH and LBTH Core Strategies and emerging Development Plan Documents.

- 7.13 The thrust of the planning policies seeks the provision of residential accommodation (including affordable housing) and a mix of non-residential uses providing a range of employment led opportunities, significant public realm and landscaping, set within a high-quality designed masterplan.
- 7.14 The principle for the redevelopment of the site for a high-density mixed-use scheme therefore fully complies with the objectives of the NPPF, the London Plan and LBTH and LBH policies which establish the suitability of the site for a residential-led mixed use development, namely within the LBTH MDD and LBH SALP policy documents.
- 7.15 The provision of new housing supply within the CAZ that optimises densities and contributes towards the London Plan housing targets is wholly appropriate in terms of regional and local planning policy. Furthermore, the provision of a range of employment led opportunities for a mix of employment uses, encouraging flexible workspaces and provision of units for small and medium businesses is supported at all levels of planning policy and are key drivers in regeneration.

Regeneration Benefits

- 7.16 A revised Regeneration Statement which is submitted in support of the Revised Scheme which sets out the significant regenerative benefits of the Revised Scheme. The revised statement also includes an updated assessment of the benefits brought by the mix of proposed uses and the new public area, which in itself will be a significant driver for the regeneration of the surrounding area.
- 7.17 The Revised Scheme will regenerate a central London site that has remained vacant for approximately 50 years to provide a range of site-specific regeneration benefits and also benefits to the wider surrounding area, and will:
- Significantly contribute to local regeneration, including local employment opportunities;
 - Create new jobs through both the construction and operational phases of the Revised Scheme;
 - Increase London's supply of quality housing;
 - Facilitate the development of on-site affordable housing;
 - Improve the provision of local retail and community facilities;
 - Improve and enhance public realm, particularly open space in the area, providing new opportunities for recreation, community interaction and enjoyment;
 - Increase permeability of the site, facilitating improved pedestrian movement and access within the local area;
 - Restore the historic fabric of the site, enhancing structures and emphasising historical past and previous uses of the site;
 - Create active and engaging street frontages which improve the local environment and streetscape, and encourage a feeling of safety, particularly at night; and
 - Provide a mix of uses to facilitate the delivery of this strategic site, resulting in local benefits including job creation and a new park.
- 7.18 A summary of the benefits of the Revised Scheme both during the construction phase and the operational phase, include the following:

- Delivering a landmark development located at a strategically important site within LBH and LBTH;
- Bringing a derelict brownfield site back into productive use, encouraging confidence in the market;
- Construction of up to 500 high quality new homes, significantly contributing to the target of 3,931 new build homes annually in LBTH, as well as provision of 50% on-site affordable housing within LBTH;
- An estimated 379 FTE net construction employment jobs, representing Gross Value Added (GVA) of £24m per annum during construction;
- An estimated 9,759 net operational phase jobs (under a Tower Hamlets only development scenario), representing a GVA of £741m per annum during the operational phase;
- Providing a considerable quantity of high quality public open space, and landscaped public realm at street level, which will act as a catalyst for regeneration, attracting visitors and creating an active and vibrant destination where local residents, employees and visitors can interact;
- Improved access between Brick Lane and Shoreditch High Street via the park, and development of a more legible and accessible public realm within and surrounding the site, enhancing permeability and pedestrian movement, and encouraging the feeling of safety and security in the area;
- New local facilities including retail units and other employment floorspace, offering a range of unit sizes which can provide accommodation for a range of businesses, from large occupiers, SME's to small local entrepreneurs;
- Restoration of key historic elements of the site, including a streetscape which celebrates the unique culture of Shoreditch, referencing historic street patterns, the old Shoreditch Terminus, and the Bishopsgate Goodyard;
- Contributions to the provision and improvement of local community infrastructure through CIL and planning obligations, which will likely include contributions towards education; employment and enterprise opportunities (including improving access to employment); health facilities; the public realm; highways and transport; and libraries, community and leisure facilities;
- Support to ensure local people can access employment opportunities, working with LBH and LBTH and other local partners to provide a range of employment and procurement initiatives, including the use of local materials and suppliers where possible. Targeted pre-employment training, skills development and recruitment initiatives will also be implemented and relationships with local schools will be developed in order to promote careers in the construction industry;
- Delivery of a scheme which adheres to high energy efficiency and sustainability standards, using Air Source Heat Pumps (ASHP), Photovoltaics (PV), Sustainable Urban Drainage Systems (SUDS), inbuilt water saving devices, dedicated waste management schemes and recycling areas; and
- Promotion of sustainable transportation through significantly improved connectivity and permeability through the site and local area, as well as cycle parking spaces for residents, employees and visitors.

7.19 Overall, the Revised Scheme would contribute positively to regeneration locally through the following:

- Provision of new, high quality, employment floorspace would help to attract new businesses to the area, and also contribute to aims outlined in the LBH and LBTH Core Strategies to encourage mixed use development, helping to revitalise the area.
- Provision of a mix of high quality retail premises would increase the range of facilities available to the local population and potentially help meet the needs of new businesses at the site, boosting the local economy.
- In terms of local employment benefits, in addition to the proposed office floorspace, retail premises

tend to draw their employment base locally which should lead to increased employment opportunities for residents.

- 7.20 The provision of a significant and new public open space has the potential to create a visitor destination locally, and within Greater London. This is likely to have a positive economic impact for retailers at the Revised Scheme, due to high visitor footfall and may also serve to benefit regeneration locally.
- 7.21 The provision of the park as an area of significant public realm is strongly promoted in all local planning policy documents, including the LBTH MDD and the LBH SALP. The Revised Scheme clearly meets that objective.
- 7.22 The Revised Scheme will provide significant regeneration benefits for the surrounding area, which is wholly in line with the principles set out in planning policy and will deliver a sustainable mixed and balanced community in a central London location prioritised for growth at a strategic and borough levels.

Proposed Land Uses

Residential Use (Class C3)

- 7.23 The NPPF sets out that Local Planning Authorities should:
- Give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land;
 - Promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained, and available sites could be used more effectively;
 - Use their evidence base to ensure the Local Plan meets the needs for market and affordable housing;
 - Identify and update annually a supply of specific deliverable sites that are sufficient to provide five years' worth of housing. These are to have a recommended buffer of 5% to allow choice and competition in the market place;
 - 10% where the local planning authority wishes to demonstrate a five-year supply of deliverable sites through an annual position statement or recently adopted plan; or
 - 20% where there has been significant under delivery.
- 7.24 The NPPF requires that housing applications should be considered in the context of the presumption in favour of sustainable development. Relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five-year supply of deliverable housing sites.
- 7.25 London Plan Policy 3.3 highlights the pressing need for more homes in London and states that local planning authorities should seek to achieve and exceed the relevant minimum borough annual average housing target. By way of achieving housing supply the policy explains that local planning authorities should look to the potential of brownfield land, opportunity areas, intensification areas and growth corridors.

- 7.26 The site is located within an Opportunity Area ('OA'), recognised as an area to accommodate a significant number of new homes. The London Plan now sets an increased target of 8,700 new homes for the OA by 2036. The site is also identified as a strategic housing allocation in the Site Allocation 1 of LBTH MDD and site allocation 108 of LBH SALP.
- 7.27 The London Plan annual housing monitoring target for LBTH is 3,931 new homes. Over a five year period required by the NPPF, this equates to 19,655 new homes. LBTH has also included an additional buffer of 5% to the five year housing target, which overall equates to a target delivery of 20,638 new homes.
- 7.28 As a result of discussions carried out with the GLA, LBH and LBTH with regard to optimizing the quantum of residential units on the site, a 'Residential Optimisation Study' has been undertaken which is included as an Appendix to the submitted Design and Access Statement.
- 7.29 The starting point of the Revised Scheme included 180 residential units and as a result of optimising the residential element, the study (and the Revised Scheme now proposes) that an absolute maximum of up to 500 policy compliant residential units could be delivered. Clearly, it is key that as part of the Revised Scheme Submission, an acceptable level of massing and building height of residential blocks is maintained to address the previous concerns raised by the GLA in the Stage III Report regarding a *"wall of development along the northern edge of the site"* and the associated impacts. In addition, as previously set out, there are significant on-site constraints which restrict the height and position of buildings within the site to deliver a satisfactory residential environment for future occupiers of the site.
- 7.30 It should also be noted as set out in the submitted Design and Access Statement, a previously proposed building (Plot 9) provided additional residential accommodation at podium level. However, through discussions with LBTH, the Borough priority for this part of the site is for additional open space, rather than residential units. As such, this building was removed from the emerging Revised Scheme in order to deliver one of the key objectives of LBTH and the site to provide open space.
- 7.31 The table below summarises the current position with regards to unit numbers that the project team have identified as being achievable within the maximum parameters, whilst creating a vibrant mix of uses:

Maximum Provision (Residential units)	
Sclater Street	214
Plot 8	133
Plot 10	125
Additional Site wide efficiencies	28
Total	500

- 7.32 As such the Revised Scheme will provide a significant quantum of much needed residential accommodation to meet the needs of the local area. The vision for the scheme is to create a new urban community which reflects the local character of the area and the community that lives within it.

- 7.33 The Stage III Report states that there is a “*need to provide more homes and provide a real choice for Londoners in ways that meet their needs, and at a price they can afford*”. The report also acknowledges that part of the site is located within the Hackney Council’s PEA and as such this element should come forward as an employment led scheme, “*the site is designated as a PEA on the Hackney side of the borough boundary. As such, Hackney would support an employment-led proposal and they have commented that this is not the case with the current proposals*”.
- 7.34 The Revised Scheme has evolved which has meant a reduction in the proposed number of residential units from 1,356 to up to 500 units, all located within the LBTH, in favour of an employment led scheme that will deliver up to 130,940 m² (GIA) of Class B1 office floorspace, in addition to retail, hotel, community and leisure employment generating uses.
- 7.35 The provision of a significant quantum of residential development therefore accords with planning policy at all levels including London Plan Policies 2.13 and 3.4 which seeks to optimise housing potential of new sites, in particular within OAs. The proposed maximum number of new homes on the site comfortably falls within the indicative range envisaged in the IPG.
- 7.36 The Revised Scheme will contribute significantly to the OA housing target London Plan (2016) Policy 2.13, and the LBTH housing targets in addition to providing a significant number of much needed new homes (including affordable housing) and a mix of employment generating uses.
- 7.37 This element of the Revised Scheme directly addresses and responds to Priority Points 3 and 4, set out in Section 3.0.

Residential Mix

- 7.38 London Plan Policy 3.8 encourages a full range of housing choice, which is supported by the Housing SPG which seeks to secure family accommodation.
- 7.39 LBTH MDD Policy DM3 and Strategic Housing Market Assessment (SHMA) (2012) target mix is set out below.

Tenure	1 Bed	2 Bed	3 Bed	4+ Bed
Market	50%	30%	20%	
Intermediate	25%	50%	25%	0
Social/Affordable Rented	30%	25%	30%	15%

- 7.40 The revised proposed residential mix for the Revised Scheme, based on the maximum parameters, across the entire site is set out below.

MAXIMUM (Parameter) SCHEME						
Unit Type	Studio	1 Bed	2 Bed	3 Bed	4 Bed	Total
Total	0	275	138	73	14	500
Hab Rooms	0	550	414	365	84	1413
Low Cost Rent	0	21	27	28	14	90
% (Unit)	0%	23%	30%	31%	16%	
Target %	0%	25%	30%	30%	15%	
Number hab rooms	0	42	81	140	84	347
Intermediate	0	12	39	44	0	95
% (Unit)	0%	13%	41%	46%		
Target %	0%	15%	40%	45%		
Number hab rooms	0	24	117	220	0	361
Private	0	242	72	1	0	315
% (Unit)	0%	77%	23%	0%		
Target %	0%	30%	50%	20%		
Number hab rooms	0	484	216	5		705

- 7.41 The revised proposed residential mix for the Revised Scheme, based on the minimum parameters, across the entire site is set out below.

MINIMUM (Parameter) SCHEME						
Unit Type	Studio	1 Bed	2 Bed	3 Bed	4 Bed	Total
Total	0	187	104	45	10	346
Hab Rooms	0	374	312	225	60	971
Low Cost Rent	0	18	16	19	10	63
% (Unit)	0%	29%	25%	30%	16%	
Target %	0%	30%	25%	30%	15%	
Number hab rooms	0	36	48	95	60	239
Intermediate	0	18	39	19	0	76
% (Unit)	0%	24%	51%	25%		
Target %	0%	25%	50%	25%		
Number hab rooms	0	36	117	95	0	248
Private	0	151	49	7	0	207
% (Unit)	0%	73%	24%	3%		
Target %	0%	50%	30%	20%		
Number hab rooms	0	302	147	35	0	484

- 7.42 The overall housing mix has been considered to accommodate the local needs identified by LBTH Core Strategy Policy SP02 and MDD policy DM3.

7.43 The precise mix of units within the Outline Component will be determined at Reserved Matters application stage and will conform with the mix ranges set out in the table in the revised Development Specification. The proposed mix provides sufficient flexibility to respond to changing market conditions over the period of construction of the site.

Affordable Housing

7.44 The London Plan Policy 3.12 identifies the need to “*encourage rather than restrain*” development and to “*promote mixed and balanced communities*” having regard to the need to the size and type of affordable housing needed and the specific circumstances of the site.

7.45 The GLA Housing SPG emphasises the importance of viability appraisals in assessing the ability of developments to deliver affordable housing including “*recognising that the requirements for contributions to schools, environmental improvements, transport or social infrastructure, may limit the number and mix of affordable homes*” (para 4.4.33).

7.46 Policy SP03 of the LBTH Core Strategy sets an overall strategic target for affordable homes of 50% until 2025. The policy recognises that this will be achieved by requiring 35% - 50% affordable homes on sites to be affordable (subject to viability).

7.47 LBTH Core Strategy (paragraph 4.4) which recognises that it may not always be possible to deliver affordable housing on site, and proposals must be justified by robust financial statements.

7.48 The Revised Scheme submission proposes 50% of on-site affordable housing based on habitable rooms which is in excess of the policy requirement. The proposed mix and tenure aligns with adopted policy.

7.49 The Mayor of London’s Homes for Londoners Affordable Housing and Viability SPG (2017) states that applications will not be required to provide viability information nor be subject to review mechanisms provided an agreed level of progress is made following the grant of planning permission, where they:

- deliver at least 35% affordable housing on-site without public subsidy;
- are consistent with the relevant tenure split (see section on tenure below) and meet other obligations and requirements to the satisfaction of the LPA and the Mayor where relevant; and
- have sought to increase the level of affordable housing beyond 35 per cent by accessing grant.

7.50 The SPG (and draft new London Plan) sets out the Mayor's preferred approach to implementing London Plan policies on affordable housing. The Mayor has adopted a “threshold approach” to viability, where the viability information expected to be produced by an applicant differs depending on the level of affordable housing being provided:

- Fast Track Route: applications that meet or exceed 35% affordable housing provision without public subsidy, provide affordable housing on-site, meet the Mayor's specified tenure mix and meet other planning requirements and obligations to the satisfaction of the local planning authority and the Mayor where relevant, are not required to provide viability information.

- Viability Tested Route: schemes which do not meet the 35% affordable housing threshold, or require public subsidy to do so, or which are otherwise not suitable for the Fast Track Route, will be required to submit detailed viability information.

7.51 To meet the requirement of the Fast Track approach, the Revised Scheme will deliver 50% affordable housing (by habitable room) on-site without public subsidy. The units, although in outline at this stage, will be provided in accordance with the preferred tenure split as set out in the Mayor's SPG (30% Low Cost Rent; 30% Intermediate and 40% to be determined by the LPA taking account of the relevant Local Plan Policy), as follows:

- 35% affordable housing, by habitable rooms, comprising 70% Low Cost Rent and 30% Intermediate in accordance with the Mayor's SPG and Tower Hamlets policy; plus
- 15% affordable housing to be delivered as intermediate housing.

7.52 The Fast Track Route therefore applies inter alia to applications that meet or exceed a 35% affordable housing provision without public subsidy. The exception is where land is in public ownership. The Mayor's policy states that this land should make a more significant contribution to affordable housing, and in particular that residential proposals on land in public ownership should deliver at least 50% affordable housing to benefit from the Fast Track Route.

7.53 The Stage III report identified that both LBH and LBTH believed that a greater level of affordable housing could be provided on the site. The report notes that an improved affordable housing offer was made when the Mayor took over the application. This comprised:

"Within Tower Hamlets, the provision of 25% affordable housing by habitable room comprising 48 intermediate and 93 social rent. Within Hackney, a payment in lieu of on-site affordable provision of £21.825m, which equates to 15% affordable housing by unit (87.32 dwellings comprising 35 intermediate and 52 social rent."

7.54 For the purposes of applying the Mayor's affordable housing policy and with reference to the Guidance Note published by the GLA in July 2018, *"control of the land is primarily in private hands."* As such, the Applicant is firmly of the view that the site should not be treated as public land. Notwithstanding, in respect of this Revised Scheme, the Applicants' position is that in proposing to deliver 50% affordable housing (by habitable room) on-site, the Revised Scheme provides significantly in excess of the London Plan policy requirements.

7.55 Furthermore, this approach meets the requirements through the Mayor's 'Fast Track' approach, as set out in the Mayor's 'SPG' which also states that *"Where 50 per cent affordable housing is delivered on public land, the tenure of additional affordable homes above the 35 per cent is flexible and should take in to account the need to maximise affordable housing provision"*. This represents a significant public benefit and provides a level of on-site affordable housing over and above that required by planning policy.

7.56 As such, the revised affordable housing offer therefore clearly addresses the comments identified in the Stage III Report and also responds to Priority Points 1 and 2.

Residential Density

- 7.57 The Stage III Report advised (paragraph 3) that the level of neighbourhood amenity impacts were as a result that the *“density, height, massing and layout of the scheme are not appropriate for this site as these factors result in the significant building mass along Sclater Street that drives the majority of the unacceptable impacts.”* In conclusion, the Stage III Report concluded that whilst the site has potential for high density development, *“in this instance the density proposed may partially be driving the unacceptable harm caused to neighboring amenity.”* (paragraph 258).
- 7.58 The site is located within an area of growth for residential use at regional and local levels, including both the OA and the LBTH and LBH Development Plans. These designations promote the site for delivery of housing within LBH and LBTH policies (LBTH Core Strategy Policy LAP1&2 and MDD Site Allocation 1 and LBH SALP Allocation 108), establishing the need for higher density development that optimise the development potential of the site.
- 7.59 The site has a PTAL score of 6b and as such has the highest possible access to public transport and is suitable for high density development. The London Plan provides an indicative density range of between 650-1,100 habitable rooms per hectare.
- 7.60 The Revised Scheme would generate a residential density of 1,379 habitable rooms per hectare or 495 dwellings per hectare across the site. This density calculation is based on the proposed maximum net residential area (GIA), as required by the London Plan and the Mayor’s Housing SPG.
- 7.61 The above density levels are seen to be appropriate given the location and strategic importance of the site at borough and regional level. Density cannot be considered as an issue in isolation and must be related to the overall quality of the development proposed, including townscape, local character and spaces between buildings, including streets and public/private amenity spaces as set out in the GLA Housing SPG and the London Plan.
- 7.62 The Revised Scheme has been reduced by circa 100,000 sqm of development area with a significant reduction in the number of residential dwellings. The LBH side of the development does not include any residential accommodation but will remain as a high-density commercial development which responds to the City Fringe context. The density of the eastern section of the site, located predominantly in LBTH, has a lower density reflecting the context of the surrounding area.
- 7.63 The evolution of the Revised Scheme has therefore addressed the concerns identified within the Stage III report by reducing the overall quantum of development on the site which reduces the associated impacts to amenity. As such, this responds to Priority Point 3.

Residential Standards

- 7.64 The Revised Scheme has been designed to deliver a high-quality residential environment. Notwithstanding the residential element of the Revised Scheme is within the ‘Outline Component’, a thorough analysis of the quality of the residential dwellings is included in the Design Guide and are discussed below.

Dwelling Sizes

- 7.65 Details of typical unit sizes for the Outline Component are included within the Design Guide.
- 7.66 The Design Guide provides a commitment for the Outline Component to follow the ‘Quality and Design Standards’ set out in Annex 1 of the Mayor’s Housing SPG.
- 7.67 As set out in the revised Design Guide, the Outline Component will comply with design standards set out in the Mayor’s Housing SPG, which will come forward at Reserved Matters stage.

Residential Amenity Space

- 7.68 LBTH Policy DM4 of the MDD and LBH Policy DM19 of the DMLP require new homes to meet the amenity space standards set out in the Mayor’s Housing SPG which requires 5m² per 1-2-person home and an extra 1m² per each additional occupant. As set out in the Design and Access Statement (DAS) and as suggested by the GLA in the Stage III report, all residential units in the Revised Scheme will have private amenity space. The provision of amenity space for the residential units will be provided as per the Design Guide.
- 7.69 Private amenity space for the residential units has been provided throughout the scheme with a combination of balconies, winter gardens, communal residential gardens and roof terrace spaces. The distribution and form of private amenity space is addressed in more detail within the DAS.
- 7.70 The DAS outlines the following quantum of private amenity space, totaling 8,844 m², would be provided at different levels within the scheme:

• Platform Level – Residential Garden	210 m ²
• Roofscape Level – Shared Residential Garden	1,116 m ²
• Roofscape Level – Commercial Garden	5,439 m ²
• Roofscape Level – Biodiverse Roof	2,079 m ²
• Total Private Space:	8,844 m²

Inclusive Design

- 7.71 A revised Access Statement is enclosed in the DAS and states that 90% of residential units will be designed to Approved Document Part M, M4(2) Category 2. Additionally, 10% of residential units will be spatially designed to Approved Document Part M, M4(3a) Category 3. Split-level and duplex apartments are not user-friendly for people with mobility difficulties, and therefore will not be designated for use as wheelchair adaptable units. The exact location of wheelchair adaptable units will be determined at the detailed stage. Designated wheelchair accessible residential units will be located so as to provide a variety of views and experiences.
- 7.72 All units will be accessed by means of corridors from the circulation cores. Balcony areas which are provided for use by residents, will be designed to be accessible with thresholds no greater than 15 mm, as recommended in Approved Document M and BS 8300. The proposals have been designed to

accordance with the requirements of the London Plan, the Housing SPG, LBTH Policies SP02 and DM4 and LBH CS Policy 19 and DMLP Policy DM19.

Business Use (Class B1)

Policy Review

- 7.73 London Plan Policy 2.13 notes that development proposals within opportunity areas and intensification areas should support the strategic policy direction, and where possible meet and/or exceed the indicative estimates set out within the London Plan.
- 7.74 London Plan Policy 4.2 seeks to support the management and mixed used development and redevelopment of office provision to improve London's competitiveness and to address the wider objectives of the London Plan.
- 7.75 Within the City Fringe Opportunity Area Planning Framework, the site falls within the 'Inner Core' area. Within this 'Inner Core', the OAPF anticipates there to be the 'highest' demand for employment to support the growth of the tech city aspirations and mixed-use schemes are expected to provide significant employment floorspace where proposals include the demolition of existing employment floorspace.
- 7.76 The OAPF also notes that any development proposals within the 'Inner Core' should provide the maximum viable amount of employment land and floorspace possible. The aim should be to achieve an employment-led scheme and one which results in an overall increase in employment floorspace compared to the existing amount. It goes on to note that strong consideration should also be given to developing employment-led schemes and the opportunity to provide an overall uplift in employment floorspace, through more intensive redevelopment of the site.
- 7.77 LBH Core Strategy Policy 3 identifies the City Fringe Opportunity Area as supporting London's financial, leisure and creative activities. It identifies South Shoreditch as providing approximately 168,000m² of new employment floorspace. The supporting text to this policy identifies that there is strong demand for micro and small employment space below 500m², in particular space below 100m².
- 7.78 LBH DMLP policy DM15 states that developments proposing new business (B1) floorspace are required to provide well designed, high quality buildings that incorporate a range of unit sizes and types that are flexible and that are suitable for subdivision and re configuration for new users and activities
- 7.79 The part of the site within LBH is identified as a Priority Employment Area ("PEA"). The Core Strategy identifies that the main purpose of PEAs is to protect and promote affordable business locations in the borough, especially in areas where clusters are well established. The proposed agglomerations will benefit businesses, provide employment opportunities, diversify Hackney's economy, while also assisting in the creation of an identity for an area assisting in the creation of a distinctive character for town and local centres.
- 7.80 The LBH Core Strategy outlines that it is anticipated that employment clusters identified within the plan are likely to deliver up to 407,000 m² of B class employment floorspace which is enough to meet identified demands for employment uses.

- 7.81 Policy DM17 of the LBH Proposed DMLP document advises that B1, B2 and B8 uses are appropriate uses within PEAs. However, Class A use, Class, C1, C3 and D1 uses are also considered acceptable within PEAs, subject to their compliance with Proposed DMLP policies DM7 (retail development), DM14 (retention of employment land), DM15 (new business floorspace) and DM16 (affordable workspace).
- 7.82 MDD Policy DM15 addresses the principle of local job creation and investment within the Borough. The policy is set out in full below for ease of reference:
1. The upgrading and redevelopment of employment sites outside of spatial policy areas will be supported. Development should not result in the loss of active and viable employment uses, unless it can be shown, through a marketing exercise, that the site has been actively marketed (for approximately 12 months) or that the site is unsuitable for continued employment use due to its location, viability, accessibility, size and condition.
 2. Development which is likely to adversely impact on or displace an existing business must find a suitable replacement accommodation within the borough unless it can be shown that the needs of the business are better met elsewhere.
 3. Development of new employment floor space will need to provide a range of flexible units including less than 250 square metres and less than 100 square metres to meet the needs of Small and Medium Enterprise (SMEs).
 4. Development of employment and residential use in the same self-contained unit (i.e. live-work and work-live) will not be supported.
- 7.83 The Revised Scheme is in accordance with Policy DM15 for the reasons set out below:
- The Revised Scheme seeks to significantly increase the employment offer onsite in respect of appearance, efficiency and current market needs. It seeks to provide a maximum of 130,940 m² (GIA) of Office (B1) accommodation across the site, therefore meeting the requirements of MDD Policy DM15.
 - The floorspace is flexible in nature and has been designed to provide the flexibility to offer a range of units under both the 250sqm and 100sqm policy thresholds. Importantly, the ability to divide floorspace into smaller units will ensure that the scheme is able to provide entry space for new business start-ups that may otherwise be priced-out of this part of Aldgate.
 - The office accommodation is a self-contained and does not include any live-work units.
- 7.84 The HCA Employment Densities Guide (2015) (“HCA Guide”) provides a robust and widely accepted measurement for assessing job density.
- 7.85 The Revised Scheme seeks to provide a range of employment opportunities and it can be estimated, that 379 FTE net construction jobs and 9,759 FTE net operational jobs will be created.

- 7.86 The Revised Scheme seeks planning permission for up to a maximum of 109,599 m² (GIA) of business use (Class B1) within LBH, as set out in the revised Development Specification. This represents a significant increase from the maximum quantum of Class B1 floorspace previously proposed.
- 7.87 The significant increase in the proposed quantum of Class B1 floorspace has been achieved by a reduction, but optimisation, of the quantum of residential accommodation on the site and its replacement with office (Class B1) floorspace.
- 7.88 The quantum and mix of uses across the site have been reviewed to significantly increase the commercial offer. The Revised Scheme provides a significant uplift in this type of floorspace from the existing situation and adds to the mix of uses for the regeneration of the site. As such, the Revised Scheme accords with the objectives of LBH Policy CS17 and DM17. The proposed quantum of employment floorspace also meets the objectives of the Mayor's City Fringe OAPF.

Type of Employment Space

- 7.89 The DAS provides an "illustrative scheme" (i.e. a scheme that falls within the ranges of the maximum and minimum parameters) that has been designed to allow maximum flexibility for a range of occupiers.
- 7.90 Within Plot 1, levels 00 to 05 is designated for SME space, designed to fit either side of the London Overground Line with varying depths of single aspect space, with direct street access at level 00.
- 7.91 The typical floor plate could be divided vertically or horizontally to allow the greatest flexibility on a floor-by-floor basis. The vertical split would create individual 'commercial town-houses' spread over all of the floors, each one benefiting from having their own front door.
- 7.92 The typical floor plate of the office building above 5th floor level has been designed to be as open and as flexible as possible. Generous floor to ceiling height allows natural daylight to penetrate the entirety of the floor plate. The split lift cores – one to the north of the station and one to the south enables subdivisions on the typical floors. The office floors can either be let as single large floor plates. Alternatively, the floors can be subdivided into small incubator units - following a similar format to the Tea Building - whereby a central corridor running centrally through the floor plates would serve a large number of smaller, single aspect office units.
- 7.93 Commercial use is seen to be appropriate within this location given the deeper plan of the buildings which results from the incorporating Shoreditch High Street Station (in Plot B) and addresses the vision in the IPG for providing employment space surrounding the station.
- 7.94 The provision of flexible SME space is wholly in accordance with LBH DMLP Policy DM15 which states that new business floorspace should provide well designed, high quality buildings and floorspace incorporating a range of unit sizes and types that are flexible, with good natural light, suitable for subdivision and configuration for new uses and activities, including for occupation by small or independent commercial enterprises.

- 7.95 Therefore, a range of workspaces to address changing economic need, including different types and sizes of accommodation to attract small and medium sized enterprises could be provided as identified by London Plan Policy 4.2 and LBTH MDD Policy DM15 and LBH DMLP DM15.

Affordable Workspace Provision

- 7.96 In line with LBH Policy DM16, in order to secure the employment provision to meet the identified needs of the local area, as part of the S106 Agreement(s) the Applicant will commit to leasing part of the B1 office accommodation as affordable workspace to an affordable workspace provider.
- 7.97 The Revised Scheme is office led and by its very nature proposes to deliver a significant quantum of office floorspace, which comprises flexible space for a range of potential occupiers. The provision of business and flexible workspace will contribute to the achievement of a mixed use development, the principle of which is set out in the London Plan and all LBH and LBTH planning policy documents. The provision of a proportion of floorspace for SME and start-up companies will be secured through the S106 Agreement(s).
- 7.98 Draft London Plan Policy E3 refers to ‘Affordable Workspace’ and sets out that *in defined circumstances, planning obligations may be used to secure affordable workspace at rents maintained below the market rate for that space for a specific social, cultural or economic development purpose. Such circumstances include workspace that is:*
- 1) for specific sectors that have social value such as charities or social enterprises*
 - 2) for specific sectors that have cultural value such as creative and artists’ studios workspace, rehearsal and performance space and designer-makerspaces*
 - 3) for disadvantaged groups starting up in any sector*
 - 4) supporting educational outcomes through connections to schools, colleges or higher education*
 - 5) supporting start-up and early stage businesses or regeneration.”*
- 7.99 Adopted LBH Policy DM16 states that the Council will seek 10% of the new floorspace within major commercial development schemes in the Borough, and within new major mixed-use schemes in the Borough’s designated employment areas, to be affordable workspace, subject to scheme viability. It goes on to note that the commercial terms relating to the affordable workspace are to be agreed between the applicant and the Council registered workspace provider and detailed within the associated legal agreement. Where this is not possible because the applicant wishes to either manage the space themselves or in association with a provider not registered with the Council, the Council will consider affordable workspace to be where rent and service charges, excluding business support services, are at least 20% less than comparable local market rates in perpetuity (although it is noted that, for some sectors and locations, much reduced rents may be needed to render them affordable to target occupiers such as locations in the Shoreditch PEA).
- 7.100 The LBH emerging Local Plan³³ notes that Development in the Shoreditch POA should provide at least 10% (offset by the amount of low-cost employment floorspace provided) of the new employment floorspace (gross) as affordable at no more than 40% of the locality’s market rent in perpetuity, subject to viability.
- 7.101 The emerging LBTH Local Plan states that within major commercial and mixed-use development schemes, at least 10% of new employment floorspace should be provided as affordable workspace.

Applicants should provide evidence of agreement to let the workspace at an affordable tenancy rate, at least 10% below the indicative market rate for the relevant location, for a period of not less than ten years.

- 7.102 In light of the above, the Applicant’s proposed approach to the provision of affordable workspace is to provide an adopted Borough policy compliant offer, based on the floorspace of the proposed Class B1 (and cultural / exhibition space) of the building(s) within the Boroughs, as follows:

Building 1	Approximately 2/3 of the floorspace provided is in LB Hackney and will provide affordable workspace in line with LB Hackney adopted policy. Remainder provided at LB Tower Hamlets adopted policy.
Building 2:	All of floorspace is in LB Hackney and will provide affordable workspace in line with LB Hackney adopted policy.
Building 3:	Approximately ½ of the floorspace provided is in LB Hackney and will provide affordable workspace in line with LB Hackney adopted policy. Remainder provided at LB Tower Hamlets adopted policy. The exhibition space will also be included as affordable workspace.
Building 5:	The workspace to be provided in line with LB Tower Hamlets adopted policy.
Building 6:	As set out under above under the emerging London plan policy, the proposed cultural space is proposed to be included as part of the overall affordable workspace offer in LB Tower Hamlets.

- 7.103 The Stage III report takes a ‘whole site’ approach to the assessment of the application, as it would seem irrational to consider the merits of that proportion on the Hackney side in isolation from that on the Tower Hamlets side. The report states that “The proposed development is not strictly employment-led, although overall the balance of employment and residential uses on the site is considered reasonable and acceptable in the whole-site context, as outlined above. Considering the PEA alone, however, it can also be said that the development proposals result in no loss of employment floorspace and a huge increase in employment floorspace compared to the existing level.”
- 7.104 The Stage III report also notes that “*Hackney considered that the proposed development could not considered to be employment led and that the application has failed to demonstrate that the maximum economically feasible amount of employment floorspace would be provided. It was also considered likely that amount of employment floorspace provided by the development would be at the lower end of the minimum and maximum range. Overall it was considered that the proposed development did not provide sufficient employment floorspace to meet demand and support the areas strategic business function. The residential led mix of uses was considered likely to undermine that business function and threaten the expansion of Tech City and continued business growth in the City Fringe. GLA officer views are provided below*”.
- 7.105 Finally, the Stage III Report states that “with regards to the provision of affordable workspace across the site, and in keeping with the GLAs ‘whole-site’ approach the applicant has agreed to the application of Hackney Council’s DMLP Policy DM16 ‘affordable workspace’ across the whole scheme. This means that 10% of the scheme’s office floorspace will be made available at a 20% discount from the local market rate.”

7.106 The Revised Scheme is employment led delivering up to 130,940 m² (GIA) of office floorspace across the site with 109,599 m² (GIA) within LBH. This means that the LBH PEA will comprise entirely employment floorspace in line with adopted and emerging policy. Further, the Revised Scheme will provide the adopted policy compliant level of affordable workspace as outline in the table above.

7.107 The Revised Scheme therefore further addresses the Stage III Report and Priority Points 3 and 4..

Retail Use (A1, A2, A3, A5 Uses)

7.108 The Revised Scheme comprises a mixed use development with a range of retail uses provided at ground and first floor level. In total the scheme comprises up to a maximum of 18,390 m² (GIA) for a range of retail uses.

7.109 The majority of the retail floorspace would be located within LBTH; whilst a smaller proportion of retail floorspace is proposed within LBH.

7.110 The proposed retail floorspace is intended to create a retail hub and sense of place that attracts a diverse mix of independent retailers and restaurateurs that will serve both local residents and office workers, as well as attracting London residents from a wider area.

7.111 The location of the site provides an opportunity to create a retail and leisure link route between the visitors shopping at Spitalfields to the south of the site, then northwards along Brick Lane, and westwards to the site. The proposals will create a retail hub which will complement the surrounding existing retail and leisure uses within the retail link route, as well as serving visitors to the north and west of the site as part of future development sites, for example at Shoreditch Village and The Stage, which will also become visitor attractors.

7.112 The site is located within the CAZ, an area which is considered to be a strategic location for retail and leisure development to support local residents, workers, domestic visitors and international tourists. The London Plan encourages the existing retail offer in the CAZ to be enhanced and for this area to be a main focus for retail development.

7.113 The emerging policy has identified a stronger and more proactive policy approach to the development of retail and leisure floorspace at the Goodsyrd. The Draft London Plan allocates Shoreditch as a new Retail Cluster - a new town centre classification as defined in Annex 1, and allocates The Goodsyrd as a key strategic mixed-use development site within the City Fringe. Both LBH and LBTH draft emerging Local Plans direct that the CAZ will be expected to support the delivery of new retail and leisure floorspace to meet identified need, whilst the Draft Future Shoreditch AAP encourages retail uses, and identifies indicative development capacity of 39,000 sqm of retail/community space within the Bishopsgate Goodsyrd 'priority development opportunity' .

7.114 Notwithstanding the fact that the site is allocated for retail and is located within the CAZ, the site is also located on the edge of Brick Lane centre, an area which is considered to be appropriate for retail uses, subject to demonstrating compliance with the sequential assessment and impact tests.

- 7.115 The proposed retail uses are critical to create a viable and vibrant place, and one that is able to support the living and working population created by the Revised Scheme and that of the existing community. The proposed retail provision will complement the surrounding retail vernacular by providing a mix of smaller scale units to accommodate retailers that are reflective of the local area.
- 7.116 The proposed retail, cafe and restaurant uses that are proposed within London Road and the open spaces will be provided at ground level to create active frontages, to animate public spaces. The precise mix of the “A class” uses will be subject to demand at the time of occupation to ensure that the development is viable and that an appropriate mix of activities is provided to support the population and visitors to the area.
- 7.117 The findings of the 2015 Retail Assessment concluded that there would be no significant adverse impacts arising on existing centres or future investment as a result of the development proposals. The Mayor did not raise the level and type of retail floorspace as a contentious issue. The levels of impact were not concluded to be significant.
- 7.118 The maximum level of comparison goods floorspace now being proposed has reduced from 20,100 sqm GEA (2015 Retail Assessment) to 19,260 sqm GEA. The original retail floorspace proposed was concluded to be acceptable in impact terms, and the same is concluded for the smaller, revised level of floorspace.
- 7.119 The proposed retail provision will be a crucial component of the Revised Scheme. In delivering a mixed use development in an accessible location that accommodates the needs of the new community and the existing. It will achieve the requirements of the London Plan (Policy 4.8) and LBTH MDD Policies DM1, DM2, SA1 and LBH Policies CS 17 and DM7 of the DMLP.
- 7.120 The impact of the proposed quantum of retail use is discussed and evaluated in more detail within the Retail Assessment which has been submitted in support of the Revised Scheme. The assessment concludes that the proposed retail and leisure floorspace proposals are considered to be entirely consistent with the retail objectives of the NPPF.

Hotel (C1)

- 7.121 London is one of the most visited cities in the world and is home to a wealth of world-class attractions and events. Within London, Tower Hamlets and Hackney are home to a number of these attractions and is recognised as offering a wide range of activities and attractions for leisure visitors. In addition to this, due to the proximity of the site to the City of London, wider CAZ and Canary Wharf, the site also provides an excellent location for accommodation to cater for business visitors.
- 7.122 The Revised Scheme includes the flexibility to provide up to a 150-bedroom hotel (maximum of 11,013 m² GIA) within Plot 8.
- 7.123 The London Plan Policy 4.5 notes that the Mayor will support London’s visitor economy and stimulate its growth, taking into account the needs of business as well as leisure visitors and seeking to improve the range and quality of provision. The policy also goes on to note that the Mayor will seek to achieve 40,000 net additional hotel bedrooms by 2036.

- 7.124 LBTH Core Strategy Spatial Policy 06 (4) seeks to concentrate hotels and serviced apartments in town centre locations to attract visitors and support tourism. The supporting text to the policy highlights that hotels and related tourism uses contribute a significant amount to the borough's economy, providing an opportunity to deliver a range of tourism-related services to reduce visitor accommodation pressures on central London and to help visitors to access tourist destinations within and outside of the Borough.
- 7.125 LBTH MDD Policy DM7 states that development of visitor accommodation will be supported in the locations identified in the Core Strategy and where:
- a) the size is proportionate to its location within the town centre hierarchy;
 - b) there is a need for such accommodation to serve visitors and the borough's economy;
 - c) it does not compromise the supply of land for new homes and the Council's ability to meet its housing targets;
 - d) it does not create an over-concentration of such accommodation or cause harm to residential amenity; and
 - e) there is adequate road access and servicing for coaches and other vehicles undertaking setting down and picking up movements.
- 7.126 LBH Policy DM17 of the Hackney Development Local Plan notes hotels as a preferred use in PEA's, provided that the commercial use is the primary use, in that the majority of floorspace should be for such use and that it is appropriate to the characteristics and functioning of the site and will not compromise the on-going operations of businesses in the PEA. The primary use of the Revised Scheme is commercial office (130,940 m² GIA) of which the hotel will be a suitable accompanying use (11,013 m²). The inclusion of a hotel in this location will aid in the mixed-use nature of the site but will not compromise the on-going operations of businesses in the PEA.
- 7.127 LBH Policy DM27 states that the Council will support proposals for hotels and identifies the City Fringe / Shoreditch area as being one of the key locations where hotel development is appropriate, provided that the following criteria are met:
1. Has a good level of access by public transport;
 2. Would not harm the balance and mix of uses in the area, and thus the character and function of the area, and would not result in the loss of general housing, and is fully compatible with surrounding land uses;
 3. Would not cause an unacceptable level of disturbance to, or loss of amenity to, occupiers of surrounding premises;
 4. Would not lead to an over-concentration of similar uses within the locality;
 5. Makes adequate provision for servicing, and pick up and set down points for taxis and coaches; and
 6. Complies with policy DM17 in relation to proposals in Priority Employment Areas; and
 7. Includes at least 10% wheelchair accessible bedrooms.

7.128 To address the above policy, the following points are evident:

1. The Revised Scheme has an excellent level of access by public transport – PTAL 6b (LBH Policy DM27).

2. The inclusion of a hotel would aid in the mixed-use nature of the site and would provide a suitable accompanying use to the office, residential and retail land uses, as well as the wider City Fringe area. Specifically, the proposed hotel would not result in the loss of general needs housing on the site and, as set out in the Residential Optimisation Study, would not prejudice the delivery of housing on this part of the site.
3. The surrounding uses are predominately commercial (office and retail) which would not be disturbed by the inclusion of a hotel.
4. Projections of demand and supply for hotel rooms have been calculated. These calculations are based on GLA data from 2017 and has taken into account forthcoming hotel developments. The conclusion is that the difference between supply and demand for hotel rooms up to 2041 is 1,504 rooms. This would further indicate there is a need for hotel accommodation, and the saturation point for the purposes of DM27 has not been met. In addition, there have been two recent planning decisions in LBTH and LBH for hotel development within the City Fringe:

73-77 Commercial Road (LBTH Application Ref. PA/18/03094)

LBTH resolved to grant planning permission in March 2019 for a 156 bedroom hotel at the above site. The committee report confirmed that:

- *“The City Fringe Opportunity Area and the City Fringe Opportunity Area Planning Framework (CFOAPF) (adopted in 2015) identifies the opportunity area as having capacity for 70000 new jobs and ,8700 new homes up to 2031. More specifically, London Plan Policy 4.5 supports the provision of leisure and business visitors in and around the CAZ and Opportunity Areas and recognised the need for apart-hotels.”*

In respect of the principle for hotel use, the GLA Stage 1 report sets out at paragraphs 14-16 that

- *“The site is located within the City Fringe Opportunity Area, as identified in the London Plan. London Plan Policy 2.13, and Table A1.1 states that the City Fringe Opportunity Area is capable of accommodating at least 8,700 homes and 70,000 jobs up to 2031. These figures are updated to a minimum of 15,500 new homes and a minimum of 50,500 new jobs to 2041 within the draft London Plan. London Plan Policy 4.5 supports provision for leisure and business visitors in and around the CAZ and in Opportunity Areas and recognises the need for apart-hotels. Draft London Plan Policy E10 promotes serviced accommodation in parts of inner London outside the CAZ within Opportunity Areas where they are well-connected by public transport, particularly to Central London.”*
- *“The provision of a hotel comprising 156 self-catering bedrooms in the accessible location of the City Fringe Opportunity Area is therefore supported and complies with London Plan Policy 4.5 and draft London Plan Policy E10.”*

49-51 Paul Street (LBH Application Ref. 2018/2104)

LBH granted planning permission for the redevelopment of the above site for a 145 bedroom hotel in March 2019. The LBH Planning sub-committee report dated 6th February 2019, set out the following:

- *“The site is located within the CAZ, CFOA and a PEA, and has excellent access to public transport. London Plan policies 2.10 and 2.11 and draft Policy SD4 support hotel provision within the CAZ. The CFOA asserts that there is capacity for 70,000 jobs in the opportunity area. There is a target set out in the London Plan for an additional 40000 net additional hotel rooms by 2036 increased in the draft London Plan to 58000 by 2041. The NPPF states that substantial weight must be given to the value of reusing brownfield land.”*
- *Policy DM17 of the Hackney Development Local Plan notes hotels as a preferred use in PEA’s, provided that the site has a PTAL of at least 5. Policy DM27 states that the Council will support proposals for hotels and identifies the City Fringe / Shoreditch area as being one of the key locations where hotel development is appropriate, provided that various criteria are met. The site is vacant and the proposed use is considered to be an appropriate and compatible use for the area, and is likely to benefit the area.*
- *In gathering evidence to inform future policies in LP33, projections of demand and supply for hotel rooms have been calculated. These calculations are based on GLA data from 2017 and has taken into account forthcoming hotel developments (a full breakdown of all major applications for hotel development in the borough is provided in the appendix). The conclusion is that the difference between supply and demand for hotel rooms up to 2041 is 1,504 rooms. This would further indicate there is a need for hotel accommodation, and the saturation point for the purposes of DM27 has not been met.*
- *The proposed development will provide a 145 room hotel and is identified as an acceptable use at this brownfield site with a PTAL of 6 given the applicable policy designations and would help to meet wider and local need for visitor accommodation. It is therefore considered to be in line with DM17, DM27 and wider regional and national policy.”*

In addition, the GLA Stage 1 report (ref. GLA/4461/01) dated 13th August 2018 sets out at paragraphs 14-15 that:

- *“London Plan Policies 2.10 and 2.11 and Policy SD4 of the draft London Plan support the provision of hotels in the Central Activities Zone, identifying visitor infrastructure as a strategic function of the CAZ. Additionally, London Plan Policy 4.5 sets a target of 40,000 net additional hotel rooms by 2036; this is increased to 58,000 by 2041 under Policy E10 in the draft London Plan. Locally, the site is within a Priority Employment Area (PEA) and Hackney Core Strategy Policy.”*
- *“The proposed development would result in the provision of a 10-storey hotel, which would contribute to the London Plan and draft London Plan target for additional hotel bedrooms of serviced accommodation. In addition, the proposal would deliver up to 72 jobs. The principle of development is therefore strongly supported in strategic planning terms given the delivery of new visitor infrastructure and associated jobs, and contribution towards the wider strategic functions of the CAZ and City Fringe Opportunity Area.”*

As such, in planning policy land use terms, there is support in principle at GLA, LBH and LBTH levels for new hotels within this area to meet the need for additional rooms to 2041. The principle for a hotel in this location therefore accords with LBTH Policy DM7 (b) and LBH Policy DM27.

5. The enclosed Transport Statement identifies that there is suitable provision for the hotel in respect of servicing.
6. As noted above, Policy DM17 of the Hackney Development Local Plan notes hotels as a preferred use in PEA's, provided that the site has a PTAL of at least 5. In respect of LBTH policy, as set out in the accompanying Residential Optimisation Study, the provision of a hotel on this part of the site will not prejudice the delivery of housing.
7. The hotel element is in outline and will be designed to meet the requirement of 10% wheelchair accessible bedrooms at Reserved Matters stage.

7.129 Therefore, in terms of the suitability of the site to accommodate a hotel development and contribute towards addressing need, the site is located within the City Fringe Opportunity Area and has an excellent transport accessibility (PTAL 6b). Adopted and emerging planning policy at all levels therefore supports the provision of a new hotel in this location, where there is an identified need and therefore makes the site suitable to contribute towards meeting an identified strategic and local need.

7.130 The introduction of a hotel land use on the site will contribute to the mix and variety of uses across the site as well as aid in the creation of jobs, provide a level of service to the local community as well as helping to meet a recognised need for additional visitor accommodation in this part of London. Therefore, the Revised Scheme fully accords with Development Plan policies LBTH SP06 and DM7, LBH Policy DM17, DM27 and London Plan Policy 4.5.

Non- Residential Institutions (D1), Assembly and Leisure (D2) and 'Sui Generis' Uses

7.131 LBH Policy DM5 identifies that proposals for new and extended social and community facilities will be supported. It goes on to note that Major developments should preferably be located in defined Growth Areas and Shopping Centres.

7.132 LBTH Policy DM8 states that health, leisure and social and community facilities will be protected where they meet an identified need and the buildings are considered suitable for their use. New facilities should be located in or at the edge of town centre.

7.133 The Revised Scheme provides up to a maximum of 6,363 m² (GIA) of non-residential institutional floorspace or D2 floorspace.

7.134 The Revised Scheme also includes the potential for the provision of on-site public conveniences. It is envisaged that further details of this facility and whether it includes changing facilities could be secured by a condition on any grant of planning permission.

7.135 Priority Point 7 refers to the aspiration for the provision of space for indoor sport and recreation. As a result of including the potential for up to 6,363 m² (GIA) of D2 use, the aspiration to meet this could be met within the Revised Scheme.

Public Realm and Landscaping

- 7.136 The Revised Scheme will create a rich mixture of public realm and landscapes over multiple levels of the site. This ranges from the busy city streets and an elevated park to private residential gardens and biodiverse roofs. The Revised Scheme has been designed to enhance the local area by opening up new connections, providing new facilities and developing an identity and character which celebrates the local history of the area.
- 7.137 The design is to create a rich multi-layered landscape from ground level to roofscape, from ‘city to wilderness’:
- A fast space at ground level;
 - A slow space on viaduct level;
 - A theatrical family of vertical circulation;
 - Amenity retreat on multiple levels;
 - Ecology retreats on high roofscape;
 - Create a new leisure destination capable of attracting to east London people from across the globe.
- 7.138 The diversity of the landscape and the quality of both public and private space seeks to create a sense of place with an identity, sympathetic to the character of this unique area of London.
- 7.139 The site is located within an area of London that has a significant deficiency of public open space, green space and playspace.
- 7.140 Overall, the Revised Scheme will provide a total of 25,812 m² (2.58 ha) of public realm comprising:
- 12,854 m² landscaped platform level public realm;
 - 12,958 m² landscaped ground floor public realm.

Public Realm

- 7.141 The proposed ground level public realm celebrates the unique culture of Shoreditch by referencing historic street pattern, architectural detailing the Shoreditch Terminus and the Bishopsgate Goods Yard. The public realm at this level is inspired by the textile tradition, through various references and narratives which weave around the main routes. The use of textures which represent the materials found in the local area also provide elements that relate to the history of the place.
- 7.142 The ground level public realm is an extension of the streets that surround the site. A combination of new streets and squares will create a series of new connections across the site, some of which have been lost for over a century.
- 7.143 The public realm is defined by a hierarchical network of Streets, Lanes, Gateways and Thresholds. The character and identity of each is formed by its relationship to the remaining historic structure, a reimagining of the lost history and carefully articulated new interventions. The Revised Scheme includes additional north/south and east/west routes to improve the permeability for pedestrians. These

routes are then activated through the introduction of retail, historic and landscaping features. The public realm at ground floor can be categorised into the following sub-areas:

Oriel Gateway & Webb Square

- Rhythm of demolished brick arches
- Footprint of forecourt to Shoreditch Terminus
- Green granite reference to planted Webb Square
- Goods Yard traffic island

Braithwaite Street

- Woven pattern derived from folded Braithwaite openings and oculi
- Brick former street linings
- Round brick arch & jack arch reflection

Bethnal Green Road and Sclater Street

- Yorkstone pavements and raised tables
- Granite setts in carriageway
- Rope sculpture and tree retained

Middle Road

- Turntables, facing different directions
- Truck hoist bay and distribution rails
- Granite setts and brick pavers

London Road

- Existing granite sett paving restored
- Existing rails, turntables and incidental features retained and restored

Farthing Lane & Cygnet Lane

- Braithwaite arch woven pattern
- Rails & oculi
- Paving reference copper plugs in tin farthings
- Canary yellow

King Square

- Rhythm of demolished brick arches
- Truck distribution rails
- Green granite reference to planted King Square

Brick Lane

- Granite and brick unfolded arch elevations

- 7.144 The vertical circulation will be a theatrical experience weaving between the layers of the star. Due to the site's multi-level experience, a series of stairways and adjacent lifts are strategically positioned around the site to provide a highly visible and legible structure of accessible circulation.

- 7.145 The staircases are conceived as a family, all different but of similar construction and character, derived from the industrial language of the site. They are designed to be both a pleasure to use and be robust in detail.
- 7.146 The two principal materials proposed are to be steel and concrete to provide a contemporary intervention that responds to the industrial character of the site. This material palette is proposed as a complementary contrast of colour and texture to retained historic structure.
- 7.147 The Platform Level provides the community with a tranquil haven from the busy streets and transport infrastructure of the city below. It sits over the retained historic structure and is elevated approximately 7 metres above street level.
- 7.148 There are four principal character areas that together make up public realm for The Platform. These are as follows:

The Balconies

- 7.149 The Balconies mark the western and eastern ends, announcing The Platform landscape to the wider context. The Oriel Balcony acts as a beacon on Shoreditch High Street and Commercial Street. The Brick Lane Balcony in much the same way announces the Platform to Brick Lane.

The Gardens

- 7.150 The Gardens are smaller scaled spaces between the Platform buildings, each with their own unique character and identity. They are designed with their microclimates in mind and act as garden rooms with a variety of functions and uses serving them.

The Field

- 7.151 The largest consolidated open space at the eastern end responds to the large open area of tracks on the historic Goods Yard platform known as The Field. This significantly scaled open green space provides the rejuvenated Platform with a flexible open lawn area and a wooded play garden.

The Banks

- 7.152 The Banks form a linear route from east to west connecting the Field, Gardens and Balconies together. This route is derived from the historic Goods Yard arrangement referencing the platform No 1 Bank, The Continental Fruit Bank, Grain Road and Field Road railway
- 7.153 It is clear that the Revised Scheme will provide a substantial quantum of varied public realm and landscaped space for the proposed residents, workers, visitors and the neighbouring community. The variations of public realm reflect the historic importance of the site and its transition through time. Variations in landscaping strategies enable the opportunity for retreat, natural play and adventure. The Revised Scheme will also encourage biodiversity and through the creation of different wildlife and habitats.

7.154 LBTH Policy DM10 advises that developments will need to provide or contribute to the delivery of an improved network of open spaces in accordance with the Council’s Green Grid Strategy and open space. The Revised Scheme includes the provision of 2.58 hectares of public realm. This will significantly improve the environmental quality for residents, visitors and employees of the scheme as well as the local community.

Child Play space

7.155 London Plan Policy 3.5 states that all new housing developments should make provision for public, communal and open spaces, taking particular account of the needs of children and older people. The adopted Supplementary Planning Guidance to the London Plan “Shaping Neighbourhoods: Play and Informal Recreation” (2012) recommends 10m² dedicated playspace per child for future provision. This is also set out in London Plan Policy 3.6.

7.156 The GLA population yield calculator has been updated as of 21st June 2019. Using this updated calculator, the child yield for the development, based on the maximum scenario, would be 198 children, resulting in a total maximum playspace requirement of 1,982m². The Revised Scheme provides a total of 3,970m² of child play space, which far exceeding the London Plan requirements. This is illustrated in further detail within chapter 4 of the DAS.

7.157 The 3,970m² of proposed child play space comprises of the following elements:

Proposed on site play provision

• Doorstep playable space	680 m ²
• Local playable space	2,800 m ²
• Youth space	490 m ²

Total play space provision	3,970 m²
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7.158 The majority of the provision will be located on the Platform Level public realm and within private shared residential gardens. However, other locations within the site provide the opportunity for playable space which will be integrated with public realm furniture and design.

7.159 ‘Playable landscape’ is the approach taken through the open space to provide challenging and interesting opportunity for all ages which will help engage and encourage social acidity.

7.160 It is envisaged that provision will also be provided within ‘Allen Gardens, Spitalfields City Farm and Weaver’ Fields’ for 12+ ages, which is located within 800m from the residential units to help supplement the play provision on the site. These will include a range of spaces offering a variety of play opportunities.

7.161 ‘Allen Gardens’ is approximately 1 ha in size and will play an important role in the overall provision of open space and play space for local residents. It is important to note that the site has capacity for the suggested provision in the SPG, this is suggested as a complementary to future amenity provision.

- 7.162 The area of playable space being provided within the Revised Scheme therefore exceeds the play space requirements calculated using the London Plan Supplementary Planning Guidance (2012).

Design

Site Layout

- 7.163 The need for high quality and sustainable design is engrained in policy at all levels, including the NPPF and London Plan and LBTH and LBH policy documents.
- 7.164 The revised Design and Access Statement and the revised Design Guide that accompany the Revised Scheme submission provides a full explanation and assessment of the design rationale and its evolution.
- 7.165 The pattern of routes and spaces is set out in the parameter plans and the Design Guide. The Parameter Plans set out dimensions for each route and establishes the hierarchy of routes across the site.
- 7.166 Braithwaite Street lies between Plots 1, 2, 3, 8 (to the west) and 4, 10A, 7B (to the east) and bisects the site in a north/south direction. New routes are created between the other Plots on site, such as Middle Road which runs in an east/west direction through the middle of the site, Farthing Lane which runs between Plots 4, 10A, & 7B (to the west) and 5, 10B & 7C (to the east); Cygnet Lane which runs between Plots 5, 7C (to the west) and 10C, 7D (to the east); London Road which runs along the southern boundary of Plots 7B,C&D and Brick Lane which runs along the far eastern edge of the site adjacent to Plots 6, 10C and 7D.
- 7.167 The provision of a second east-west link to better reveal the significance of the Grade II listed arches along the northern edge of the Braithwaite Viaduct is a key design move and therefore addresses Priority Point 13.
- 7.168 A new principal open space, comprising ‘Webb Square’ and ‘King Square’, is created at grade level, with access from Shoreditch High Street through the listed gateway, and from Commercial Street to the south and Brick Lane. Publicly accessible open space, named the Field, is created above grade level on top of the retained Braithwaite Viaduct. In addition, The Banks form a linear route from east to west connecting the Field, Gardens and Balconies together. This route is derived from the historic Goods Yard arrangement referencing the platform No 1 Bank, The Continental Fruit Bank, Grain Road and Field Road railway tracks which transported the incoming goods.
- 7.169 The layout of the Revised Scheme reflects the aspiration of the IPG with the tallest buildings located at the western section of the site, the refurbishment of listed arches for a mix of retail uses activating London Road, an elevated park, employment uses surrounding Shoreditch High Street station, retail activating the streets and public realm and residential elements across the site. The key components of the IPG are fully provided within the Revised Scheme.
- 7.170 The proposed layout provides significant permeability and legibility through the site, improving accessibility for pedestrians and cyclists from major access points such as Brick Lane. This enables and promotes connectivity with the surrounding area, which is further improved by the activity of ground floor uses as required within the IPG.

7.171 In terms of layout, the Revised Scheme still maintains the core design principles which are to:

- Provide new routes for pedestrians and cyclists through the site – The Revised Scheme improves the legibility and permeability of the site with its surroundings. Providing pedestrian routes which connect the main thoroughfares around the site (Shoreditch High Street and Brick Lane). The proposed design seeks to provide improved north to south and east to west footways located adjacent to the site and the provision of cycle routes within the site, particularly along Braithwaite Street which connects with the existing cycle network. New residential employee and visitor cycle parking will be provided as well as an increase provision of cycle hire facilities across the site.
- Connect new development into the surrounding area – The context of the area surrounding the site has been a key factor in the design evolution of the scheme. An example of this is the location of buildings, their size and massing and use.
- Provide a series of new public open spaces – A series of public spaces which differ in size and function have been provided within the Revised Scheme, these are located at varied levels and cater to all ages.
- Take advantage of and maximise sustainable transport opportunities ensuring maximum visibility and accessibility through new routes to Shoreditch High Street Station to maximise sustainable transport. This is taken further with the provision of bike hubs located within and near to the site, suitable cycle provision for residents, employees and visitors as well as minimal vehicular parking space, all within accordance with London Plan and Borough level requirements.
- Bring historic structures back into use – A number of historic features have impacted on and form much of the design of the development. An example of this is the retention of the original layout of London Road and the historic listed arches which are transformed into a unique retail promenade. Another example of this is the retention of the walled arches, oriel and gate which are grade II listed. These elements will be retained and refurbished marking the western entrance to the site. Smaller historic elements which formed part of the Bishopsgate Goodsyards will also be incorporated into the Revised Scheme scheme at a pedestrian level as a reminder for users of the site's former use and history. This will also be reflected in the architectural design and materiality.
- The proposed provision of meaningful and high quality publicly accessible open space, (in excess of 1.0 ha) therefore addresses Priority Point 5.

Quality of Design

7.172 The need for a high quality of design of the Revised Scheme is a key driver set out in the NPPF, London Plan and LBH and LBTH planning policy documents, as well as the IPG.

7.173 Section 12 of the NPPF advises that good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people.

7.174 A raft of policies at national level, within the London Plan and at the local level are relevant to determining the design of the proposal and its contribution to the surrounding townscape.

- 7.175 Paragraph 124 of the NPPF states that the Government attaches great importance to the design of the built environment and that good design is a key aspect of sustainable development; creates better places in which to live and work and helps make development acceptable to communities.
- 7.176 Paragraph 127 of the NPPF outlines that planning policies and decisions should aim to ensure that developments:
- a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
 - b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
 - c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
 - d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;
 - e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and
 - f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.
- 7.177 Good design is central to all objectives of the London Plan. Policies contained within Chapter 7 set out a series of overarching design principles for development to achieve by addressing its layout, height and massing and elevations.
- 7.178 London Plan Policy 7.1 requires good quality environments to be provided which have the best possible access to services, infrastructure and public transport.
- 7.179 Policy 7.6 states that ‘Architecture should make a positive contribution to a coherent public realm, streetscape and wider cityscape. It should incorporate the highest quality materials and design appropriate to its context.’
- 7.180 Policy 7.6 also requires new buildings and structures to be ‘of the highest architectural quality; they should be of a proportion, composition, scale and orientation that enhances, activates and appropriately defines the public realm’ and they should include details and materials that ‘complement, not necessarily replicate’ local architectural character.
- 7.181 London Plan Policy 7.4 states that ‘Buildings, streets and open spaces should provide a high-quality design response that:
- a) has regard to the pattern and grain of the existing spaces and streets in orientation, scale proportion and mass,
 - b) contributes to a positive relationship between the urban structure and natural landscape features,

- c) is human in scale, ensuring buildings create a positive relationship with street level activity and people feel comfortable with their surroundings,
- d) allows existing buildings and structures that make a positive contribution to the character of the place to influence the future character of the area, and
- e) is informed by the surrounding historic environment’.

7.182 For the purposes of the Outline Component, the Design and Access Statement provides an “illustrative scheme” that sits between the minimum and maximum parameters applied for. The Design Guide further amplifies the outline nature of these buildings and sets a series of guidelines to be applied in the detailed design of these buildings through the submission of subsequent Reserved Matters applications.

Illustrative Design (Plots 1, 3, 4, 5, 6, 7E, 8, 9 & 10)

Plot 1

- 7.183 As previously described, Plot 1 is located at the north west corner of the site, fronting onto the intersection between Shoreditch High Street and Bethnal Green Road. This part of the site is influenced by new and existing development such as the Tea Building, Shoreditch House and the proposed ‘Shoreditch Village’ development.
- 7.184 Shoreditch High Street Station is located within Plot 1. A two-metre zone around the station box, columns, entrance building, and London Overground viaduct has been assumed, to allow inspection and maintenance. An additional zone has been left either side of the station entrance to allow further expansion in capacity of the station with external escalators.
- 7.185 The Design and Access Statement contains an “illustrative scheme” that describes a form of development that could come forward. It should be noted that the “illustrative scheme” set out in the Design and Access Statement is based on a notional scheme between the minimum and maximum parameters for the Outline Component of the Revised Scheme and is purely for illustrative purposes only.
- 7.186 As described in the Design and Access Statement, the potential design for Plot 1 could take inspiration and architectural detailing from the local architectural vernacular. The architectural language seeks to fit with the spirit of the context and employ a limited, carefully considered material palette. The proposed materials reference the aesthetic of the converted warehouse building prevalent in the area to provide a refined industrial building image.
- 7.187 The illustrative scheme for Plot 1 shows how the ground floor is activated through predominantly retail units, with active retail frontages provided on all elevations.
- 7.188 The proposed massing has been carefully composed to allow the office building to appear as two separate buildings when viewed from Bethnal Green Road and Shoreditch Place; this has been done by introducing the vertical circulation on the exterior façade expressed as a “circulation break”. The split in buildings is further accentuated by the difference in height between the two plots, with the height of the western part being four storeys lower than the eastern part.

- 7.189 To articulate the mass, the upper floors of eastern block (above the transfer zone) have been pushed back from Bethnal Green Road. At the same time, the upper floors of the western block have been pushed back from the south. When combined, these alternating shifts in the massing ensure that the both blocks will be perceived as slender, independent buildings.
- 7.190 The typical floor plate of the office building above 5th floor level has been designed to be as open and as flexible as possible. Generous floor to ceiling height allows natural daylight to penetrate the entirety of the floor plate. The split core enables subdivisions on the typical floors. The office floors can either be let as single large floor plates, with the option for both western and eastern side to be joined together.

Plot 3

- 7.191 Plot 3 is situated on the South West corner of the site on Quaker Street. It is identified as a significant part of the overall site as it bounds the south-western edge of the development occupying a prominent corner of the masterplan. Following the principles established in the masterplan vision, it is proposed that the illustrative scheme on Plot 3 is a commercial-led, ground, plus 6 upper floors with retail uses on the ground floor. The building's look and feel will reflect the character of the Shoreditch context. It is intended that the illustrative scheme on Plot 3 reads as a threshold building into the masterplan. It will act as a massing transition between the development and its immediate surrounding context to the south of the site.
- 7.192 Plot 3 is constrained by four gantries which span across the site. The air-rights relating to these gantries means that a 2.5m offset is required around the existing structure. At the same time, on the south side of the site, 3m deep buttresses exist below ground level. New structure cannot penetrate below ground in this zone.
- 7.193 Together, these constraints define the location of the building's footing and the height at which the first-floor slab can sit. The small footprint of the site which sits on the ground fronts onto Quaker Street. This space offers the opportunity to create an active street frontage onto Quaker Street, with the reception of the office building and/or small-scale retail / workshop units offering the opportunity to animate the streetscape.
- 7.194 On the south side of the site, Plot 3 provides the opportunity to link with the landscaped areas of the masterplan. It is possible for the first-floor slab of Plot 3 to clear the gantries and associated air-rights offsets and sit at the same level as the Platform Level. This link would allow occupants of the building direct access to the amenities available in the platform level and a secondary access for visitors approaching the building from within other areas of the Goodsyrd
- 7.195 The height of the proposed building has been defined by a number of factors:
- It is felt that the building should form a strong bookend to the masterplan, allowing a transition between the taller buildings of Plots 1 and 2 and the existing context to the south.
 - The height is defined by consideration of the viewing corridor which runs directly through the site.
 - The height of Plot 3 should work as a positive addition to the existing streetscape. Its strategic position forms a natural end point to the streets which lead towards it (namely; Elder Street, Quaker Street, Wheller Street), with a gradual stepping in height along these streets coming to a point at Plot 3.

- 7.196 The base of the building is proposed to comprise of a monolithic brick band with carefully articulated openings forming the shop fronts to retail units and the office reception space. Moving to the upper floors, a lightweight ‘Crittall-box’ glazing system is adopted. This will maximise light penetration into the office spaces and set it apart from the main body of the facade. The Crittall style glazing will also help reinforce links to the warehouse aesthetic of the area. The transparency of the upper floors will create a layered effect to the facade, as the truss structure which runs through the interior of the building will be apparent from the street and give the building an added sense of depth.
- 7.197 The LB Hackney Pre-application sub-committee report dated 30th January 2019 advises that “*Officers currently have no adverse comments in relation to Plot 3.*”

Plot 4

- 7.198 Plot 4 will be a mixed use residential and retail plot situated on the northern edge of the masterplan. The plot has a close relationship with the London Overground viaduct to the south and existing boundary wall to the north. Plot 4 can accommodate up to 135 residential apartments, with retail space at ground level.
- 7.199 The massing of Plot 4 has an important role within the overall masterplan in mediating between the contrasting scales of the larger city context to the west, and the smaller scaled Brick Lane area to the east. Plot 4 fronts onto Bethnal Green Road and Sclater Street to the north which have an established historic street scale. The retained north boundary wall sets a precedent for the scale of the street edge. Retaining this will provide a physical reference to the previous use and fabric of the site whilst also providing a datum to the existing street edge, allowing a softer transition to the increase in scale beyond.
- 7.200 As part of the Residential Optimisation Study included as an appendix in the design and access statement, Plot 4 has been rigorously tested to ensure that it delivers the highest practical number of residential units without having an unacceptable impact on adjacent units. The optimised mass increased the overall heights to range between 6 and 19 storeys, re-ordering the massing to create a more visually broken, vertically emphasised approach to the street.
- 7.201 The illustrative architectural approach to Plot 4 has been inspired by the traditional furniture warehouse aesthetic of Shoreditch, as a modern interpretation of the historic context. The dominant material in Shoreditch is brick, but as the area has been redeveloped intermittently over the years, street elevations have become patchworks of different brick colours, tones and textures, giving Shoreditch its rich urban character. Streets are characterised by rows of vertically proportioned brick facades, that are different in style and decoration but complementary to one another.
- 7.202 Plot 4 is expressed as three distinct, vertical elements, all clad in brick, but each with a subtly different colour tone and texture. This not only references the historic streetscape of Shoreditch, but also brings definition to the mass and reduces its impact on the townscape, articulating a slenderer massing approach to the skyline.

Plot 5

- 7.203 The illustrative Revised Scheme of Plot 5 creates 79 apartments in three blocks between the Goodsyards boundary wall and the East London Line. Each block has been given a name to create an identity for the buildings within the wider masterplan and the existing streetscape. The names chosen have been inspired by places that supplied goods into Bishopsgate Goods Yard.
- 7.204 The plot layout is driven by the existing constraints as well as the masterplan needs. The new buildings' footprints are set behind the existing north boundary wall. A section of wall will be removed to accommodate the service yard entrance, serving the East part of the masterplan.

Waveney (West Block)

- 7.205 This building is inspired by the industrial context of Shoreditch, which shares a simple brickwork architecture derived from the architecture of furniture showroom-warehouses. The larger block is divided into two separate blocks of different heights, the lower being 9 storeys above ground and the taller at twelve storeys above ground. The building will be made from London Stock brick with reconstituted stone capping.

Stour (Middle Block)

- 7.206 This building is divided into two visually separate blocks of different heights. The lower block is six storeys above ground whilst the taller block is nine storeys above ground. The scale of the building is controlled by grouping the floors vertically into bays of 2 or 3 floors. This gives a more human scale to the block. Solder courses are introduced which span between brick piers to emphasise the divisions. The building will be made from grey/blue brick inspired by engineering blue brick of the Boundary wall with reconstituted stone capping.

Blyth (East Block)

- 7.207 The smallest of the blocks, this building is proposed to be clad in a green glazed brick. This building is located behind the Weavers Cottages, which means that it is particularly screened from the street appearing in oblique views down the street. The use of green brick will make the building stand out from its context. The architecture of the block is directly influenced by the architecture of its immediate neighbours. Brick detailing will include deep reveals and gauged brick arches, both of which can be found on the Weavers Cottages and Victoria building. However, the detail will be of modern interpretation with setback brick spandrel panels and opening sizes increasing with each floor. This helps to create a dialogue between the three buildings, based around a common language of details. The building is five storeys above ground floor.
- 7.208 To the north of the boundary wall the Weavers Cottages will be restored and extended into a co-working office space. The Victorian Building will be two apartments above ground floor retail units. The mission Hall will be used as a commercial unit, linked through the Boundary wall with a retail unit within the apartment building. The residential buildings will accommodate retail units and a doctors surgery.

Plot 6

- 7.209 Plot 6 is the most easterly plot within the Goodsyards masterplan. The plot is bound by the London Overground box to the south and Brick Lane to the east.
- 7.210 To the north, the plot abuts an existing terrace which wraps the corner from Sclater Street to Brick Lane and a vacant site which has previously had planning permission for residential use. To the south the plot forms one side of a new square off Brick Lane and respects the 2m offset from the London Overground viaduct. Plot 6 will be exclusively cultural use and is seen as the ‘beacon’ for the development acting as a cultural landmark for Shoreditch.
- 7.211 The plot is organised in 2 blocks, linked by a shared ground floor. The building footprint builds up to the boundary set by the 2m exclusion zone defined around the London Overground viaduct. The plot builds up to the application boundary to the north and east as well as forming the northern edge of the new public square off Brick Lane. Plot 6 therefore has frontage onto two key movement corridors and a new public square; Brick Lane to the east and the new proposed Middle Road to the south. This makes it prominently placed as an important cultural proposition within the masterplan.
- 7.212 The architectural approach to Plot 6 is driven by the ambition to create a new cultural, community landmark building within the masterplan. The dominant material in Shoreditch is brick, but as the area has been developed and redeveloped intermittently over the years, street elevations have become patchworks of different brick colours, tones and textures. These terraces are almost always grounded with commercial space, characterised by much larger openings at their base. The base principles of varied brick texture and commercial frontages at ground along with the ambition to create a cultural, community landmark building has informed the architecture of plot 6. Additionally, the building aspires to integrate the boundary wall into the building and the public realm by repurposing it as a permeable elevation

Plot 8

- 7.213 Plot 8 is located to the centre of The Goodsyards masterplan and is partially sited above the Grade II listed Braithwaite Viaduct. As part of the pre-submission discussions, Plot 8 was initially proposed as a 330-bed hotel across three buildings. However, following the Residential Optimisation Study, the revised brief was to provide up to 133 units in compliance with LBTH’s unit mix as part of a mixed use block. Block 8A will be the mixed use block as this is the only element that comes to ground; allowing for super structure to support a taller building, as well as providing entrance lobbies for both uses from the street.
- 7.214 The hotel element will be located across within Plot 8A and on levels 2, 3 and 4 on Plots 8B and 8C. The hotel is proposed to contain (subject to operator requirements) spa, gym and restaurant functions at level 04 for hotel users and the general public. The platform levels will contain public use, with A3 food and beverage proposed to level 1 of plots 8B and 8C and a fitness studio proposed to level 1 of Plot 8A. Plot 8A will accommodate residential units from Level 06.
- 7.215 The height, form and massing concept for the plot responds to the heights of the illustrative schemes to the west and the open park landscape to the east. The massing on the eastern blocks is controlled by the structural constraints as explained. The two blocks on the platform are envisaged as pavilion like

structures sitting within an expansive landscaped public realm. The massing of Plot 8a was always considered to be a taller module, mediating the height of the building structures on the platform level and the larger commercial buildings to the west.

- 7.216 The architectural approach to Plot 8 has been inspired by the sites historical industrial aesthetic. A repetitive, uniform pitched roof form sat centrally within the site creating a distinct historic character and streetscape. As well as the roof form, the warehouse aesthetic is defined by the characteristic horizontally proportioned windows. The form of which allows large amount of light to penetrate the building, historically providing better working conditions, but today providing opportunities for framed views and bright internal spaces.
- 7.217 Aesthetically, Plot 8 is expressed as two distinct entities, the residential block to the west (Plot 8A) and the hotel block to the east (Plots 8B and 8C). The blocks are unique in form and mass but respond and relate to each other through detailed elements to create a cohesive scheme. In both blocks, similar devices have been employed to reflect the Shoreditch vernacular by using horizontally proportioned windows, vertical piers and large openings at ground level.
- 5.8.88 The height, form and massing concept for the blocks respond to that of the illustrative schemes to the west and the open park landscape to the east. The Residential block sits between the office illustrative scheme (Plot 2) and the hotel block. The expressed frame of the block takes its proportions from Plot 2 and the facade detail relates to the fine detail of the hotel facade. The hotel relates to the green public space to the west and creates a more positive environment at a human scale. The block is dual aspect and responds to the contrasting context to the north and south. To the north a tight streetscape faces dense residential illustrative schemes. To the south, sections of the facade are opened up to create a more open face to the city and park, providing views out from the hotel and restaurant within.

Plot 8A

- 7.218 The elevations for Plot 8A are influenced by both the ‘warehouse’ aesthetic of the site and the proportions and rhythm of the illustrative schemes to the west. Expressed vertical brick piers are broken by horizontal masonry lintels which are positioned at every level to create an expressed frame with a ‘single-storey’ proportion. Within the frame sits a metal window system which includes feature fins to create an overall framework. Within the framework sits bronze panels to echo the fin and timber detail of the adjoining hotel. The block comes to both the ground and podium levels, responding to their different conditions. At ground it forms a dual entrance for residents and hotel guests providing separate lobbies and shuttle lifts. Large three and four storey readings express the transition between hotel and residential. An internal garden identifies a void and sky lift to the level 4 hotel lobby and is visible from Braithwaite Street.

Plot 8B and C

- 7.219 The elevation for the hotel is predominantly defined by the roof form of the building, which mirrors the historic typologies of the site to create a contemporary building form. The building is split into two similarly sized blocks to provide a break in the long northern and southern elevations. The two sections are connected via a glazed bridge link that provides routes between the hotel facilities on level 4. The facade is divided further into series of bays by vertical metal channels. This helps reduce the mass of the blocks and reflects the rhythm of the historic warehouses previously located on the site.

- 7.220 The façade to the north is a predominant feature of the retail street below and presents itself with a rhythm of vertical timber fins. The projection of the fins creates a subtle layering, which is animated during the day as the sun moves to cast shadows. At night, light penetrates through the timber screen creating a beacon within the landscape. The rhythm of the fins provides moments of privacy and activity, creating a dynamic and interesting face to the street at high level.
- 7.221 The facade is expressed as a base, middle and top, that each respond to the activities and layouts contained within. Where the building meets the ground, large glazed opening provide frontage for retail units and restaurants to create active street frontage to the public park. In contrasts to the base of the building, the middle of the facade is solid reflecting the private nature of the hotel rooms behind. Each bay contains two rooms at both first and second floor levels. Horizontal window openings maximise views out and let light in.
- 7.222 The top storey is defined by its double height pitched openings which help to give the building a lighter appearance. The openings are a response to the restaurant and spa activities contained within. On the southern elevation the double storey proportions of the top level provide dramatic views of London across the surrounding park. On the southern facade sections are set back to create outdoor terraced areas and to reduce the scale and massing of the building. All 3 sections of the facade are clad in timber and are held together in a series of vertical timber fins. As the fins rise they increase in density to provide variety and texture to the elevation. The uniform timber cladding adds a unique point of difference in a predominantly masonry development.

Plot 9

- 7.223 As previously set out, as a result of pre-submission discussions with the GLA, LBH and LBTH throughout the evolution of the Revised Scheme, a building previously forming Plot 9, located at podium level has been removed in order to provide additional public open space within the site. This was remade to meet a strategic requirement of LBTH to provide open space.

Plot 10

- 7.224 Plot 10 is located centrally within the masterplan to the northern edge of Middle Road; the main east-west route through the site. From the outset of the design process Plot 10 was proposed as low-rise flexible workspace provision focussed on the creative and digital industries. The block was to reflect the unique conditions of the site in the form of several long, low rise, thin blocks.
- 7.225 In late October 2018, following consultation with the Boroughs and the GLA, as part of a wider ambition to provide more homes within the masterplan, the design team was challenged to explore residential use on the plot.
- 7.226 The residential optimisation study explored increasing the massing to maximise residential accommodation. As such, Plot 10 comes forward as a sole residential use from levels 1 - 10 above a double height ground floor retail zone, providing up to 125 units in compliance with LBTH's unit mix as part of a site wide offer. The plot should provide retail space at its base, providing active frontages to masterplan streets and lanes.

- 7.227 The plot layout looks to maximise the available footprint, given its contextual constraints. The plot is organised in 3 separate blocks, each with its own access' and servicing strategy. The building footprint fills the plot, building up to the boundary set by the 2m exclusion zone defined around the London Overground viaduct as well as forming the northern edge of the east-west retail street and the frontages to Braithwaite Street, Farthing Lane and Cygnet Lane. The eastern most block also forms one side of a square off Brick Lane.
- 7.228 Plot 10 therefore has frontage onto five key movement corridors in and around the masterplan; Braithwaite Street to the west of Block A, Farthing Lane between blocks A and B, Cygnet Lane between blocks B and C and Brick Lane to the west. This makes it well very suited for use as retail accommodation at ground level.
- 7.229 The architectural approach to Plot 10 has been inspired by the Georgian terrace vernacular of Shoreditch and East London. The dominant material in Shoreditch is brick, but as the area has been developed and redeveloped intermittently over the years, street elevations have become patchworks of different brick colours, tones and textures. Streets are characterised by rows of vertically proportioned brick facades, that are different but complementary to one another. These terraces are almost always grounded with commercial space, characterised by much larger openings with broader solid areas for signage, at their base. This creates rich and varied street scapes which is one of the many aspects that makes Shoreditch such a vibrant and characterful area of London
- 7.230 The illustrative design of Plots 1, 3, 4, 5, 6, 8, 9, 10 and 11 are reviewed in more detail within Section 5 of the Design and Access Statement.

Detailed Design (Plots 2 and 7A, B, C, D)

Plot 2

- 7.231 Plot 2 has a prominent position within the masterplan, located at the western 'prow' of the site, in the centre of the 'Commercial Campus'. It is the tallest element in the masterplan, announcing the Goodsyards onto Shoreditch High Street and the City. As the first new build element to be submitted in detail the design for Plot 2 is setting a standard of outstanding architectural quality, a benchmark to be followed by the rest of the development.
- 7.232 The design pays respect to the Oriel Gateway, acknowledging it as a unique heritage asset. Together with Plot 1 it frames and highlights the importance of the gate as the main entry point into Middle Road, the masterplan's east-west route. Plot 2 interacts with the public realm at both street and Platform level, creating active and attractive spaces at both levels and forming physical and visual connections between the two.
- 7.233 The Revised Scheme on Plot 2 provides 64,029m² (GIA) of office space, distributed across a part 17 / 29 storey building floors. The building includes a basement, ground, mezzanine, 'platform level' and mezzanine and roof top plant. The brief is focused on achieving:
- High quality office workspaces
 - Variety of floorplate sizes

- Sustainability and flexibility for today's and future work practices
- An outstanding and competitive alternative to the City's commercial offer.

- 7.234 Retail units, total 2,350 m² (GIA) occupy a large proportion of the lower floors, with active frontages at street and upper levels.
- 7.235 Building 2 can be accessed from both ground floor and platform level. The Platform becomes the 'piano nobile' accessible from both street (ground floor) and the landscaped Platform levels. The building is raised above the landscaped platform. A glazed perimeter curtain wall system allows daylight to fill the main entrance foyer and retail at street level. The 15m wide 'prow' at the westernmost end of the building creates a sloped soffit or 'smile' at first floor level in response to the Oriel gate and the entrance to the Goodsynd.
- 7.236 The building's volume can be divided into three horizontal zones, each with its own distinct function and character, whilst creating a strong whole defined by a coherent architectural scale and language; the top, main body of the building, the intermediate transfer zone (level 01 to 03) and the base, interacting with the public realm and street and platform level.

Plot 7

- 7.237 Plot 7 comprises two parts. The largest part of Plot 7 is centrally located within the site masterplan. This part comprises Plots 7B, 7C and 7D, and includes: The Grade II listed Braithwaite Viaduct and adjoining unlisted arches, London Road, which sits east-west on the site between Brick Lane and straddles Braithwaite (formerly Wheler) Street. The smaller plot, comprising Plot 7A, sits at the western edge of the site fronting onto Shoreditch High Street. This collectively includes some of the site's key historic features; the Oriel, forecourt walls, two listed gates, gateposts and winding mechanism within the adjacent wall. All of the Oriel Gateway structures have Grade II listed status.
- 7.238 Both parts of Plots 7A, B, C, D are the subject of a Listed Building Application, with 1 containing the works to the Grade II Listed Oriel and adjoining historic structures, and a second application for works relating to the Braithwaite Viaduct.
- 7.239 The previous scheme concentrated retail in the Braithwaite Viaduct and its adjoining arches, with London Road acting as the site's primary shopping street. Whilst this made good re-use of the historic fabric along this route, it failed to celebrate the Listed Viaduct; the Listed arches were buried deep within the retail units and their elevations were not accessible for public viewing.
- 7.240 This application seeks flexibility of retail class use. However, the aspiration is for cafes and restaurants to be the primary occupiers on edges of new public squares, encouraging external spill out. This will provide a dynamic visual tug to visitors and animate these spaces.
- 7.241 It is proposed that the tenant mix is first and foremost for the local communities, then the Londoner, then the tourist. Retail diversity will be actively encouraged and promoted across the site. Shops that cater to the needs of the community might include butcher, baker, general store, grocer and delicatessen. It is envisioned that these could be supplemented by clothing and shoe retailers, bookshops, homeware shops, music stores, bicycle repair hubs and cafes. Overall, there will be an emphasis on independent

retailers, drawing inspiration from the vibrant Shoreditch shops and eateries found in the neighbourhood.

- 7.242 The detailed design of Plot 7 is reviewed in more detail within Section 6 of the Design and Access Statement.
- 7.243 The accompanying Design and Access Statement provides an analysis of the constraints and opportunities presented by the Revised Scheme. It sets out the design objectives, design principles and building evolution which have informed the Revised Scheme. It explains how the proposals contribute positively to the context of the site and surroundings and how the proposals contribute positively to the streetscape.
- 7.244 In summary, the design of the proposal is considered to offer a number of significant benefits by:
- Delivering an office led, mixed use scheme of the highest quality architectural standards, setting a benchmark for the local environs;
 - Enhancing the character of the area with modern development that is complimentary to its surroundings in the use of materials, whilst also responding to and enhancing heritage assets;
 - Consideration towards the draft Shoreditch Area Action Plan and the City Fringe OAPF which outlines the Boroughs and GLA's ambitions for the area;
 - Activating street frontages;
 - Creating exceptional external landscaped areas, improving permeability and connectivity and creating public, semi-public and private spaces;
 - Providing well designed, accessible scheme which promotes sustainable transport; and
 - Creating an iconic, unique development of exceptional quality architecture inside & outside.
- 7.245 It is considered that the proposal provides a scheme of the highest architectural quality, in terms of appearance, layout and massing and will contribute positively to the townscape of the surrounding area. The design of the buildings have been influenced through detailed consideration of the surrounding local context and through discussions with the Boroughs and the GLA. The Revised Scheme thereby accords with policies contained within the NPPF, London Plan Policies 7.2-7.6, LBTH Core Strategy Policies SO23, SP10 and SP12, MDD Policy DM24 and LBH Policy 24.

Tall Buildings

- 7.246 London Plan Policy 7.6 requires development to respond to the potential of sites and the local context, providing a development that enhances the public realm and complements the local architectural character, while mitigating any potential impacts on residential amenity, and the local environment and microclimate.
- 7.247 London Plan Policy 7.7 directs tall buildings to certain areas including town centres and opportunity areas with good public transport. These buildings should be of high-quality design and architecture and should respond to the local townscape character and interact with the public realm at ground floor level.
- 7.248 London Plan Policy 7.8 states that development should conserve the significance of heritage assets by being sympathetic to their form, scale, materials and architectural detail.

- 7.249 The City Fringe OAPF identifies the site as being within an area that may be suitable for tall buildings. The LBH Site Allocations document also allocates the site as having the potential for tall buildings subject to design and other considerations. The IPG provides further guidance for the siting of tall buildings on the site, with the key principle that the tallest buildings are located at the western end of the site with a reduction in scale and height towards the east. Figure 35 of the IPG is a diagram providing an “indicative transition in scale” and suggests a larger scale of buildings around and to the east and west of Shoreditch High Street Station.
- 7.250 In policy terms, therefore, the site has always been identified as a suitable location for tall buildings, being within the OA and designated within the tall building area in the LBH South Shoreditch SPD and within the IPG (paragraph 2.36 and figure 35) and is based on the surrounding context of the site and planning policy at local and regional levels. As such, the principle of tall buildings, with the tallest being sited at the western end of the site is appropriate.
- 7.251 The site constraints also play a major role in justifying the need for tall buildings on the site. The location of the Shoreditch High Street station and the London Overground Line are physical above ground constraints that restrict the type and form of development that can take place. To overcome these particular physical constraints, the Revised Scheme needs to include a significant amount of infrastructure to box over the rail line reaching a height of 8 storeys before a substantial floor plate can be constructed. Therefore, there is an unprecedented need for tall buildings on the site so that it is viable to construct the necessary quantum of infrastructure to reach a level that is viable.
- 7.252 The tall building elements reflect an exemplary standard of design which echoes the architectural vernacular of the surrounding urban form, in design and materiality. The materiality of the buildings are also reflective of their use in accordance within IPG Policy BG13 and BG14.
- 7.253 Plot 2 forms the tallest element within the site. Plot 2 extends to a height of 142.2 m AOD and comprises 17-29 storeys. The proposed building heights are listed below:

Maximum Plot Heights	Building	(m)	Storeys
Plot 1	Building 1	89.2	16/12
Plot 2	Building 2	142.4	29/17
Plot 3	Building 3	53.5	7
Plot 4	Building 4	81.5	19/13/11
Plot 5	Building 5	61.9	A) 13/10 B) 10/7 C) 6
Plot 6	Building 6	32.5	4
Plot 7	Retail Arches	N/A	N/A
Plot 8	Building 8A Building 8B Building 8C	105.8	A) 25 B) 4 C) 4
Plot 10	Building 10A Building 10B Building 10C	57.3	A) 10/6/9 B) 10/6/11 C) 7/3
Plot 11	The Pavilion Building		1

- 7.254 In line with LBTH Core Strategy Policy SP02 and MDD policies DM24 and DM26, the design strategy for the Revised Scheme reflects the transitional location of the site and responds to the CAZ and OA location. Although the site constraints dictate the location of tall buildings within the site, they fall within the proposed area for taller buildings, identified at a local and regional level.
- 7.255 The design of the Revised Scheme “respects and is informed by the existing scale, height, massing and fine urban grain of the surrounding built environment” in accordance with LBTH MDD Site Allocation 1 and the design principles within LBH Site Allocations Local Plan (2013).
- 7.256 The proposed massing and scale of the Revised Scheme is in accordance with LBH and LBTH design principles of the site ensuring that the scheme sits comfortably with the existing urban context, given the site constraints.
- 7.257 The tallest building (Plot 2) provides a focal point and distinctive landmark to assist in way finding and place making, for a site that is currently not defined. The materiality of this building will be brick steel and glass to represent its office use.
- 7.258 The Revised Scheme would assist in creating local distinctiveness and character in a manner that respects the existing local form and character of the diverse surrounding neighbourhoods. In conclusion, the Revised Scheme provides a high quality urban design approach which is appropriate in scale and massing, responding positively to the surrounding area and formed appropriately by planning policy and guidance.
- 7.259 The Revised Scheme meets the requirements and objectives of the IPG, NPPF paragraphs 58, 59, 60 and 61, London Plan policies 7.4, 7.6 and 7.7, LBTH CS Policy SP10 and MDD Policies DM23 and DM26, LBH Policy CS24, CS29, DM1 and DM2).
- 7.260 The Stage III report identified the following concerns in respect of design:
- *“locating tall and bulky buildings along the northern edge of the site in Plots C and D produces significant overshadowing of Bethnal Green Road and Sclater Street and creates challenges relating to impact on local amenity, particularly daylight and sunlight levels.”*
 - *“A small lane named Phoenix Place is provided between Commercial Road to Wheeler Street named Phoenix Place. This route is flanked by listed arches to the north and the proposed office block building to the south. The residential forecourt to the north of the arches will provide some activity on this route but officers are concerned that in spite of this, the 100-meter-long lane will lack sufficient active frontage to generate pedestrian activity or provide passive surveillance to ensure it feels safe and inviting. This route is also partly covered by a walkway providing access to the park, and accommodates servicing access to an adjacent building, further undermining its quality, and making it heavily reliant on policing and CCTV.”*
- 7.261 The Revised Scheme has made the following amendments to address the concerns identified with the Stage III report and Priority Points 5, 6, 8, 11 and 13 (noting that Priority Points 9 and 10 (in part) relating to the heights and form of the proposed towers on Plots F and G are no longer relevant):

- Reducing the overall density, height and massing of the development, particularly along Sclater Street. Building heights have reduced significantly along this frontage to align more closely with the surrounding context.
- The “*wall of development*” (referred to in the Stage III Report) along the north eastern part of the site has been removed and replaced with more appropriate residential mansion blocks.
- Medium to small buildings are proposed along the east of Braithwaite Street, which will improve impact on neighbouring amenity.
- Plots 4, 5 and 6 (previously Plots C, D and E) have all been reduced in height and will therefore reduce the overshadowing impact on Bethnal Green Road and Sclater Street.
- Plots 4 and 5 no longer bridge over the East London Line and therefore reduce the tight building configuration.
- Phoenix Street has been removed as a pedestrian route through the scheme.
- The primary routes remain and will provide active frontages required to ensure the public spaces are safe and inviting.

Townscape and Visual Impact Assessment

- 7.262 A Townscape and Visual Impact Assessment (‘TVIA’) has been prepared by Peter Stewart Consultancy and Miller Hare and can be found in Volume 2 of the ES. The TVIA provides a thorough study of the history and current townscape status of the context in which the Revised Scheme is located.
- 7.263 The TVIA assesses the likely significant effects of the development within Accurate Visual Representations (AVRs) from 64 distinct viewpoints. These viewpoints have been chosen and agreed with the Boroughs through a period of pre-consultation. The assessments have given rise to the conclusion that the Revised Scheme is of a high quality and is appropriate in terms of townscape and visual impact against the surrounding environs.
- 7.264 The TVIA notes that the medium to distant visual impact of the completed Revised Scheme are limited in nature and range from None – Negligible in their effect. This is a result of their limited magnitude of change particularly considered in the context of existing modern high rise development and consented development in the immediate and wider area which provides a context for the taller element of the Revised Scheme.
- 7.265 The high architectural quality of the proposals has been a consideration of the assessment. This is on the basis of the well-established principle that there is a material difference in impact between something that is well or poorly designed. In this case, the Revised Scheme has been designed to an exemplary standard and is an improvement on the existing situation.
- 7.266 The site blights the local area today and detracts from the townscape character of the surrounding area; and it has done so for at least 50 years.

- 7.267 Given the size of the site, it is inevitable and appropriate that the Proposed Amendments scheme will have a new townscape character of its own; one that continues the pattern of large-scale development and tall buildings seen to the south in the City. This is necessary in order to create a successful place, to make the most of the opportunities the site has to offer, and in order to meet the many clearly set out objectives for the site in the IPG.
- 7.268 The Revised Scheme will provide an outward looking form of city development that positively addresses the existing and proposed street frontages with active edges. It will become a new place with its own distinctive character; one that is well connected to its surroundings and will contribute to a wider network of streets with active frontages and uses. Considered both in the round, and in detail in relation to views and other receptors identified in this assessment, the effect of the Proposed Amendments scheme will be almost entirely beneficial or neutral, and the beneficial effects will be greatest and most noticeable in the immediate vicinity of the site. It will enhance the local townscape, integrating this large site, which presently makes no positive contribution to the townscape, as a valuable and positive element in terms of use, built form and design within the local area.
- 7.269 There is an adverse effect to view 49 along Elder Street (day and night) and on the townscape setting of the group of listed buildings in the same street. View 49 (and 49n), unlike other views nearby that align onto the towers on Plot 2, comprises a cohesive foreground of listed buildings of residential character, which may be contrasted with the more varied character, comprising commercial buildings and buildings of different ages, as seen in views such as 24, 28, and 46 or, in the case of the Boundary Estate (in view 32W) cohesive larger scale apartment blocks. In addition, views 28 and 48 are located within a townscape that has, by comparison, an open character which contrasts with the enclosed and directional character of the view along Elder Street.
- 7.270 The effect on the Elder Street Conservation Area, within which this street lies, is neutral, reflecting the varied nature of this area and its location in the City fringe. These three localised adverse effects (which are less than for the previously submitted scheme) are far outweighed by the substantial townscape and public benefits of the wider scheme.
- 7.271 The Proposed Amendments scheme will be a major contributor to the regeneration of the wider area, delivering significant social and economic benefits. It is in line with sections 12 and 16 of the NPPF and will contribute positively to making places better for people (in respect of architecture, urban design and townscape – para. 124); and contribute to local character and distinctiveness (para. 185). It is in line with the CABE / English Heritage ‘Guidance on tall buildings’, London Plan policies and guidance, and local policies and SPDs.
- 7.272 With specific regard to London Plan policy 7.7, the Revised Scheme positively responds to the relevant policy criteria that tall buildings should accord for the following reasons:
- The site is located within both the defined Central Activity Zone and the City Fringe Opportunity Area, and has excellent public transport accessibility, being located adjacent to Aldgate East tube station.
 - The area within which the site sits is already characterised by tall buildings. This is consistent with the City Fringe OAPF, which states that this area is identified as an area suitable for tall buildings,

and where a tall building cluster is emerging.

- The Revised Scheme sits at the gateway into the City, which is already partially defined by a cluster of taller landmark buildings. The scale and mass of the buildings have been designed to ensure that it complements the local skyline whilst not impacting on the strategic longer distance views of London's world heritage sites.
- The DAS and supporting Energy and Sustainability Strategy demonstrate that the highest standards of design, architecture and materials have been used to create a very high quality and recognisable development that addresses the unique character of the conservation area and complements the existing and emerging tall building clusters of the City Fringe OAPF.
- The Revised Scheme will make a very significant contribution to regeneration in terms of the economic stimulus through the creation of up to 9,759 FTE net operational jobs as well as up to 500 new home and the delivery of a landmark new commercial office building at a key gateway location. This will help to strengthen and drive the local economy and importantly provide job and business growth prospects for the local community.

7.273 Whilst not a LVMFG view, concern was raised by the GLA, Historic England, LBH and LBTH with regard to the view of the previously Revised Scheme from the south bastion of Tower Bridge and the visual impact on the Tower of London World Heritage Site. The Revised Scheme has been designed so that it is not visible in this view.

7.274 In conclusion, the Revised Scheme is seen to be beneficial in townscape terms and accords with policy at national, regional and local level and addresses the townscape comments from the Mayor in the Stage III Report, as follows:

7.275 The Stage III report confirms that the site is located within a number of strategy viewing locations, However, it states that *“from all of these viewpoints there would be a minor change to the view as a result of the proposal and the impacts would be neutral due to the distance of existing and consented development. The current design has been revised so as to minimise impact on LVMF 10.A.1, Tower of London from Tower Bridge north bastion. In the summer the amended proposals will not be visible, obscured by trees. In winter the revised scheme remains mostly obscured by dense branches and is barely noticeable, with a clear gap between the White Tower and the tops of Blocks G and F. This is a view of high sensitivity but the change to this view is considered to be a negligible.”* The report goes on to notes that *“The impact on the setting of the Tower of London is to be weighed against the benefits of the scheme in the final planning balance. The harm to the setting of World Heritage Site will therefore be considered alongside other impacts in the conclusion section of this report.”*

7.276 The Revised Scheme has reduced the height, scale and massing of the buildings on the site and as a result of this the Revised Scheme is no longer visible from the Tower of London (LVMF 10.A.1) view. Although it was identified within the Stage III report that this impact was negligible and any harm to be considered on balance, the reduction of the buildings has removed this infringement to remove any harm caused by the development which address the concerns raised in the Stage III report and Priority Points 9 and 11. In addition, this fully addresses the comment in Priority Point 10 with regard to the proposal should have a minimal effect on the World Heritage Site

Historic Environment

- 7.277 The Planning (Listed Buildings and Conservation Areas) Act 1990 (“the Act”) is the legislative basis for decision making when determining planning applications that relate to the historic environment. Section 66 of the Act imposes a duty on local planning authorities when considering applications which affect a listed building or its setting to have “special regard” to the desirability of preserving or enhancing the building or its setting or any features of special architectural or historic interest which it possesses.
- 7.278 Where a development would cause harm to a heritage asset, in order to comply with the duties in the 1990 Act the decision maker must apply considerable importance and weight to that harm (see the Court of Appeal’s decision in *Barnwell Manor Wind Energy Ltd v East Northants DC* [2014] EWCA 137).
- 7.279 The legal tests in the Act are supplemented by the policy guidance in Chapter 16 of the NPPF. In determining applications, the NPPF requires local planning authorities to take account of significance, viability, sustainability and local character and distinctiveness. Paragraph 192 of the NPPF identifies the following criteria in relation to this:
- *“the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*
 - *the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and*
 - *the desirability of new development making a positive contribution to local character and distinctiveness.”*
- 7.280 When considering the impact of a Revised Scheme on the significance of a designated heritage asset, paragraph 193 states that *“...great weight should be given to the asset’s conservation (the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.”*
- 7.281 Paragraph 194 of the NPPF states *“Any harm to or loss of the significance of a designated heritage asset (from its alteration or destruction or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of grade II listed buildings ... should be exceptional; and to grade II* listed buildings should be wholly exceptional.”*
- 7.282 Paragraph 195 of the NPPF states *“Where a Revised Scheme will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:*
- a) the nature of the heritage asset prevents all reasonable uses of the site; and*
 - b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and*
 - c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and*
 - d) the harm or loss is outweighed by the benefit of bringing the site back into use.”*

- 7.283 Paragraph 196 of the NPPF states *“Where a development proposal would lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including where appropriate, securing its optimum viable use”*.
- 7.284 In relation to the consideration of impacts on non-designated heritage assets, paragraph 197 states “The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset”.
- 7.285 Paragraph 200 of the NPPF states: *“Local planning authorities should look for opportunities for new development...within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.”*
- 7.286 In accordance with NPPF and development plan policy requirements, a comprehensive assessment of the significance of both designated and non-designated heritage assets within the vicinity of the Revised Scheme has been undertaken; and then subsequently an assessment of the impact of the Revised Scheme on the assets and their significance has been undertaken.
- 7.287 Set out below is a summary of the assessment of the Revised Scheme on the existing listed structures and surrounding conservation areas. The Heritage Statement prepared by KM Heritage sets out the full assessment in detail.

On-site Designated Heritage Assets

- 7.288 The on-site heritage assets include the Grade II listed Braithwaite Viaduct and the Grade II listed former forecourt walls and gates to the Goodsyards. Both the Oriel and the Braithwaite Viaduct are ‘Buildings at Risk’, as identified by Historic England, and are in a relatively poor state of repair. These structures will be repaired as part of the Revised Scheme and brought back into active use, as well many of their neighbouring unlisted structures. The heritage strategy for the site is positive and in line with good practice. It therefore is in accordance with relevant historic environment statute and policy.

Heritage Benefits

- 7.289 The Revised Scheme includes a clear opportunity to deliver significant enhancements and benefits for the on-site historic structures and the surrounding context. The proposed scheme offers genuine heritage benefits for the listed and unlisted structures on the site and enhancements to the surrounding historic context.
- 7.290 For the on-site heritage assets, the Revised Scheme provides significant benefits that will enhance the setting of these assets in the context of the site and its surroundings. These are summarised as follows:
- Repair, reuse and enhancement of the grade II listed Braithwaite Viaduct, a substantial and currently hidden building at risk, and full integration of the structure into the wider scheme;

- Repair, reuse and enhancement of the grade II listed Former Forecourt Walls and Gates (the Oriel Gateway), a building at risk which currently contributes very little to the surrounding townscape or the site, and full integration of the structure into the wider scheme;
- Both structures will for the first time in decades to be enhanced and to become publicly accessible and able to contribute to the site and the surrounding historic environment;
- Repair, enhancement and incorporation of the unlisted Sclater Street wall (northern boundary) into the wider scheme with some alteration to provide increased openings;
- Repair, enhancement, refurbishment and reuse of the unlisted Sclater Street weavers' cottages which are currently are in a very poor state of repair;
- Repair, enhancement, refurbishment and reuse of the unlisted Sclater Street Mission Hall and incorporation into the wider scheme;
- Alterations to the Brick Lane perimeter wall to improve access from Brick Lane into the site and increase public access to the Braithwaite Viaduct;
- Retention, repair, reuse and enhancement of the unlisted vaults to the south of the grade II listed Braithwaite Viaduct;
- Repair, refurbishment and enhancement of the jack-arches to London Road (with some minor demolition) and incorporation of London Road into the scheme as a principal, public east-west route;
- Retention, repair and enhancement of the former Goods Yard external wall north of the existing ramp and full incorporation into the wider scheme;
- Provision of enhanced linkages and connections between areas of related history and architectural interest as there once were;
- The general repair and refurbishment of the site will enhance the on-site heritage assets' significance and their contributions to the surrounding historic environment and nearby heritage assets; and,
- The proposed high-quality development will provide a significantly enhanced interface between the site and the surrounding historic environment, vastly improving on the current character and appearance of the site.

7.291 The Revised Scheme sets out to repair the above historic structures and buildings to provide them with sustainable new uses that can be seen and appreciated by the community. This will in turn add strength and enhance the character of the site and surrounding area to help reinforce the historic character and architectural interest of the site and its setting.

7.292 While the vast majority of the listed and unlisted structures on site are retained and given positive new uses, some demolition of historic fabric is necessary so that areas of the site can be developed. Demolition is focussed principally on the south-west corner of the site; an area currently occupied by unlisted barrel vaults and associated structures. That demolition of structures in this location may be necessary was foreseen in the Bishopsgate Goods Yard Interim Planning Guidance (IPG).

On-site Listed Structures

7.293 The on-site listed structures include the grade II listed Braithwaite Viaduct and the grade II listed 'Former Forecourt Walls and Gates to Bishopsgate Good Station'.

- 7.294 The Revised Scheme allows for the full retention of the Braithwaite Viaduct with some demolition of later accretions and structures at its western end and minor alterations/interventions along its length. The scheme also allows for the full retention of the Oriel Gateway structure although it does also involve the demolition of parts of its curtilage structures to the south. This includes a section of the boundary wall along Commercial Street and vaults V1 and V2 which sit behind the wall at a lower level.
- 7.295 Both the Oriel Gateway and the Braithwaite Viaduct are Buildings at Risk, as identified by Historic England, and are in a relatively poor state of repair with the potential to deteriorate further. The Oriel Gateway structure is in a particularly poor condition. It is in a far more exposed position than the Braithwaite Viaduct and demolition works in the early 2000s have left the structure very vulnerable to ongoing deterioration through water ingress and corrosion of the structure. The eastern face has been left exposed with its structure visible and it is overgrown with vegetation. The Oriel Gateway itself has been hoarded so as to protect against further deterioration, as have the original gates to the site which although repaired are vulnerable to theft and further damage.
- 7.296 In summary and overall for the heritage assets on the site, the Revised Scheme offers significant benefits. The Oriel structure and the Braithwaite Viaduct, both identified as Buildings at Risk, will be repaired and brought back into active use, as well as many of their neighbouring unlisted structures. The Revised Scheme therefore provides a significant heritage gain, by restoring these on-site heritage assets for active use.
- 7.297 For the above reasons, the positive and beneficial approach to designated heritage assets on site is compliant with national, regional and local policy.

Effects of the Revised Scheme on Site Context

- 7.298 It is recognised that there are five conservation areas and a significant number of listed and locally listed buildings within close proximity of the site. The Tower of London World Heritage Site is also located approximately 1.7km to the south of the site.
- 7.299 National and local planning policy is designed to conserve and enhance the setting of conservation areas and avoid any adverse effects on the significance of heritage assets. Policy BG10 of the IPG advises that the height and volume of any tall buildings should be designed to present a carefully modelled massing when viewed from the adjacent conservation areas.
- 7.300 In this regard, it is considered that the proposed scheme would meet and accord with the relevant historic environment policy consideration, as set out in the NPPF, the London Plan Policy 7.8, LBTH Core Strategy Policy SP10 and MDD Policy DM27; LBH Development Management Policies DM1, DM28 and Policy BG6 of the IPG.
- 7.301 The Stage III Report notes that Historic England and LBH raised concerns in respect of the demolition of the listed wall south of the Oriel gateway and whether the listing was appropriately assessed within the original application. The Revised Scheme seeks to retain this listed wall along the full length of Commercial Street with new interventions to provide entrances into the exhibition space and the Platform level of the scheme. Any changes to the wall will be included within the amended Listed Building Application.

- 7.302 Therefore, the Revised Scheme fully addressed the concerns outlined within the Stage III Report and Priority Points 12 and 15.

Transport

- 7.303 In accordance with planning policy a full assessment of the Revised Scheme in traffic and transport terms is contained within the Transport Assessment (TA) and summarised within the ES. The sections below summarise the findings of the Transport Assessment and any necessary mitigation measures.
- 7.304 The Site has a Public Transport Accessibility Level (PTAL) of 6b and is therefore identified as having ‘excellent’ access to public transport.

Car Parking

- 7.305 London Plan Policy 6.3 sets out that development proposals should ensure that impacts on transport capacity and the transport network, at both corridor and local level are fully assessed. It also notes that development should not adversely affect safety on the transport network.
- 7.306 Paragraph 6.15 of the London Plan reflects the policies set out within the NPPF to locate developments which generate significant amounts of movement in areas of high public transport accessibility, stating that:
- “... new developments that will give rise to significant numbers of new trips should be located either where there is already good public transport accessibility with capacity adequate to support the additional demand or where there is a realistic prospect of additional accessibility or capacity being provided in time to meet the new demand.”*
- 7.307 Policy 6.13 of the London Plan sets out the parking standards which states that proposals should propose no more parking than the maximum standards included in the Plan. This is to ensure of an appropriate balance between promoting new development and preventing excessive car parking provision that can undermine cycling, walking and public transport use. It also notes adequate parking spaces for disabled people must be provided preferably on-site.
- 7.308 LBH CS Policy 6 seeks to reduce the need to travel, particularly by car, and seeks to ensure that development results in the highest standard of environment and facilities for pedestrians and cyclists. Paragraph 4.47 of the supporting text to Policy 6 advises that reduced or preferably no on-site parking is required in areas with good accessibility to public transport and the cycling network.
- 7.309 LBH CS Policy 33 deals with promoting sustainable transport and states that significant trip generating development should be located within areas with a PTAL score of 5 or above. The policy also states that Travel Plans will be required for all developments over a certain size and that where appropriate car-free developments, car club bays and electric vehicle charging provision will be required.
- 7.310 LB Hackney Proposed DMLP Policy DM48 sets out their expectation for car free and capped developments, in most locations throughout the Borough but particularly in those that:

- Have a high PTAL rating (Level 4, 5 or 6);
- Are near a wide range of amenities including shops and leisure activities;
- Are within an operational Controlled Parking Zone or area of known parking stress;
- Where the presumption of off-street parking would be likely to cause conflict with pedestrians and other road users.

7.311 LBTH MDD Policy DM22 identifies where developments are located within areas of good public transport accessibility and/or areas of existing parking stress, the Council will require it to be permit free. The parking standards identify that 0.1 spaces are to be provided for units below 3 bedrooms and 0.2 for units above 3 bedrooms. The policy also identifies that an appropriate allocation of parking spaces should be provided for affordable family homes.

7.312 The Revised Scheme will be car free, with the exception of two Blue Badge spaces.

7.313 The proposals include two on-site disabled parking bays for the Detailed Application for Phase 2 and Phase 7, with one disabled bay for each of the proposed uses, office (Phase 2) and retail (Phase 7). The Applicant will work with the Boroughs and the GLA to develop an appropriate strategy for disabled parking provision for the wider site as the phased development progresses.

Delivery and Servicing Plan

7.314 All delivery and servicing activity will take place on site, within dedicated service yards and servicing areas, with all vehicles entering and exiting the site in forward gear. The site layout plan shows proposed design, as appropriate, for each of the dedicated servicing areas as they relate to plots / buildings associated with detailed and outline planning applications.

7.315 For delivery vehicles, it is considered that day-to-day activity will comprise of vehicles up to the size of a 10m rigid HGV. For refuse vehicles, notably vehicle specifications for LBH and LBTH vary slightly and this has been taken into consideration during the design process of the site layout.

7.316 The delivery and servicing strategy for the whole of the site can be summarised as follows:

- Bethnal Green Road service yard – will service Plot 1 only;
- Sclater Street service yard – will service Plots, 4, 5 and 10;
- Middle Road service area – will service Plots 7A, 7B, 7C, 7D and 7E;
- Braithwaite Street service yard – will service Plots 2 and 8;
- London Road service area – will service Plot 3 only.

Cycle Parking

7.317 The Revised Scheme will provide a maximum of 3,143 cycle parking spaces. This is broken down between 2,809 long-stay cycle spaces and 334 short stay cycle spaces.

7.318 It has been agreed through discussions with the GLA and TfL that the provision of short stay cycle spaces represents 70% of the draft policy requirement. It is important to note that this provision excludes the re-provision of the existing 40 station visitor cycle parking.

Cycle Hire

- 7.319 There are currently three TfL cycle hire docking stations next to the site: 37 docking points on Bethnal Green Road; 22 docking points on Brick Lane; and 16 docking points on Commercial Street. The Revised Scheme includes the provision of two additional docking stations: one on the east edge of Shoreditch High Street, south of the junction with Bethnal Green Road which would provide 15 docking points; and a second on the north edge of Commercial Street, west of the junction with Quaker Street, which would also provide 15 docking points.

Environmental Considerations

- 7.320 The Revised Scheme has been assessed in terms of its likely significant environmental impacts, in accordance with the Town and Country Planning (Environmental Impact Assessment) (England & Wales) Regulations 2017, as amended.
- 7.321 The assessment of the Revised Scheme is set out in the Environmental Statement Addendum (“ES”), which also includes an updated additional assessment (“the Limited Development Scenario”) whereby the entirety of the Plots 1,2 and 3 come forward independently of the rest of the site.
- 7.322 This section of the updated Planning Statement provides a summary of the findings from key assessments, including microclimate, flood risk, air quality, socio-economics, archaeology, noise, ground conditions, overshadowing, lighting and solar glare, and cross refers to the relevant sections of the ES Addendum which provide further detail.

Microclimate

- 7.323 Chapter 10 of the accompanying ES Addendum considers the effects of the Revised Scheme on the microclimate. The ES Addendum provides an assessment of the potential impact of the Revised Scheme on the local wind microclimate at the site and within the surrounding area. In particular it considers the potential impacts of wind upon pedestrian comfort and summarises the findings of the wind tunnel tests, which were carried out on the following scenarios:
- Configuration 1: Existing site with the existing surrounding buildings;
 - Configuration 2: Revised Scheme Buildings 2 and 7 with landscaping, wind mitigation and the existing surrounding buildings (mid construction scenario);
 - Configuration 3: Revised Scheme with landscaping, wind mitigation and the existing surrounding buildings (full development);
 - Configuration 4: Revised Scheme with landscaping, wind mitigation and the cumulative surrounding buildings (full development with cumulative);
- 7.324 The assessment concludes that wind conditions at the Revised Scheme would be improved over the 2015 Proposed Development with the embedded wind mitigation measures and proposed landscaping scheme. In both schemes there would be instances of strong winds with the potential to be a safety concern requiring the development of embedded wind mitigation measures and the proposed

landscaping schemes. In both schemes, with the application of these measures there would be no significant residual effects.

7.325 Please refer to Chapter 10 of the ES Addendum for the full assessment.

Water Resources, Flood Risk and Drainage

7.326 Chapter 14 of the accompanying ES Addendum considers the effects of the Revised Scheme on the water resources, flood risk and drainage.

7.327 A Flood Risk Assessment and a Drainage Strategy have been prepared, which provide detailed information on how foul and surface water will be managed to ensure that water quality, flood risk and sewerage infrastructure capacity are not compromised. The Flood Risk Assessment additionally includes details on how the scheme design has responded to flood risk and what further measures should be put in place with respect to managing flood risk on site.

7.328 The site is located within in Flood Zone 1, which is the zone of lowest fluvial and tidal flood risk. Furthermore, the site is allocated as a major development opportunity for mixed use development and so, for the purposes of the NPPF, passes the Sequential Test.

7.329 The ES Addendum concludes that Although areas of the site have been identified as being at risk of pluvial flooding, it is noted that this is mainly associated with the retained railway cutting along the southern boundary and sections of the highway at lower elevations to the surrounding land. The majority of the Revised Scheme will be suspended above the retained infrastructure and therefore will be located above existing ground levels.

7.330 Mitigation measures, such as water exclusion and water entry strategies, may be applicable to protect proposed basement and ground level development from pluvial flood depths in the western site areas. These can include:

- Boundary walls/fencing;
- Use of building materials with low permeability up to 0.3m; and
- Use of flood resilient materials and designs.
- Hard flooring and flood resilient metal staircases;
- Raised heating systems, electrical sockets and utility meters; and
- Sump and pump.

7.331 The regular maintenance of any existing and proposed drains and culverts surrounding, or on the site should be undertaken to reduce the flood risk caused by blockages.

Air Quality

7.332 Chapter 12 of the accompanying ES Addendum considers the effects of the Revised Scheme on the air quality.

7.333 The ES Addendum has assessed the impact on air quality that would occur as a result of the construction and operation of the Revised Scheme in terms of traffic generation and the on-site energy centre emissions.

- 7.334 The assessment concludes that based on the EPUK guidance, the change in annual mean NO₂, PM₁₀ and PM_{2.5} concentrations associated with the construction phase of the Revised Scheme results in the overall effect of the scheme on air quality being classified as negligible. Further, the change in annual mean NO₂, PM₁₀ and PM_{2.5} concentrations when the Revised Scheme is operational results in the overall effect of the Scheme on air quality being classified as negligible.
- 7.335 Therefore, the Revised Scheme meets the requirements for air quality neutrality in terms of building, and transport emissions.
- 7.336 This also addressed Priority Point 16.

Social Infrastructure

Employment

- 7.337 The Revised Scheme would provide a range of employment opportunities for local residents. The ES Addendum identifies that a total of 8,680 gross jobs are expected to be created by the Revised Scheme. It is estimated that the total net employment from the Revised Scheme would be 6,260.

Education

- 7.338 A high-level assessment of the likely requirement for school places generates the following numbers of places (the cumulative schemes and the Revised Scheme combined):
- 370 primary school places; and
 - 170 secondary school.
- 7.339 The development at 168-178 Shoreditch High Street (planning reference: 2015/3316) includes a 3FE primary school which will mitigate the effects of projected increase in population across LBH. Furthermore, the cumulative schemes will be expected to contribute through S106 / CIL contributions to further mitigate future pupil projection increases. The cumulative effect is minor adverse and not significant. School provision in the LBTH and LBH are likely to be sufficient to cater for these schemes.

Health

- 7.340 Once operational the 41 cumulative schemes in, including the Revised Scheme, will result in an additional 3,120 homes and, based on LBTH's average household size of 2.34 (average for the Revised Scheme in 2034) and the tenure mix of the Revised Scheme, a population of around 4,950. This is likely to generate demand for 3.3 full time GPs in the area (using the HUDU benchmark). The cumulative effect is minor adverse and not significant. It is likely that combined CIL payments can mitigate this effect but there is no certainty that CIL funds will be applied to any specific needs generated by these developments (and as such it has not been assumed to change the residual effect).

Archaeology

- 7.341 Chapter 15 of the accompanying ES Addendum considers the effects of the Revised Scheme on archaeology. The assessment concludes that a desk-based assessment carried out by MoLAS, along with the findings of previous MoLAS investigations on the site, were used to inform the baseline conditions. The assessment and that the site has a low potential to contain archaeological remains dated to the prehistoric, Roman or Saxon period.
- 7.342 However, the site has demonstrated a moderate potential to contain archaeological remains of the later medieval, post-medieval, post-medieval and industrial development of the area. The significance of any remains is considered to be medium.
- 7.343 The mitigation proposed for these impacts consists of targeted archaeological excavation in advance of preliminary ground works and the excavations for basements and foundations. This would allow remains to be recorded prior to their removal. This would be accompanied by an archaeological watching brief in areas not affected by deep ground intrusions. With the implementation of the proposed mitigation, the residual effects on buried heritage assets would be negligible. There is unlikely to be a significant cumulative impact of the Revised Scheme with other development schemes.
- 7.344 This approach is in accordance with London Plan Policy 7.8 which advises that development should identify and record archaeology. This also meets the objectives of LBH Core Strategy Policy 25 and LBTH Core Strategy SP10 and Policy DM27 of the Managing Development Document.

Daylight, Sunlight and Overshadowing

- 7.345 The Stage III Report set out in paragraph 539 the context within which daylight / sunlight and overshadowing matters should be considered, namely that *“Given the site is currently clear, and has been for quite some time, it is likely that neighbouring properties could expect a noticeable difference in daylight / sunlight and overshadowing in the event of any significant development.”* As such a *“pragmatic and flexible approach”* should be taken. The Stage III Report set out (paragraph 545) that the majority of the impacts are caused by the development proposed along the southern edge of Sclater Street, and to a lesser extent the proposed commercial building on Plot K.
- 7.346 Chapter 11 of the accompanying ES Addendum considers the effects of the Revised Scheme on daylight and sunlight. The ES Addendum includes an assessment of the potential significant impacts of the Revised Scheme in terms of the daylight and sunlight amenity to existing residential properties, overshadowing to existing amenity areas and light pollution.
- 7.347 The methodology for the assessment of daylight, sunlight and overshadowing is primarily set out in the 2011 BRE Guidelines which have been used to prepare the assessment in the ES addendum. For the purposes of the ES Addendum, the following scenarios have been considered., These comprise of:
- Baseline
 - Construction
 - Proposed Development
 - Cumulative

7.348 The ES addendum assess the impacts of the Revised Scheme in terms of the following:

- Vertical Sky Component (VSC);
- No Sky Line (NSL);
- Annual Probable Sunlight Hours (APSH)

7.349 Assessments have been undertaken to establish the likely significant effects of the Revised Scheme upon the amount of daylight, sunlight, overshadowing solar glare and light pollution received by properties, amenity areas and road and rail receptors neighbouring the site.

7.350 Daylight and sunlight effects on surrounding properties have been assessed based on the number of windows facing the Development. The effects to daylight, sunlight and overshadowing during construction are likely to steadily increase in magnitude as the Revised Scheme are built. As the construction works continue the levels of daylight, sunlight and overshadowing received by neighbours for the site would trend towards those of the complete and operational development.

7.351 Once the Revised Scheme is complete and operational, it is likely that there would be 26 instances where neighbouring properties would experience a Minor Adverse effect, 12 instances of Moderate Adverse effects and 12 instances of Major Adverse effects. The effect to the remaining 89 properties would be Negligible.

7.352 For sunlight, once the Revised Scheme is complete and operational, it is likely that there would be 13 instances where neighbouring properties would experience a Minor Adverse effect, four instances of Moderate Adverse effects and nine instances of Major Adverse effects. The effect to the remaining 109 properties would be Negligible.

7.353 In terms of overshadowing at nearby amenity areas once the Revised Scheme are complete and operational, it is likely that the effects would range from Negligible to Major Adverse.

7.354 For solar glare, all sensitive viewpoints would range in effect from Negligible to Minor Adverse. in terms of light pollution, all external receptors would see a Negligible effect, and one property internal to the site would experience a Moderate Adverse effect.

Energy and Sustainability

Energy & Sustainability Strategy

7.355 The planning application is accompanied by a Sustainability and Energy Strategy prepared by Hoare Lea.

7.356 The energy strategy follows the principles of the London Plan energy hierarchy: ‘Be Lean – Be Clean – Be Green’, which is set out in Policy 5.2 of the London Plan that seeks to minimise carbon emissions.

7.357 The sustainability strategy for the Revised Scheme seeks to create value through sustainable development, considering natural, physical, human, social and economic aspects. The energy strategy

for the Goodyard is a key part of the approach to sustainability. The ambition is to promote a simple approach to energy efficient and low carbon buildings, that exploits the benefits of current and future technologies, and delivers performance outcomes in practice, minimising carbon emission now and in the future, whilst also considering running costs to tenants and residents.

- 7.358 The energy strategy approach is based on good levels of insulation, efficient systems and controls, and the use of Air Source Heat Pump technology, on a plot-by-plot basis. The electricity-led strategy will result in not only a low carbon scenario at present, but continuous improvement as the grid decarbonises. This approach will also enable the scheme to be combustion free, facilitating a shift towards clean energy systems, with the associated benefits in local air quality and human health.
- 7.359 LBTH MDD Policy DM22 states that development proposals will have to meet or preferably exceed the minimum standards for cycle parking. Where possible development proposals should also provide land for and/or contributions towards new publicly accessible shared cycle hire schemes docking station. The policy identifies 1 parking space per 1-2 bedroom unit and 2 cycle spaces per 3 plus bedroom unit.
- 7.360 LBH Proposed DMLP policy DM47 states that development should provide generous levels of secure cycle parking as per the London Plan Standards and provide sufficient provision of changing and shower facilities for cyclist in employment sites. The policy also identifies that financial contributions should be made to publicly-accessible cycle parking located in the public realm within the vicinity of the site.
- 7.361 Policy DM29 of the LBTH Managing Development DPD (2013) states that development will be required to demonstrate its compliance to meet 50% carbon emissions reduction from 2013-2016 for residential and non-residential development. The policy also requires developments to connect or demonstrate a potential connection to decentralised energy systems unless demonstrated to be unfeasible or unviable. The LBH Development Management Local Plan, seeks a target carbon reduction of 40% from 2013 against 2010 Building Regulations.

'Be Lean' strategy

- 7.362 Passive Design measures are those which reduce the demand for energy within buildings, without consuming energy in the process. These are the most robust and effective measures for reducing CO₂ emissions as the performance of the solutions, such as wall insulation, is unlikely to deteriorate significantly with time, or be subject to change by future property owners. In this sense, it is possible to have confidence that the benefits these measures will continue at a similar level for the duration of their installation.
- 7.363 The Revised Scheme is anticipated to achieve up to a 5% reduction in CO₂ emissions beyond the 'Gas boiler baseline' prior to the consideration of any Low or Zero Carbon (LZC) technologies, i.e. via passive design and energy efficiency measures.

'Be Clean' strategy

- 7.364 This stage of the energy hierarchy includes consideration of connection to available district heat networks, or the use of on-site heat networks and decentralised energy production such as Combined

Heat and Power (CHP) in order to provide energy and reducing consumption from the national grid and gas networks, through the generation of electricity, heating and cooling on-site.

7.365 The feasibility of connecting to any existing district heating networks has been reviewed, but no opportunities have been identified in the vicinity of the site. Future-proofing measures will be implemented to enable connection to any future low carbon district heating network. On-site CHP is not proposed due to limited carbon reduction potential in light of recent grid decarbonisation (i.e. SAP10 carbon factors), and the adverse impact on air quality from flue emissions. Therefore, no additional carbon reductions are anticipated at the clean stage.

'Be Green' strategy

7.366 The final step of the energy hierarchy explores the feasibility of Low and Zero Carbon (LZC) technologies to allow for the production of renewable energy onsite in order to deliver further reduction in carbon emissions. A feasibility assessment of integrating low and zero carbon energy systems has been undertaken. It has been found that Air Source Heat Pumps (ASHP) and Photovoltaic panels (PVs) would be the most suitable options.

7.367 Heat pumps use electricity to move heat from one location to another, utilising the refrigeration cycle (in the same way that a domestic fridge moves heat from inside the fridge body to the external coils). Electricity drives the process, powering a compressor which circulates a refrigerant fluid through a circuit of pipes connecting two heat exchangers. As there is no fossil-fuel combustion involved in the process, local flue-gas emissions (and the associated detrimental impact on air quality) are avoided. Heat pump seasonal efficiencies are in the order of 300% (i.e. for every 1kW of electrical energy put into the heat pump, 3kW of useful heating is obtained).

7.368 A centralised system, via a traditional energy centre and on-site heat network approach, would likely to lead to increased carbon emissions due to additional distribution heat losses, temperature step-downs, and pumping power. Decentralised systems would likely lead to optimum system efficiencies per building, but would not facilitate connectivity between buildings.

7.369 Potential energy sharing opportunities within and between buildings have been investigated, using both the Part L methodology to determine potential simultaneous heating and cooling loads, and a bespoke thermal modelling analysis utilising more representative occupancy profiles and discreet HVAC system modelling.

7.370 The results indicate a potential heating and cooling load reduction of approximately 9-12%, simply by providing ASHP per plot, connected to all use types within that plot. This is a result of the use and load diversity within each plot. The results then indicate that extending the energy sharing approach to connect all plots on the site would lead to a heating and cooling load reduction of approximately 11–15%, i.e. a marginal benefit. This suggests that the load diversity of the whole site is only marginally higher than that of all the individual plots.

7.371 The proposed approach to ASHP implementation is therefore plot-by-plot. Energy sharing will be implemented within each plot, with the ASHP connected to all use types within that plot. Additional connectivity will be implemented on Plot 7 (the listed Arches) which will be connected to and served by ASHP from adjacent plots, due to the challenges of accommodating plant within the heritage context.

Further opportunities to share energy between plots will be enabled, via space provision for distribution pumps and heat exchangers, and safeguarding of distribution routes between plots. Connection of plots will be reviewed as future phases of the site come forward in detail via reserved matters applications. As plots come forward in detail, more refined energy analysis will be possible, enabling more granular assessment of the value of connecting plots together.

- 7.372 The plot-by-plot ASHP energy strategy is anticipated to result in carbon emission reductions of approximately 36% compared to a Part L 'gas boiler baseline'. Implementation of PV will be evaluated on a plot by plot basis, as plots come forward in detail via reserved matters applications. PV implementation will depend on available roof space once ASHP, other building services plant, and other roof uses such as occupant amenity spaces have been accommodated.

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**DRAFT S106
HEADS OF
TERMS**

8.0 DRAFT S106 HEADS OF TERMS

8.1 It is recognised that the Revised Scheme will generate S106 obligations and contributions. Set out below, on a without prejudice basis, is a draft set of heads of terms for any legal agreement attached to a planning permission issued by the Mayor acting as the local planning authority in this case.

- Affordable Housing
- On-site and Off-site Cycle Docking Stations
- Cycle Parking
- S278 Highway Reinstatement Works (for TfL, LBH and LBTH)
- TfL Roundel
- Second Entrance to Shoreditch High Street station
- Travel Plans (for LBH and LBTH)
- Travel Plan Monitoring
- Cycle Maintenance
- Electric Vehicle Charging Points
- Car Park Management Plan
- Interim temporary car parking
- Delivery and Servicing Management Plan
- Construction Logistics Plan
- On-site Pick-up/Drop-off
- Carbon Offset Contribution
- Provision of Pedestrian Routes
- Access to public open space / routes
- Estate Management
- Retail Strategy
- Management/Letting strategy for office floorspace
- Affordable Workspace
- Employment, Skills and Training Contribution
- Employment Strategy
- Local Labour (Construction)
- Local goods and services
- End User Labour
- Apprenticeships
- Public Art
- Phasing Plan
- Monitoring Fees.

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CONCLUSIONS

9.0 CONCLUSIONS

- 9.1 The Revised Scheme offers the opportunity to redevelop a site of strategic importance that has remained vacant for approximately 50 years. The site is one of the largest regeneration opportunities in central London and will bring the site back to life and provide significant regeneration to the surrounding area.
- 9.2 The site is subject to significant and unique physical above and below ground constraints which severely limits the potential of the delivery of a viable development on the site. This is just one of the many reasons why the site has remained vacant. The Revised Scheme provides an opportunity to address this and enable delivery of a sustainable and economically viable development to provide significant quantum of employment and business space, private and affordable housing, the creation of a new retail street and a new elevated public realm.
- 9.3 Following submission of the planning application in July 2014, in response to the consultation comments received from, inter alia, LBH, LBTH and the GLA, the application has been revised to evolve the design and address the comments raised, particularly in respect of the GLA Stage III Report.
- 9.4 In conclusion, the Revised Scheme:
- Provides high quality new buildings of outstanding design quality, which addresses the policy requirements of the Boroughs while responding positively to the onsite heritage assets.
 - Delivers a maximum of up to 500 homes of the highest quality.
 - Provides 50% on-site affordable housing, which is in excess of the policy requirement.
 - The delivery of a maximum of 130,940 m² (GIA) of business space. The space can accommodate a wide variety of occupiers, from local small-scale business start-ups to large multi-national corporations. Importantly an element of the commercial floorspace will be provided as ‘affordable workspace’ to provide access to local enterprises to occupy the new floorspace.
 - The creation of up to 150-bedroom hotel on the site.
 - The creation of 18,390 m² (GIA) of new retail floorspace, providing opportunities for local businesses to accommodate floorspace in a prime location.
 - The provision of a mix of retail uses which enables activity throughout the site connecting two existing retail nodes, Brick Lane and Shoreditch High Street. The retail strategy promotes small independent stores, which reflects the characteristics of the existing retail in the area.
 - The creation of 9,759 net FTE jobs across the predominately B1 office, hotel and retail uses which will generate £741 million GVA to the economy.
 - Creation of 379FTE jobs created during the construction phase, which will generate £24 million GVA per annum to the economy.

- Significant improvements to the public realm and setting for the area by providing generous, high quality publicly accessible spaces that are legible, permeable and accessible to all; and importantly improve safety and surveillance.
- The regeneration of a highly accessible brownfield site, identified at regional and local levels as a major development opportunity for a mixed use, high density development.
- Represents a sustainable and energy efficient design, with carbon savings, which maximize carbon reduction.

9.5 In addition to the significant regeneration benefits resulting from the Revised Scheme, there are many additional on-site heritage benefits gained, including the safe-guarding for future use structures that are on the Historic England ‘At Risk’ register, to ensure their preservation and maintenance for years to come including:

- Repair, reuse and enhancement of the grade II listed Braithwaite Viaduct, a substantial and currently hidden building at risk, and full integration of the structure into the wider scheme;
- Repair, reuse and enhancement of the grade II listed Former Forecourt Walls and Gates (the Oriel Gateway), a building at risk which currently contributes very little to the surrounding townscape or the site, and full integration of the structure into the wider scheme;
- Both structures will for the first time in decades to be enhanced and to become publicly accessible and able to contribute to the site and the surrounding historic environment;
- Repair, enhancement and incorporation of the unlisted Sclater Street wall (northern boundary) into the wider scheme with some alteration to provide increased openings;
- Repair, enhancement, refurbishment and reuse of the unlisted Sclater Street weavers’ cottages which are currently are in a very poor state of repair;
- Repair, enhancement, refurbishment and reuse of the unlisted Sclater Street Mission Hall and incorporation into the wider scheme;
- Alterations to the Brick Lane perimeter wall to improve access from Brick Lane into the site and increase public access to the Braithwaite Viaduct;
- Retention, repair, reuse and enhancement of the unlisted vaults to the south of the grade II listed Braithwaite Viaduct;
- Repair, refurbishment and enhancement of the jack-arches to London Road (with some minor demolition) and incorporation of London Road into the scheme as a principal, public east-west route;
- Retention, repair and enhancement of the former Goods Yard external wall north of the existing

ramp and full incorporation into the wider scheme;

- Provision of enhanced linkages and connections between areas of related history and architectural interest as there once were;
- The general repair and refurbishment of the site will enhance the on-site heritage assets' significance and their contributions to the surrounding historic environment and nearby heritage assets and;
- The proposed high-quality development will provide a significantly enhanced interface between the site and the surrounding historic environment, vastly improving on the current character and appearance of the site.

9.6 In summary, the Revised Scheme addresses the Stage III comments issued by the previous Mayor and is consistent with planning policy at the national, regional and local levels. The regeneration of the site, as set out within the Revised Scheme would contribute towards the delivery of a number of policy objectives at all levels which will benefit the site and the surrounding area.

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APPENDICES

APPENDICES

APPENDIX 1: SUMMARY OF GLA STAGE III REPORT (8TH APRIL 2016)

GLA Stage III Report Reference	Comment / Issue to be Addressed	Reference in Planning Statement
Para 3, 348, 518	<p><u>North-East Corner of the Site</u></p> <p>The density, height, massing and layout of the scheme are not appropriate as these factors result in significant building mass along Sclater Street that drives the majority of the unacceptable impacts.</p> <p>IPG seeks to avoid a “wall of development” and the impacts associated with this.</p> <p>Reference to medium scale buildings to east of Braithwaite Street to be delivered without harming neighbouring amenity. However, locating tall and bulky buildings along the northern edge of the site in Plots C and D produces significant overshadowing of Bethnal Green Road and Sclater Street and creates challenges relating to impact on local amenity, particularly daylight and sunlight levels, with significant impacts on a number of neighbouring properties.</p> <p>Tight building configuration is not a reason to justify the level of impact. This should be addressed through design, accepting the particular constraints of the site and its central location</p>	<p>Para 7.55 – 7.62</p> <p>Para 7.29 – 7.37</p> <p>Para 7.262 – 7.263</p>
	<p><u>Density</u></p> <p>The proposals would have a density significantly higher than the range indicated in the London Plan. The site has the potential for high density development but in this instance the density proposed may partially be driving the unacceptable harm caused to neighbouring amenity. The proposed density is likely higher than that which could be considered to optimise development and is therefore inconsistent with the development plan.</p> <p>The density, height, massing and layout are not appropriate as these factors result in the development along Sclater Street that drives the majority of the unacceptable impacts.</p>	<p>Para 7.55 – 7.62</p>
Paras 4, 352, 354, 363	<p><u>Phoenix Street</u></p> <p>There remains a design concern regarding Phoenix Street and</p>	

	<p>the potential for the space to become a magnet for anti-social behaviour.</p> <p>Phoenix Place will lack sufficient active frontage to generate pedestrian activity or provide passive surveillance.</p> <p>This could be achieved along Phoenix Place by creating shallow retail units within the arches and along Plot K, making it feel safer and more inviting. Moving the stairs further east, reducing the extent to which this route is covered, would also improve its quality and needs to be considered. A combination of these measures would ensure Phoenix Place becomes an important element of the schemes wider public realm network, providing good quality east-west permeability and would help justify the removal of the listed Oriel structure.</p>	Para 7.262 – 7.263
Paras 5,6,398	<p><u>Demolition of the Listed Wall</u></p> <p>Negative heritage impacts include substantial harm to the Oriel gateway (by demolition of the listed wall).</p> <p>The demolition of the wall to the south of the oriel and the substantial harm that would be caused by the demolition of the wall, has not been adequately justified and remains unacceptable.</p> <p>In addition, the demolition of a listed asset is not covered by the current listed building consent application.</p>	Para 7.303 – 7.304
	<p><u>Employment Provision</u></p> <p>The proposed development is not strictly employment-led, although overall the balance of employment and residential uses on the site is considered reasonable and acceptable in the whole-site context.</p>	Para 7.33 – 7.37 & 7.105 – 7.106
3, 8, 531, 532, 544, 545, Conclusions	<p><u>Daylight & Sunlight Impact</u></p> <p>To address daylight / sunlight concerns, a scheme would have to have significantly less height and massing along the north-eastern edge of the site in particular. This would in turn lessen many of the heritage impacts identified.</p> <p>The proposed development does not accord with the development plan in terms of neighbourhood amenity impacts,</p>	

	<p>specifically daylight/ sunlight.</p> <p>Best case scenario is that 219 properties would fail to meet the acceptable level (GVA).</p> <p>Reductions in height to Plot K have been discussed which would further reduce impacts, but have not been tested.</p> <p>Majority of impacts are caused by the development proposed along the southern edge of Sclater Street and to a lesser extent by Plot K</p> <p>To address the daylight / sunlight impacts, a scheme would have to have significantly less height and massing along the north-eastern edge of the site in particular. This would lessen the heritage impacts and the balance of harm to heritage assets and public benefit would likely to change in a positive way.</p>	<p>Para 7.263 & 7.347 – 7.356</p>
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APPENDIX 2: LEASING PROGNOSIS AND MARKETING STRATEGY



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LEASING PROGNOSIS AND MARKETING STRATEGY

This Leasing Prognosis and Marketing Strategy Report has been prepared on behalf of Bishopsgate Goodsyrd Regeneration Limited ("the Applicant") to accompany the Revised Scheme submission for the comprehensive redevelopment of Bishopsgate Goodsyrd ("The Goodsyrd"). This document has been prepared in relation to Plots 1, 2 and 3.

The Report comprises:

1. Introduction
2. Leasing Market Update
3. Leasing Strategy
4. Marketing Strategy

1 Introduction:

The Proposed Development includes Plots 1, 2 and 3 that are split between London Borough of Hackney ("LBH") and London Borough of Tower Hamlets ("LBTH") and will provide a total GIA offices of 1.3M sq ft.:

(1) Indicative areas, excluding retail at ground floor

Plot 1:	487,000 sq ft GIA
Plot 2:	677,000 sq ft GIA
Plot 3:	153,000 sq ft GIA

The objective is to secure a minimum pre-let of 150,000 sq ft for plot 2, (or 100,000 sq ft in the case of plot 1) which will be dependent upon planning consent having been granted and which will enable the Applicant to start construction of the buildings, developing the remaining space speculatively.

It is envisaged that the below podium floors of Plot 1 provide c. 100,000 sq ft that would be delivered speculatively, once a pre-let for the space above the podium had been secured. The floors in the below podium element are more likely to be of interest to tenants looking for smaller suites, and could be on more flexible terms. A specific marketing strategy for this should be developed in line with the evolution of Tech City at this time. This is likely to aim to achieve smaller lettings later in the process, towards completion and beyond.

In the case of Plot 3, it should be noted that historically tenants seeking a pre-let have targeted larger buildings. However, the critical mass of office space and occupier profile established by Plots 1 and 2,

coupled with delivery of the substantial public realm, including the raised park will establish The Goodsyrd as a destination and is likely to allow Plot 3 to either be delivered through a leasing during construction or post delivery.

The planning application provides the flexibility to provide retail use (Class A1, A2 and A3) at ground and first floor levels or, alternatively, Plots 1 and 3 could provide additional Business use (Class B1) by reducing the retail components. This will be reviewed in line with occupational demand and the animation of the ground floors to ensure place-making is retained once a pre-let is secured.

1.1 Timescale:

The proposed phasing for the Office Campus is as follows:

Plot 2	Phase 1
Plot 1	Phase 6
Plot 3	Phase 8

However, should a major pre-let be secured on Plot 1 and/or Plot 3, this could allow these elements of the masterplan to be delivered earlier.

The marketing strategy will need to coordinate with the phasing of development. With this in mind, we envisage that the first stage of marketing could commence once the revised scheme has been submitted. A full appreciation of the architectural material already commissioned needs to be undertaken to identify what else is required to be able to commence initial marketing of the development.

The full marketing material should be developed immediately following the grant of planning permission by the Mayor and this full collateral should include a marketing suite, film, brochure, models and press & social media. The critical element is the grant of planning permission and a pre-let is very unlikely to be secured before this milestone has been achieved.

2 CENTRAL LONDON LEASING MARKET UPDATE

For the second consecutive year the Central London occupational market defied expectations despite the ongoing political uncertainty. Take-up in Q4 reached nearly 3.4 million sq ft, bringing the annual total to 12.5 million sq ft, which was 6% ahead of the five-year average. The full-year take-up figure represents the highest level seen since 2010 and is around 7% higher than 2017, and 22% higher than 2016.

Large transactions remained a key driver of leasing activity in London during 2018, 40 deals over 50,000 sq ft were signed during the year, of which 16 were above 100,000 sq ft. This was an increase on the previous year and the 10-year average of 31 deals over 50,000 sq ft and 12 deals over 100,000 sq ft.

Total supply across the London office market ticked up during the final quarter of 2018 having fallen for five consecutive quarters. Availability now stands at 13.2 million sq ft, a rise of 6% on the previous quarter's level, but comfortably below the 10-year annual average of 14.3 million sq ft. Supply will likely remain stable into the next quarter, although by year-end we expect to see a significant rise as 22

Bishopsgate, one of the largest speculative developments, enters the figures. There is currently more than 700,000 sq ft of untenanted space in the scheme, although we expect a portion of this is likely to be committed in advance of practical completion.

The lack of options for occupiers seeking larger units remain, with just 15 buildings capable of accommodating a requirement in excess of 100,000 sq ft within the next six months, compared to 18 buildings at the same point in 2017.

2.1 Submarket Analysis: Shoreditch

The speed and scale of Shoreditch's evolution from a neglected former industrial fringe location to one of London's best-performing submarkets has been well documented. Shoreditch is closely associated with London's technology sector and start-up scene and came to the attention of London's commercial real estate sector around the time of the global financial crisis in 2008 when these new innovative companies began to cluster around the Old Street Roundabout.

The Shoreditch submarket sits in close proximity to the Broadgate Estate development by British Land, the estate connects the creative, tech-focused communities of Spitalfields, Shoreditch and Old Street with the City Core. The tenant mix at the estate is evolving due to recent development and repositioning – recent examples of tenants signing for space include Mimecast who acquired 79,000 sq ft at 1 Finsbury Avenue, McCann Worldgroup (148,000 sq ft) and TP ICAP (120,000 sq ft) at 135 Bishopsgate.

A total of 374,000 sq ft was let across 33 transactions during 2018, significantly down on the 761,000 sq ft leased during 2017 and 41% below the five-year average of 631,000 sq ft. A lack of large transactions contributed to the low levels of activity in 2018 with no deals over 50,000 sq ft signing during the year, compared to six deals in 2017 and three in 2016. The largest transaction during 2018 saw Spaces acquire 36,000 sq ft at The Painter Building, 70 White Lion Street. Of the space taken in 2018, newly built and refurbished space accounted for 57% (214,000 sq ft) and second-hand space was 43% (160,000 sq ft) indicating that there continues to be strong occupier demand for high quality space in Shoreditch.

Not surprisingly, media and technology companies are the dominant source of occupiers in the submarket. These two sectors have accounted for just under a half of leasing activity in terms of both volume and numbers over the last 10 years (2009-2018). Professional services (including legal) occupiers have also been active, acquiring 875,000 sq ft or 21% of space transacted over the period.

With the uncertainty surrounding Brexit, flexibility has become the main focus for companies looking to manage expansion, contraction or relocation. Occupiers want flexibility in terms of lease length such as the ability to have an earlier lease break. Beyond lease flexibility, occupiers want offices that allow them to adapt their space over time, as their business needs or workplace trends evolve.

Supply currently stands at approximately 608,000 sq ft, an increase on the same period last year (492,000 sq ft) and 54% above the five-year average of 396,000 sq ft. Whilst supply had increased at the end of December 2018, there were no units available which could satisfy a requirement more than

50,000 sq ft, compared to three schemes available during the same period in 2017.

The development pipeline in Shoreditch looks particularly tight in 2019. There is only one scheme due for delivery this year that could satisfy a requirement greater than 100,000 sq ft – Schroders's refurbishment of Wenlock Works on Shepherdess Walk. Looking beyond 2019, supply looks set to tighten. There is 367,000 sq ft under construction that is not yet committed and due to complete from 2020; given annual average take-up of new and refurbished space in this market is 478,000 sq ft the pipeline is unlikely to keep pace with demand.

2.2 Pre-Letting Market:

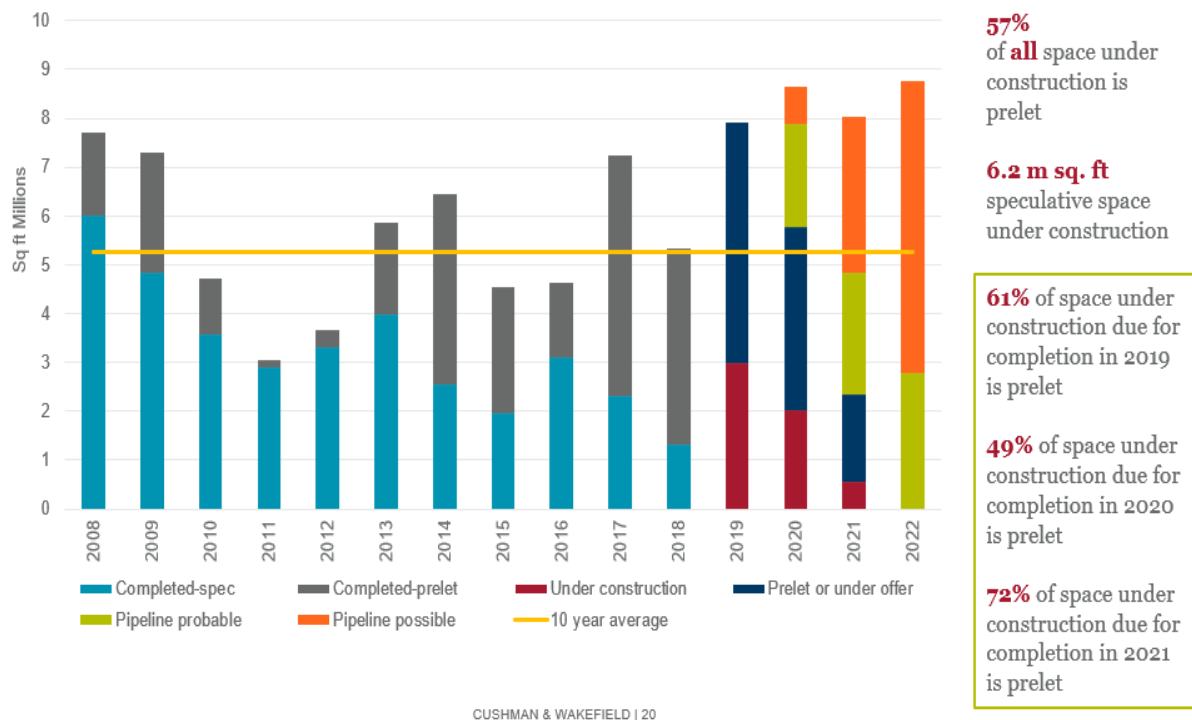
Since the EU referendum, many businesses have focused on securing the best solution to their long-term real estate needs beyond Brexit. This has led to a growing appetite for pre-letting, across a widening spectrum of business sectors, geographies and size bands. The trend is particularly pronounced in Central London where the near-term pipeline of space speculatively under construction is quickly being eroded.

A combination of limited supply, and a lack of available debt for speculative development is resulting in Central London occupiers launching searches far in advance of their planned relocations. The amount lent by banks to property developers has fallen 56% over the last five years, from £34 billion outstanding in December 2013 to just £14.8 billion in December 2017, according to the Bank of England. This has resulted in a surge in pre-letting activity across London over the past five years. With available supply expected to remain constrained, the trend towards pre-letting is expected to continue in 2019 and beyond, as occupiers face an increasingly limited choice of space.

Pre-letting continued to drive leasing volumes across London during the final quarter of 2018, accounting for 27% or 906,000 sq ft of transaction volumes. This brought annual pre-let leasing volumes to 3.4 million sq ft (27% of total leasing volumes), compared to 2.9 million sq ft (25% of leasing volumes) during 2017 and above the 10-year average of 2.4 million sq ft (22% of volumes).

London's position as a global centre for creative industries is reflected in tenant demand for new, quality space; media & tech occupiers have accounted for 32% of total space pre-let in the last 10 years. Large transactions from several 'unicorn' companies have buoyed pre-let volumes in recent years including Apple's acquisition at Battersea Power Station (475,000 sq ft), Dentsu Aegis Network's 312,000 sq ft deal at 1 Triton Square, Amazon's 607,000 sq ft transaction at Principal Place and Facebook's recent commitment at King's Cross (600,000 sq ft).

CENTRAL LONDON DEVELOPMENT PIPELINE – Q4 2018



Across central London there is 14.5 million sq ft of office space under construction, 57% is pre-let or under offer leaving just 6.2 million sq ft available. Completion levels peaked in 2017 at 7.2 million sq ft, up from the five-year average of 5.6 million sq ft. We will see a higher level of completions during 2019 at 7.9 million sq ft, albeit at the end of December 61% of this was pre-committed, leaving just 3.0 million sq ft available. Given that average annual newly built/refurbished take-up across Central London is 6.9 million sq ft, the choice for occupiers will remain limited in the short term.

We are starting to see signs of a subdued pipeline going forward with only 6.7 million sq ft under construction post 2019, of which 51% is already pre-let or under offer. There is a further 7.5 million sq ft of space which could come forward before the end of 2021, albeit at the end of 2018 just 5.3 million sq ft of this space had a planning application submitted or approved.

What is significant about this graph is:

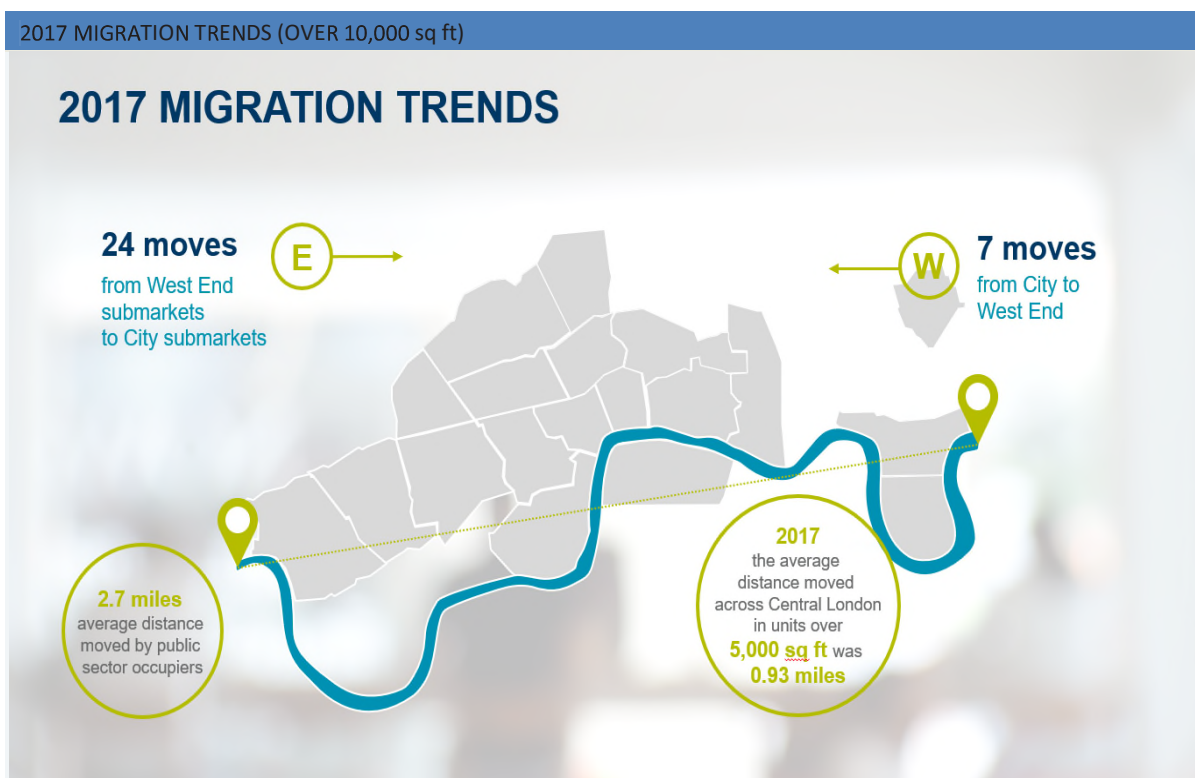
- The limited number of buildings available or under construction providing over 200,000 sq ft
- The volume of accommodation that is pre-let or under offer in 2019-2021
- The limited amount of space under construction due to be delivered from 2021 onwards

Looking forward the following schemes either have planning consent or have the potential to be delivered and could compete with The Goodsyrd:

MAJOR COMPETING SCHEMES (OVER 150,000 SQ FT)			
SCHEME	SIZE (SQ FT)	DEVELOPER	COMMENT
40 Leadenhall Street, EC3	878,000	T H Real Estate	Currently demolishing / soft strip of existing building.
Elizabeth House, SE1	740,000	H B Reavis	Vacant possession 2019 / 2020. Revised planning application to be submitted imminently.
8-10 Bishopsgate, EC3	572,000	MEL	Ground works underway.
2-3 Finsbury Avenue, EC2	563,000	British Land	Vacant possession 2019. New development proposed.
1-2 Broadgate, EC2	483,000	British Land	Vacant possession 2019. New development proposed.
1 Brannan Street, E14 (Wood Wharf)	359,000	Canary Wharf Limited	Cleared site. (Construction subject to pre-let).
River Court, 120 Fleet Street, EC4	350,000	Chinese Estate Holdings	Vacant possession 2020. Existing building to be refurbished following Goldman Sachs vacation.
Christchurch Court, EC4	301,000	Shimao Property Holdings	Vacant possession 2020. Existing building to be refurbished following Goldman Sachs vacation.
Whitefriars, EC4	217,000	JMI	Vacant possession 2021. Refurbishment following Freshfields vacation.

3 DEMAND

Occupiers are increasingly seeing one Central London market and increasingly West End occupiers are moving east. This is evidenced by the occupiers we have seen completely moving villages as pricing and a lack of large developments with large floor plates push them away from their traditional locations. In 2017, there were 26 relocations out of the West End into City & Docklands submarkets taking over 800,000 sq ft, up from 21 moves a year earlier.



From our databases we can identify the following volumes of occupiers with break options or lease expiries throughout 2022 to 2025 in Central London:

CITY & DOCKLANDS LEASE EVENTS – KEY SECTORS 2022-2025 (over 20,000 sq ft)				
<u>SECTOR</u>	<u>2022</u>	<u>2023</u>	<u>2024</u>	<u>2025</u>
Banking & finance (inc ins)	2,126,540	1,436,842	1,225,774	2,466,219
Media & technology	559,476	523,901	365,557	1,037,466
Professional services	848,534	1,260,358	179,435	1,497,398
Legal	392,888	1,431,298	830,464	1,063,490
TOTAL	4,322,652	5,344,115	3,623,089	7,125,185

WEST END LEASE EVENTS – KEY SECTORS 2022-2025 (over 20,000 sq ft)				
SECTOR	2022	2023	2024	2025
Media & technology	404,833	1,096,770	551,759	338,657
Professional services	376,429	439,324	209,037	700,948
Public & Govt	149,069	778,849	272,601	23,696
Banking & finance	696,072	325,637	53,917	92,759
TOTAL	2,229,448	3,109,198	1,526,352	8,146,843

The schedule below identifies the current named key Central London occupiers who would be primary key targets:

LEASE EXPIRIES 2020 - 2026			
NAMED TENANT	SIZE (SQ FT) APPROX	BUSINESS SECTOR	TIMING / LEASE EVENT
Ernst & Young	350,000	Professional	3 / 2026
Linklaters	300,000	Legal	9 / 2025
NBC Universal	200,000	Media	3 / 2021 – break 3 / 2026 - expiry
IBM	180,000	Technology	2023
MTV / Viacom	160,000	Media	2022 / 2027
Burberry	155,000	Fashion	5 / 2023
Sainsbury Plc	150,000 (+)	Corporation	12 / 2026
Warner Bros Distribution Ltd	125,000	Media	6 / 2024
L'Oreal	120,000	Cosmetics	6 / 2022
Microsoft	120,000	Technology	2026
Capita	100,000	Professional	5 / 2025
Funding Circle	100,000	Financial	2023

4.1 LEASING STRATEGY

The objectives of the Leasing Strategy are:

- To secure pre-letting success to allow the commencement of construction.

- To engage with tenants without being prescriptive in terms of size and floor combinations, subject to a minimum of 150,000 sq ft for Plot 2 (100,000 sq ft in the case of Plot 1).
- Once the initial transaction has completed then the aim will be to further de-risk the project achieving further pre-lettings whilst the buildings are under construction.

In respect of Plots 1 & 2, the pre-let/pre-lets achieved (roughly 1/3rd of total office accommodation for each Plot) will typically be on terms which are below the true value potential of the building in order to de-risk the project. The subsequent 1/3rd of office accommodation would be expected to transact on terms equal to the true value potential of the building with the final 1/3rd of office accommodation, when there is limited availability of office space, transacting at a premium to the true value potential of the building.

5 MARKETING STRATEGY

5.1 OVERVIEW

Buildings of this stature and quality demand an appropriate and well-planned marketing campaign to achieve the leasing strategy outlined above. This could comprise:

- Create/endorse a recognised brand that reflects and represents the quality, profile, high level of servicing, amenities and prime location of the development.
- Utilize a high-quality marketing material, that could include a marketing area within the scheme marketing suite with informative marketing literature, models, imagery, video material and web-based information.
- Promote the features, quality and flexibility of the accommodation.
- Promote the location as the new heart of media & tech in London.
- Create and maintain awareness of the product amongst potential occupiers, Central London agents and other influencers. The following initiatives are recommended:

5.2 PHASE 1 - Following Submission

It is envisaged that post submission of the planning application and prior to planning permission being secured the following elements can be prepared.

(i) BRAND

Finalise the brand and brand discipline/protocol across professional team and all representatives to ensure consistency.

(ii) PRESENTATION OF SCHEME

A portable presentation paired with a high-quality information pack should be

prepared which should include the following:

- Schedule of Net Internal Areas including offices and ancillary areas
- Site Plan
- General arrangement plans of all floors
- CGI images
- Indicative space planning
- Building specification
- Outline programme
- Professional Team
- This information can also be readily formed into a website.

A significant part of this presentation will be able to utilize the architectural material.

(iii) SOCIAL MEDIA

The need to engage with the world of social media is increasing and will be a useful tool to provide news feeds and help tell the story. A social media strategy should be devised and managed by the PR team.

5.3 PHASE 2 – Following Planning Permission

Given the large-scale work required for some of these elements (namely the marketing suite and the film work) these elements should commence following the grant of planning consent (subject to market conditions).

(i) MARKETING SUITE

A high-quality marketing suite for the scheme should include the following marketing tools which will be used to present the building(s) to prospective tenants and agents. The scheme marketing suite is likely to comprise:

RECEPTION AREA – This space should include comfortable chairs, with convenient access to a kitchen area for refreshments. CGI imagery will be shown on the walls shortly. Visitors will be greeted, and introductions made in this area.

VIDEO AREA – There will be a large screen on which to show a short CGI film introducing the scheme and the buildings Plot 1, 2 & 3, its context, immediate environment and internal appearance. This is an important opportunity to create a strong first impression.

MODEL AREA – Following the introduction, visitors to the suite will enter the model area. The scheme model will show the detail of Plots 1, 2 & 3 and put them in context to the rest of the development proposed within The Goodsyrd.

On the surrounding walls there should be imagery to emphasize for example views from the building. There should also be a selection of boards illustrating the specification, floor plans, indicative space plans and CGIs to supplement presentations or as a substitute in the event of IT failure.

THE MEETING ROOM – To be used for either discussing the scheme in more detail with prospective occupiers, examining the finishes on display or be used as a general meeting room facility.

(ii) PROMOTIONAL PRESENTATIONS

In order to create general market awareness and build the brand of the building, presentations should be arranged in the marketing suite to senior agents and other top acquisition agents within Central London in small groups.

(iii) BROCHURE

A high-quality brochure should be produced and include CGIs of not just the relevant Plots 1, 2 & 3, but also the scheme as a whole and to also a focus on transport links, local amenities, local photography, detailed plans and a full specification.

(iv) BESPOKE MARKETING LITERATURE

For specific tenant requirements/presentations, it may be desirable to prepare bespoke marketing information based on the pre-letting brochure.

(v) WEBSITE

An interactive high quality and easily accessible website should be created incorporating the fly through and full technical information. This will be updated throughout the marketing campaign. We suggest that at the early stages, it is used to promote the development at a high level and may reflect/interact with the story/messages as they change/evolve on the hoarding. Latterly it will evolve into a more conventional marketing site with all of the information available which we have in the brochure and marketing suite.

6.0 CONCLUSION

The Goodsyrd is located in the heart of what was previously designated the Northern City Fringe which is in an area which now has a strong association with the media and technology sector. The transport connections are already well established, and Liverpool Street Station and Shoreditch High Street have excellent connections to the Tube, the Overground and Mainline Train Network. Equally Crossrail when it opens (anticipated for late 2019) will benefit the area and the upgrades to the Thameslink line which improve its service to Farringdon brings Thameslink further into this area.

The mixed-use nature of the scheme is positive. The combination of the residential, hotel, public realm space, open space, retail, cultural venues and restaurant facilities will further enhance the area. This is important not just as it creates excellent amenities to the office occupiers but also to ensure the area maintains its vibrancy in the evenings and at weekends; especially as the residential development proposed for the wider area is built.

Demand in the area is focused in three main size brackets: Firstly, there are larger occupiers in the

media and tech, fin tech, financial services and professional services sectors who are seeking to locate into this part of London, as a direct result of the activity here and who are pre-letting targets which typically are requirements in excess of 100,000 sq ft.

We would envisage requirements on the size bracket 20,000 – 50,000 sq ft would lease space during construction. Smaller requirements are unlikely to pre-let but will be active post completion of the development.

As discussed above, the objective is to secure a minimum pre-let of 150,000 sq ft for Plot 2, (or 100,000 sq ft in the case of Plot 1). It is most likely that Plot 3 would not secure a pre-let on its own for the reasons given above. However, the critical mass of office space and occupier profile established by Plots 1 and 2, coupled with delivery of the substantial public realm will establish the Goodsyrd as a destination and allow Plot 3 to either to be leased during construction / post-completion.

It is likely that demand for units of between 5,000 and 10,000 sq ft will remain constant and that smaller suites, specifically for startup businesses, should also be considered. This element will need to incorporate a flexible approach to lease terms to cater for the fast expansion (and contraction) of media and technology firms. It could also integrate an incubator or co-working style space if there was sufficient demand. This shorter-term space should work very well within the Podium levels.

We would envisage that an element of the development will be leased to a co-working / serviced office operator providing flexible space options for some of the major pre-lets within the development. This needs to be considered in the context of the affordable space being delivered.

The marketing strategy set out in Section 4, is built primarily around the aim of securing a major pre-let. Once this has been achieved, and it is apparent how much space remains, then a further strategy can be developed to lease the remainingspace.

Whichever plot secures a pre-let the potential occupier will be concerned by the development disturbance immediately adjacent to them and therefore consideration will be need to be given as to building to grade the adjacent plot and associated landscaping.

Potential occupiers will also demand a sufficient and varied amenity offer, particularly a range of catering options and levels of retail in a landscaped setting. This should be integrated into the scheme from the completion of the first office building.

25/06/2019

APPENDIX 3: RETAIL MANAGEMENT STRATEGY

THE GOODSYARD

The Goodsyard Retail Strategy Planning Submission

Prepared By Shackleton on behalf of The Goodsyard JV
April 2019



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THE GOODSYARD



1.0 Introduction

The Goodsyard development offers the opportunity to create an exciting new retail destination for London, that, given its potential scale could become a scheme that both stands alone, with its own identity and appeal, but also as a substantial enhancement to the entire mixed use development, and as a beacon for all of its eventual occupiers, whether they are residential, office or retail.

The development of the site is inevitable, and is all a part of the spread of the City both northwards and eastwards. It is no longer an assumption however, that the content of such development should be purely office led. Retail, both as a functional necessity, as well as a leisure activity is firmly fixed into our everyday lives, and for many City office workers that are trying to balance their working lives with their personal ones, having places to live, play, eat and shop, close to their place of work is clearly beneficial.

The Goodsyard will be seen as a further affirmation that office, retail and indeed residential uses can sit comfortably alongside each other in the City, or at least on the edge if it. The retail elements will not only benefit from the foot traffic generated by nearby office blocks, but also both the large and

thriving local residential population, and the growing numbers of visitors to the area looking to experience something different from other more mainstream shopping areas in London.

The UK is potentially on the edge of one of the greatest shifts in our retail landscape in modern history. The consumer is demanding both convenience and experience. On one hand internet sales continue to increase largely because of breadth of choice, and ease of process, and yet on the other, they want to be entertained during their shopping trip. Remembering that 80% of retail sales are still done on the high street.

In recent years, there has been an explosion in new ways to spend your free time. Fitness and wellbeing, competitive socializing, pop-up events, and casual dining offers more variety than ever before. Thus the definitions of “retail” and “leisure” are expanding, and it is imperative that planned developments accommodate this. The Goodsyard is in an excellent position to be a trail blazer for such innovation. It could become by choice, a benchmark for successful, truly mixed use London developments and provide inspiration internationally.

THE GOODSYARD



2.0 Executive Summary

Within this report, we have set out the reasoning behind why The Goodsyard can be a thriving new destination, as well as a comprehensive explanation of how this can be achieved. We have set down a proposed mix of ground and park level uses that ensure a successful and sustainable destination that delivers what the consumer is demanding, now and in the future.

1. **London Retail Market:** Brexit uncertainty has muddied the waters of a market that sailed fairly harmlessly through the last recession.
2. **London In 10 Years:** The consumer will continue to demand experience, choice and convenience. These factors could drive a potentially exciting period of evolution in the retail landscape.
3. **Shoreditch and Spitalfields As Evolving Destinations:** The area continues to mature and establish itself as one of the most innovative, exciting, and relevant places to eat, shop and play in London. The Goodsyard is perfectly placed, and timed to become its future hub.
4. **Significant Developments in London's Pipeline:** Lessons can be learnt from other developments.

Kings Cross began marketing 4 years prior to delivery.

5. **The Goodsyard Development in brief:** Summary of the development
6. **Anticipated Pedestrian flow:** Plan showing forecast variance.
7. **Retail Vision:** A future proofed mix of uses, with an increased emphasis on f&b than previous strategy visions, as well as introducing more fitness and competitive socialising.
8. **Key Indicators for a Successful, Sustainable Development:** A summary of essential elements for a successful development. Sufficient critical mass. A scheme that attracts locals, Londoners, and beyond. A mix of uses that is a little less about retail than previously proposed, and now increasingly about restaurants, fitness and leisure.
9. **Spread of Uses Across The Development:** An analysis of how different use categories and sizes are spread across the site. There is increased F&B, fitness and leisure than previous schemes.

10. **Cultural Uses As Anchors:** We demonstrate the addition of cultural uses should not be underestimated, and can add to the story, and a sense of place to a development.
11. **Phasing:** A detailed account of how the development can incorporate meanwhile uses that enhance the project as a whole.
12. **Marketing Strategy:** Proposed program which starts as soon as planning consent is achieved, building a story leading up to availability some years in the future.



3.0 The London Retail Market

2015-2016

Demand for retail space in London continued to drive rents. London's prime locations saw boutique and store rents soar 9% in the final quarter of 2015, the fastest growth since 1988. Over the year, central London rents jumped by an average 18 percent. (CBRE Retail Research 2016). During 2016, rents continued to remain strong.

Such phenomenal increases were an indication not only of the strength of demand, but also evidence of how resilient London proved to be during the recession.

According to The WEC 2016 report, London was ranked as No 2 retail destination in the world, in terms of retail demand.

2017

We experienced a change in retail demand. London's emergence from the last recession unscathed was thwarted in part by the uncertainties of Brexit. Whilst retailers continued to achieve healthy turnovers in London, there was a sharp decrease in the number of stores looking to expand their number of outlets.

There was some respite, at least in London, as the weakening pound attracted an abundance of international tourism as consumers found their money stretching a lot further.

2018

Consumer confidence continues to be weak, and even against a backdrop of low unemployment and low inflation, the economic uncertainty is enough to further reduce consumer spending, and a subsequent reduction in requirements for new stores.

As a result, the number of retailers entering into CVAs in 2018 increased by 52%. Even if London trade remained healthy, the retail and restaurant chains were being dragged into voluntary, or involuntary arrangements by poor performing outlets across the rest of the country.



3.0 The London Retail Market

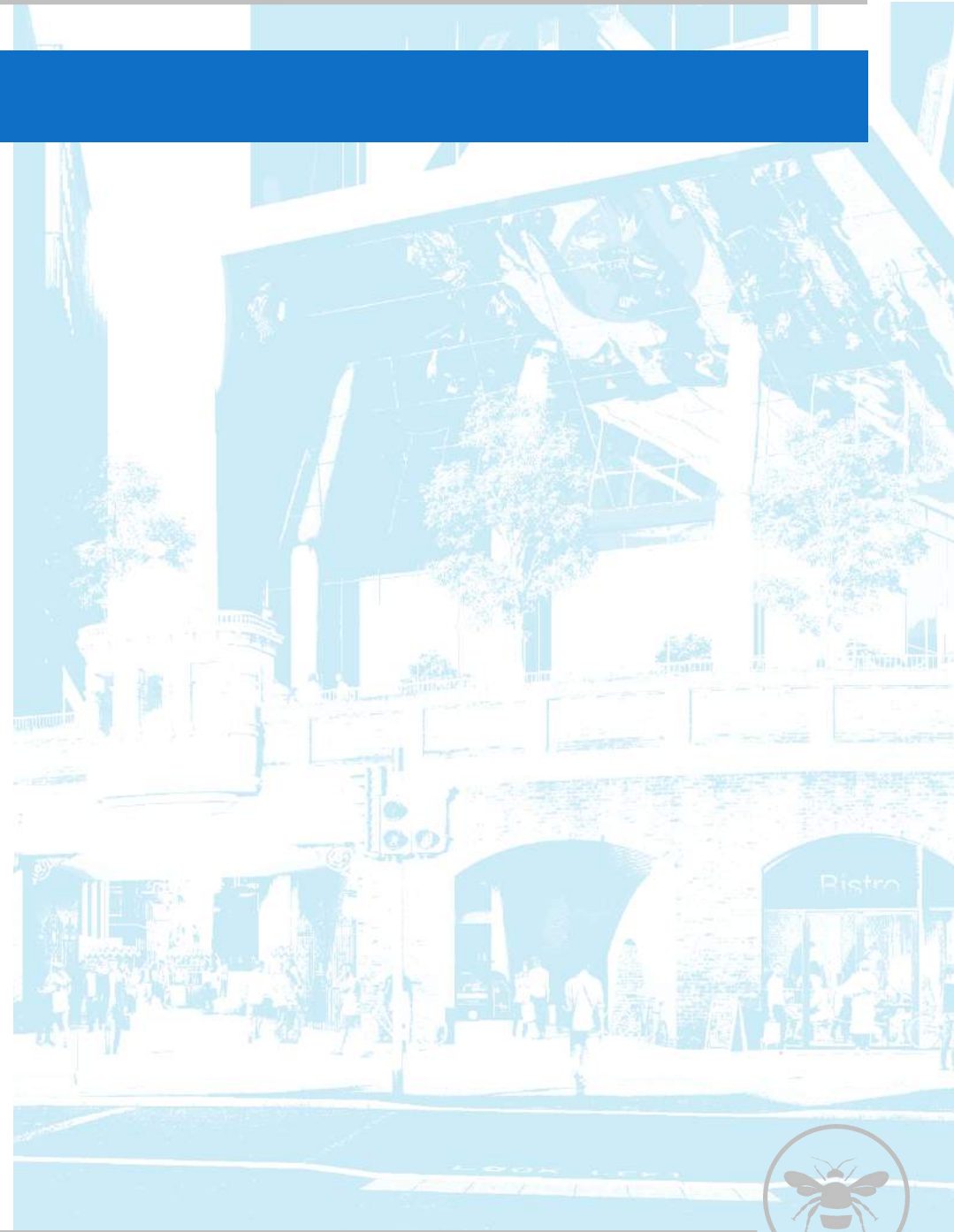
2019

Over the Christmas 2018 period, trading proved disappointing for most. Of those that showed year on year growth, this was mainly due to a good 'Black Friday' performance in November and healthy on-line sales to compensate for fewer in store transactions.

With less occupiers, chasing an increasing supply of available units, the market is seeing the ramifications of this through rents going backwards and incentive packages increasing, even in pitches previously considered 'prime'. Some key London landlords are softening their strategies and detaching themselves from Zone A tone; recognizing the future success of the pitch will rely on the vibrancy of the tenant mix. Competition between London estates is leading to landlords offering capital contributions and turnover based deals to attract the best brands and keeping on target with their aspired tenant mix.

These weak market conditions do combine to strike a fairly negative overall tone but there is opportunity within this where landlords can refine their tenant mix with less traditional style deals for attractive tenants that should be negotiated to allow for a shared reward when trading growth returns in the future. For the innovative, this could be an extremely exciting time for retailing in London.

THE GOODSYARD



4.0 London Retail In 10 Years (And How The Goodsyard Can Future Proof)

4.1 What Will London Retail Look Like In The Future?

-The growth in online retailing will continue to affect retailing. This will not in our view mean less stores in the Capital. If anything, recent history has shown that there is an appetite for more retail destinations in London.

-We will see more online stores realising that omni-channel is the way forward, and opening a physical store will actually drive more traffic to their web-sites. Online sales of clothing recorded an increase of 22 percent year-on-year in February 2018, the biggest growth since June 2013, according to the IMRG Capgemini eRetail Sales Index.

-We see more experiential stores differentiating themselves from competitors, thus furthering shopping as a leisure experience, rather than purely functional.

-We see stores keeping up with social media trends, and targeting consumers through increasingly

sophisticated data gathering and technology.

-London will continue to benefit (ahead of the rest of the country) from online stores and new foreign entrants looking to open single, high profile shops rather than multiples.

-In the last five years, digital transformation and technological change has forced companies to completely rethink the way they do business, both on and offline. Advanced use of technology will become more widespread.

-Channels will become more sophisticated and smoother, including online selling actually from within the stores. (E.g. JD Sports, Oxford Street).

-More in-store products and sales areas that interact with the shoppers (e.g. Made, Charing Cross Road).

-More understanding of shopper's needs and breaking down any blockages in the sales process

(E.g. Starbucks pre-ordering App, and no-queuing initiatives). Fifteen percent would like to see augmented reality incorporated into the buyer journey such as a digital "try before you buy" service. (IMRG Capgemini eRetail Report 2015).

-3D printed "product downloads" will be possible by 2020. There is no agreement on how far this will stretch in affecting retail, but like all online shopping, it will not be a true replacement for the leisure shopping experience.

-Continued growth in more destination uses. I.e. those that put the space and connectivity above being in a retail parade.

-Eating is the new shopping. Continued evolution in eating and drinking experiences.

-Overall, developers need more advice than ever on creating the right spaces to fit with the needs of retailers and the experiences of their consumers.



5.0 Shoreditch & Spitalfields As Evolving Destinations

- This area of east London, has experienced the same fluctuations in demand and retail economy as the rest of London.

- There have been streets that have thrived, others that have emerged as new destinations, and still others that have risen rapidly and then fallen back. There is perhaps no other London location that has seen so much change in its retail landscape in recent years.

- Redchurch Street has undoubtedly seen the most dramatic evolution over the last several years. Twenty years ago it was little more than a secondary street serving a local population. The arrival of the Tea Building, and a collection of respected brands and retailers such as APC, Labour & Wait, Caravan, followed by The Boundary Restaurant and Shoreditch House, led to more mainstream names trying to “create coolness” in their brand by taking a Shoreditch address. Jack Wills, Club Monaco, T4, Versace all took stores. However retail profits did not justify the increase in rents, and such occupiers have begun moving out. As a result rents have shrunk back from their height of 2016 to a more sustainable level.

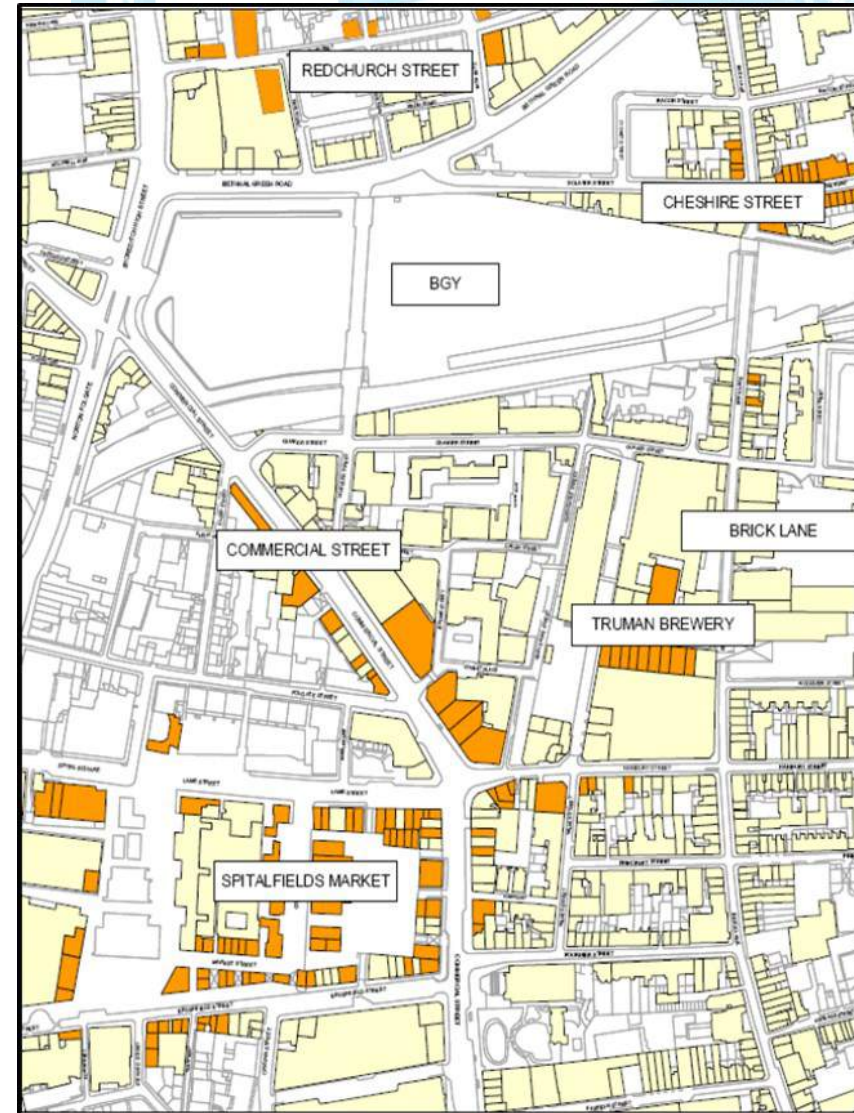
- Shoreditch High Street has been seeing a more organic growth in the last few years. The prominence and good footfall that a store or restaurant can experience here seems to be paying off. The rents and rates are still relatively low and there is a variety of sizes to choose from, often in character buildings.

- Old Spitalfields Market continues to go from strength to strength. A makeover in 2016 introduced more food to match local demand, which has proved successful. It is well placed to benefit not only from City workers, but also from weekend domestic and foreign tourists being easily accessed from Liverpool Street and Shoreditch High Street stations. The quality of brands and restaurant operators that it attracts is impressive, and rents have grown as a result.



5.0 Shoreditch & Spitalfields As Evolving Destinations

Over 100 new retail and restaurant occupiers came to the area between 2005 and 2015.



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6.0 Significant Developments in London's Pipeline

-Battersea Power Station: A total of 1.3million sq ft of commercial space, which includes 3 levels of retail (420,000sqft) a 2000 capacity auditorium, cinemas, restaurants, hotels and 6 floors of offices. Phase 1 has largely been let to restaurants or food related and marketing of Phase 2 begun last year. They have short listed two large food markets.

-Kings Cross: 400,000 sq ft of retail and leisure development with units of all sizes and characters. Coal Drops Yard is completed and occupied by a "Carnaby-esque" line up (in their words). This comprises of 60 units.

-Borough Yard: Meyer Bergman have consent for a 116,000 sq ft redevelopment of the former Vinopolis by Borough Market, together will some surrounding arches and yard space. Initial demolition work is complete and pre-lets signed with We Work and a cinema operator. They are now looking for a funding partner to complete the development.

-Elephant & Castle: Consent for 170,000 sq ft redevelopment of the current shopping centre. Delivery is still some years off.

- Canada Water: The British Land development includes 1 million sq ft of retail and leisure space. Going through the planning process so delivery still at least two years away.

-O2 Arena: 210,000 sq ft outlet centre opened at the end of last year. There are still some units yet to let.

-Hawley Wharf, Camden: Multi-level retail scheme with predominance of kiosk sized units. Total approx 200,000sqft.

Inspiration should of course be taken from other international examples, particularly those evolving retail neighbourhoods in principle cities. Mitte, Berlin; Marais, Paris and Williamsburg, New York for example.

Conclusions reached

Kings Cross is a strong comparable to The Goodsyards in terms of scale, heritage and location. Soft marketing of the development began, very sensibly, 4 years prior to delivery which helped to create a story leading up to eventual delivery. The lettings at Coal Drops Yard have been broadly successful, with a balance of largely independent occupiers and quality eateries. Criticisms include: high price point; low footfall, lack of convenience and service type occupiers; lack of strong anchor tenant; the wide expansive yard area would benefit from more activation; lack of obvious Instagramable features to photograph and help promote the scheme.



7.0 The Goodsyrd Development in Brief

Facts & Figures

Mixed use development comprising offices, residential, retail, restaurant, leisure, cultural and public space.

**Site length
400m**

200m of listed arches

5 minutes walk
from
Liverpool Street
Station (including
new Crossrail
Station)

2.2 MILLION SQ FT

11.6 Acres

1.4M sq ft
Workspace

150 room hotel

500 residential units

37,000 sq ft
Cultural space

One of the largest
regeneration sites in
London

**195,000 SQ FT RETAIL
&
LEISURE SPACE**

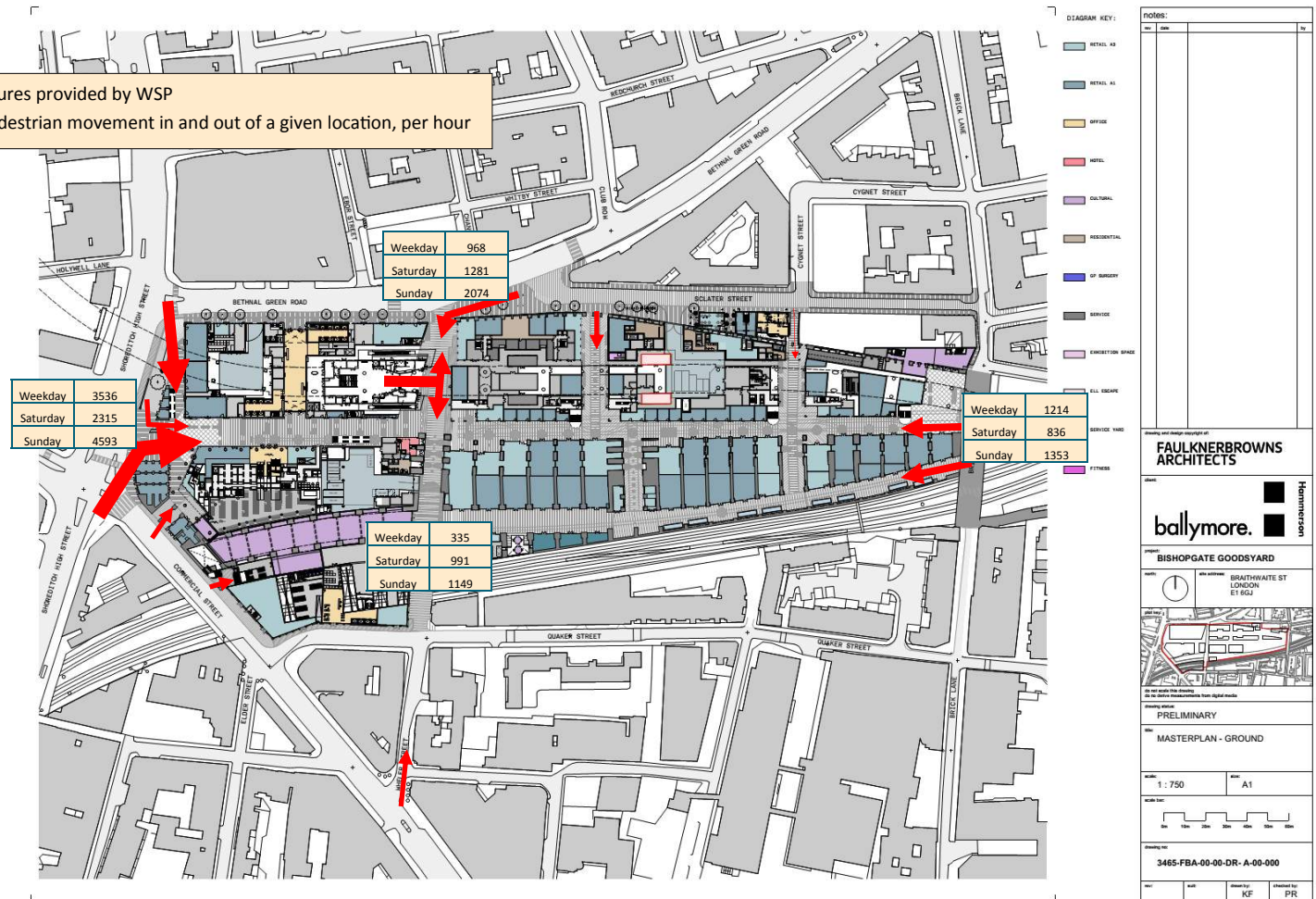
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8.0 Anticipated Pedestrian Flow

- Strongest from Shoreditch High Street
- Good weekend flow from Brick Lane
- Increasing footfall filtering through from Bethnal Green Road
- Convenience of Shoreditch High Street Overground station

Forecast figures provided by WSP
Showing pedestrian movement in and out of a given location, per hour



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9.0 Retail Vision For A Successful, Sustainable Goodsyard

9.1 KEY CRITERIA:

This has remained largely unchanged since setting down the vision for The Goodsyard in 2013:

The Goodsyard retail will...

- reflect and embrace its surroundings
 - be a new retail estate, not a shopping centre
 - celebrate its historic architectural features
 - showcase, and connect with, the high-level park
 - become a new hub for Shoreditch
 - be the most exciting new retail destination for London since the conversion of Covent Garden Market in 1974
 - attract a first class mix of operators that represent the cream of UK retail and restaurants with highlights from across the globe
- a thoughtfully curated mix of fashion, life-style, food & beverage and leisure that will seamlessly fit into the thriving cultural hub that Shoreditch has become, and what it will evolve towards
 - be infused with elements of the best of east London; locally favoured brands, restaurants and retailers, from Shoreditch, Spitalfields, Dalston, Shadwell, Hackney and Hoxton
 - be attractive first and foremost to the local resident and workforce, then the Londoner, then the tourist
 - provide some service type occupiers for locals. Research shows that occupiers like pharmacies, hair salons, dry cleaners, convenience stores, actually increase dwell times

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10.0 Retail Vision For A Successful, Sustainable Goodsyard

10.1 What should be added to this list for 2019?:

- In a shifting retail market, the development should offer as much flexibility in terms of size of units, planning use classes, and leasing structures as possible
- Truly omnichannel retailers should be accommodated
- Fitness and well-being is here to stay, and should be incorporated
- Competitive socialising concepts like Swingers Urban Golf; Flight Club Darts; Escape Rooms add vibrancy and valuable publicity
- Events and Pop-ups is an area that has matured and evolved into a recognisable part of London's landscape. Venue Lab (Print Rooms); Pergola; Peckham Levels and street food markets are the type of occupiers that will ensure The Goodsyard fulfils many of the objectives above by attracting independents from the local area and beyond, and ensuring the development never feels like a sterile shopping centre
- Allowing for phasing not only to ensure each phase fits seamlessly with subsequent phases, but also to recognise the importance of meanwhile uses, particularly those that could be incorporated into the finished development
- We have in the past referred to the retail line-up being similar to Carnaby. We have to ask is this still relevant? The Carnaby tenant mix has deteriorated considerably, now a 'Soho' mix with an east end twist on it is likely to be the way forward. But, above all the development at this stage needs to be flexible and fleet of foot to prepare a stage for the future evolution which is inevitably going to be less about conventional retail and more about a broader mix of uses
- Essential that the development provides dedicated outside seating for all F&B (i.e. not counted as public realm by the respective planning authorities)
- The proposed "cultural" area/s should be seen as potentially very positive anchors (e.g. English National Ballet moving to London City Island)
- We note that there is a likelihood that the park level and all public routes are to be open 24 hours a day. We appreciate this may get scaled back for security reasons, however we support the general principle of creating an environment that is as close to a typical London open street as possible
- The addition of hotels at park level will add vibrancy and further footfall. We strongly recommend you have control of the restaurant units within these.



11.0 Key Indicators For Success Of The Planned Design

- Sufficient retail critical mass at ground level
- Potential for larger, anchor units facing Shoreditch High Street
- Smaller units, suitable for independents at Brick Lane end (This will need to include splitting some of the arches from north to south)
- Potential for high percentage of F&B
- Dedicated outside seating for all F&B
- Potential for a cultural anchor
- Potential for an events space
- Historic arches add invaluable character (Essential that the new buildings reflect this)
- Connectivity with park level
- Generous public realm
- Instagramable features need to be incorporated
- Inclusion of creative meanwhile uses should be seen to enhance rather than devalue the development
- Control of the restaurant units within the hotels. This allows us to curate the mix of all F&B on site

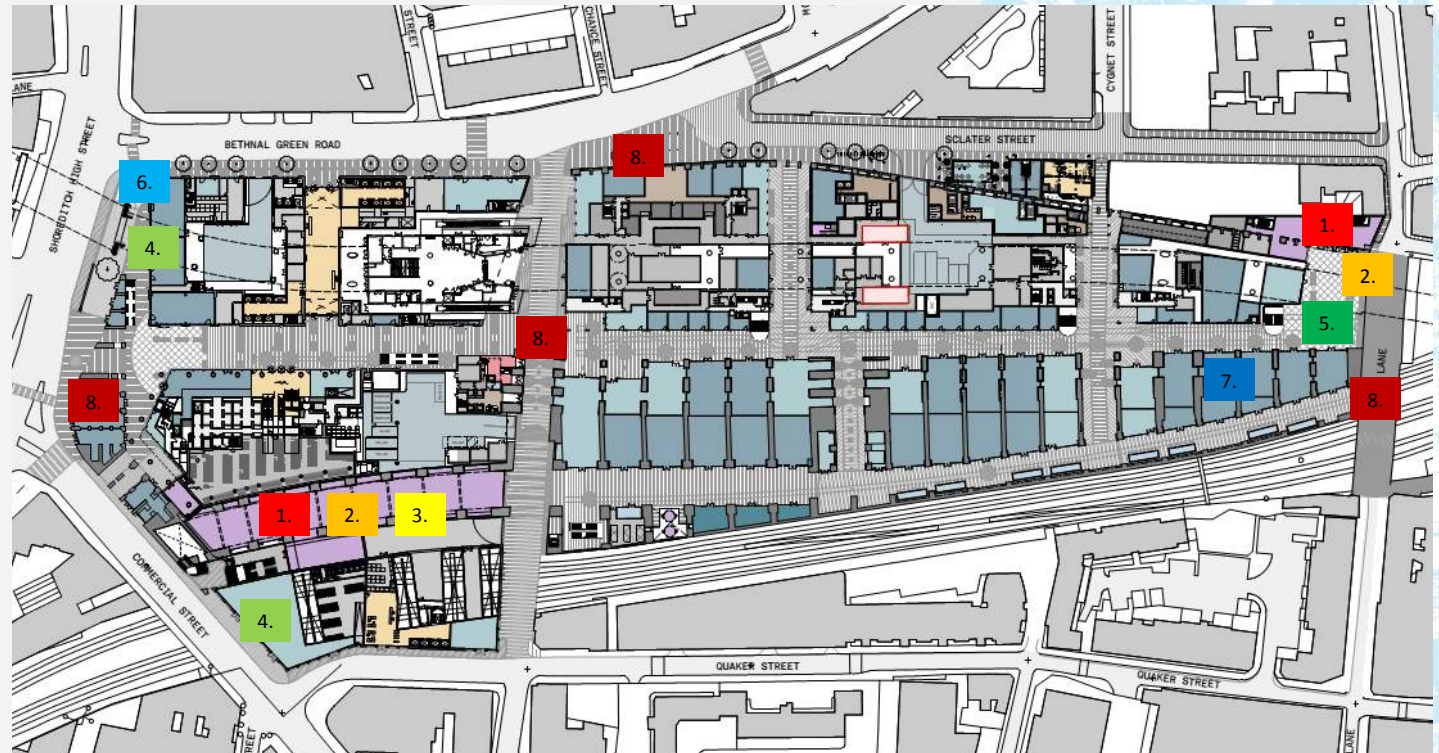


12.0 Key Indicators For Success Of The Planned Design

12.1 How these key points for success can be accommodated within the planned development:

GROUND:

1. Cultural uses could be potential anchors
2. Space for events
3. Competitive socialising space?
4. Flexibility in size is essential. Units should be combinable or partitionable wherever possible
5. Dedicated outside seating is essential (and not form part of planning public realm commitments)
6. Sufficient size for anchor tenants
7. Smaller units at Brick Lane end for independent occupiers
8. Important to incorporate Instagramable moments / icons (e.g. Faulkner Brown's proposed "Train Stack".)



12.0 Key Indicators For Success Of The Planned Design

12.2 How these key points for success can be accommodated within the planned development:

PARK / FIRST LEVEL:

- 1. Cultural uses could be potential anchors
- 2. Space for events
- 3. Competitive socialising space?
- 4. Flexibility in size is essential. Units should be combinable or partitionable wherever possible
- 5. Dedicated outside seating is essential
- 8. Important to incorporate Instagramable moments / icons (e.g. Faulkner Browns proposed "Train Stack".)



13.0 Spread of Uses Across The Development

There is a healthy spread of three principal use categories across the site. Note that whilst the percentage of F&B may be very slightly low at 37%, this is likely to be supplemented by any outside events, coffee carts or concessions that will inevitably occur, particularly in the public realm.

The floor area suitable for fitness could switch to “competitive socialising” within the same D2 planning use, and can be determined by demand for each of the two categories closer to delivery

Retail	49%
F&B*	40%
Fitness or Competitive Socialising	11%
+ Cultural use	

Retail	7,800 sq m / 84,000 sq ft
F&B*	5,480 sq m / 59,000 sq ft
Fitness or Competitive Socialising	1,625 sq m / 17,500 sq ft
+ Cultural use	

*F&B includes restaurants, bars, cafes, coffee shops, grab-n-go and can be further enhanced by events, outside markets etc.



14.0 Spread of Unit Sizes Across The Development

With 45% of the units being less than 80 sqm this lends the opportunity to let a significant proportion of the development to local, independent or start-up occupiers. Moreover, with only 4% of units over 500 sqm, the scheme will not be dominated by large global brands.

The overall spread of sizes is designed to fit with both the range of uses referred to above, but also the specific Tenant Profile.

0 to 40 sqm	26%
41 sqm to 80 sqm	19%
81 sqm to 500 sqm	51%
500 sqm to 1000 sqm	4%

It should be noted that these figures allow for some partitioning of units. These show that over 96% of units are less than 500 sqm. These reflects not only the surrounding area, but also comparable locations across London such as Carnaby Street, Covent Garden, Seven Dials and Kings Cross. This, of course allows flexibility to create larger units if the market demands it in the future.



15.0 Cultural Uses As Anchors

It is almost inevitable that the successful planning consent of this site will be one that incorporates a “cultural use”.

The retail landscape is changing, as we have set out in this report. The consumer is demanding a bigger, better experience wherever they are spending their time and usually money. The Goodsyard has the opportunity to deliver this experience. It already has some key elements in its architecture and public park spaces, as well as its location. Adding a strong cultural use, as part of a Section 106 agreement can: add value; be a place-maker; increase publicity; increase “Instagramability”; become *the* icon for the development; and drive additional footfall. Ensuring these uses are publically accessible is a way of engaging with the visitors to The Goodsyard, as well as the wider community.

London City Island is a mixed use development with over 1700 apartments. It's identity has been greatly enhanced by providing (not as part of a Section 106 agreement) a 90,000sqft base for The English National Ballet. As if that was not enough, they are also securing The London Film School.

Engaging with potential cultural occupiers at the earliest possible stage is essential, and beneficial.

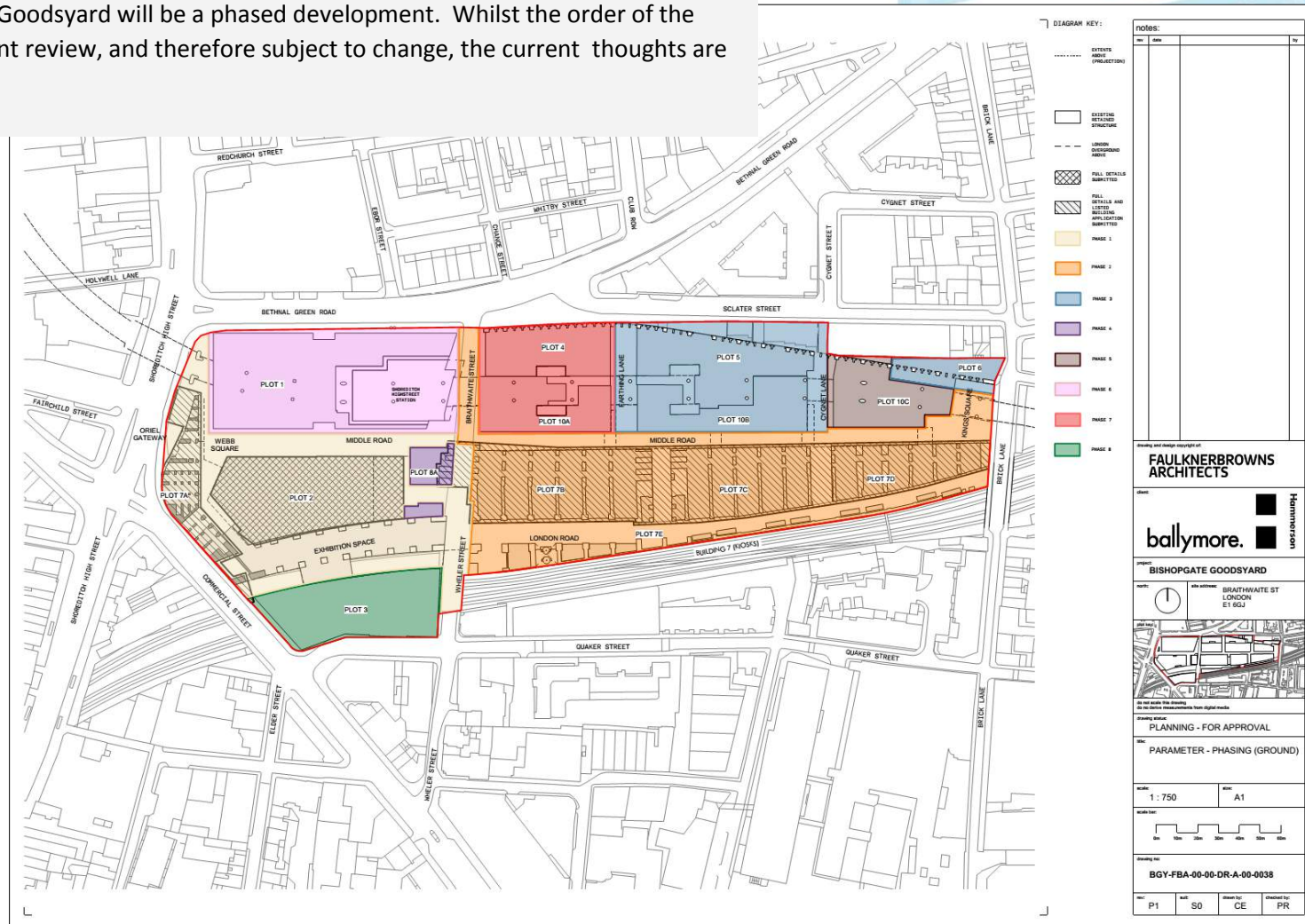


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16.0 Phasing

16.1 It is apparent that The Goodsyard will be a phased development. Whilst the order of the phases will be under constant review, and therefore subject to change, the current thoughts are as shown here:



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16.0 Phasing

16.2 Phasing implications:

Ideally the entire development should be delivered in a single phase. However this is not achievable and thus the following steps are recommended:

- As many of the entry points into the site should be opened (particularly the west and east entry points) to allow free flow through the site as much as possible.

- The design of the entry points, even if just temporary need to be given careful consideration and should have appeal, be relevant to the finished development, and be Instagram-able.

- As much as possible of the site that falls within later phases should have meanwhile uses. These will benefit the site, and the surrounding area if they achieve the following:

- Attract footfall
- Generate PR
- Be relevant to the finished development
- Generate income or at least be cost neutral

- Offer a range of consumer attractions throughout the day, and week

- Some of these meanwhile uses may need initial investment from the JV, but given there may be several years between phases, there is the opportunity of recouping this investment

- Incorporating Boxpark (even if it evolves into a purely food led operation) in the short term, but potentially a more permanent arrangement may be a worthy option.

- As soon as the park level is activated, this, too could incorporate meanwhile uses, particularly those making use of any landscaped areas—Fitness, wellbeing, yoga etc.

- Meanwhile uses can also be seen as a way of experimenting with both uses, and lease structures. E.g percentage of t/o

The Goodsyrd team is right to be excited about delivering an evolving story on the site.



16.0 Phasing

16.2 Phase 1 Retail Strategy:

It is proposed that Phase 1 will be Building 2, and large parts of the western end of the site. Therefore the proposed retail strategy for phasing is:

- Ensure proposed uses in Phase 1 are self sustaining and not temporary. As units in this block are street facing, this will be achievable.
- Boxpark could remain in Phase 6, and potentially increase its f&b offer
- Plots 4 & 5 have the opportunity to provide a long list of pop-up occupiers, nomadic cinemas, temporary events, immersive entertainment , and F&B operations that would be more relevant, and bring the right kind of footfall for The Goodsyard. It would also be an excellent way to start building a story for the site leading up to eventual completion.
- Plot 7 would require further structural work to ensure it is safe for use. But once complete it could provide an exciting mix of temporary uses.

Pergola
Vinegar Yard Collective
Venue Lab
Ginger Line
Secret Cinema
Mercato Metropolitano
Dinerama
Model Market
Hawker House
Kerb
Neverland
Winter Ville
Good Food Festival
Octoberfest
Affordable Art Fair
Junkyard Golf
Flight Club
Whistle Punks
Escape Rooms
Nomad Cinema
Action Station
Epicurean
Bounce

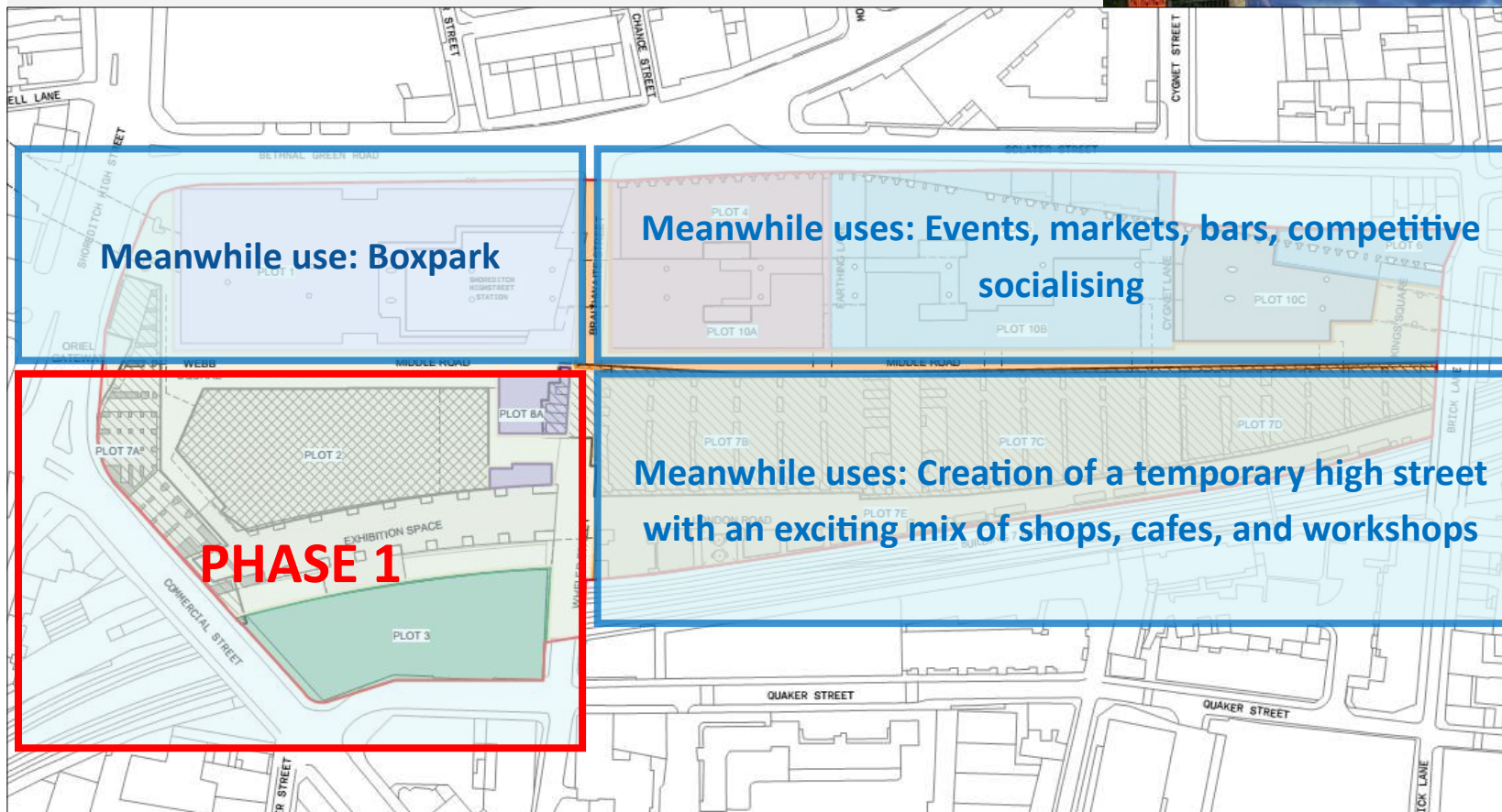


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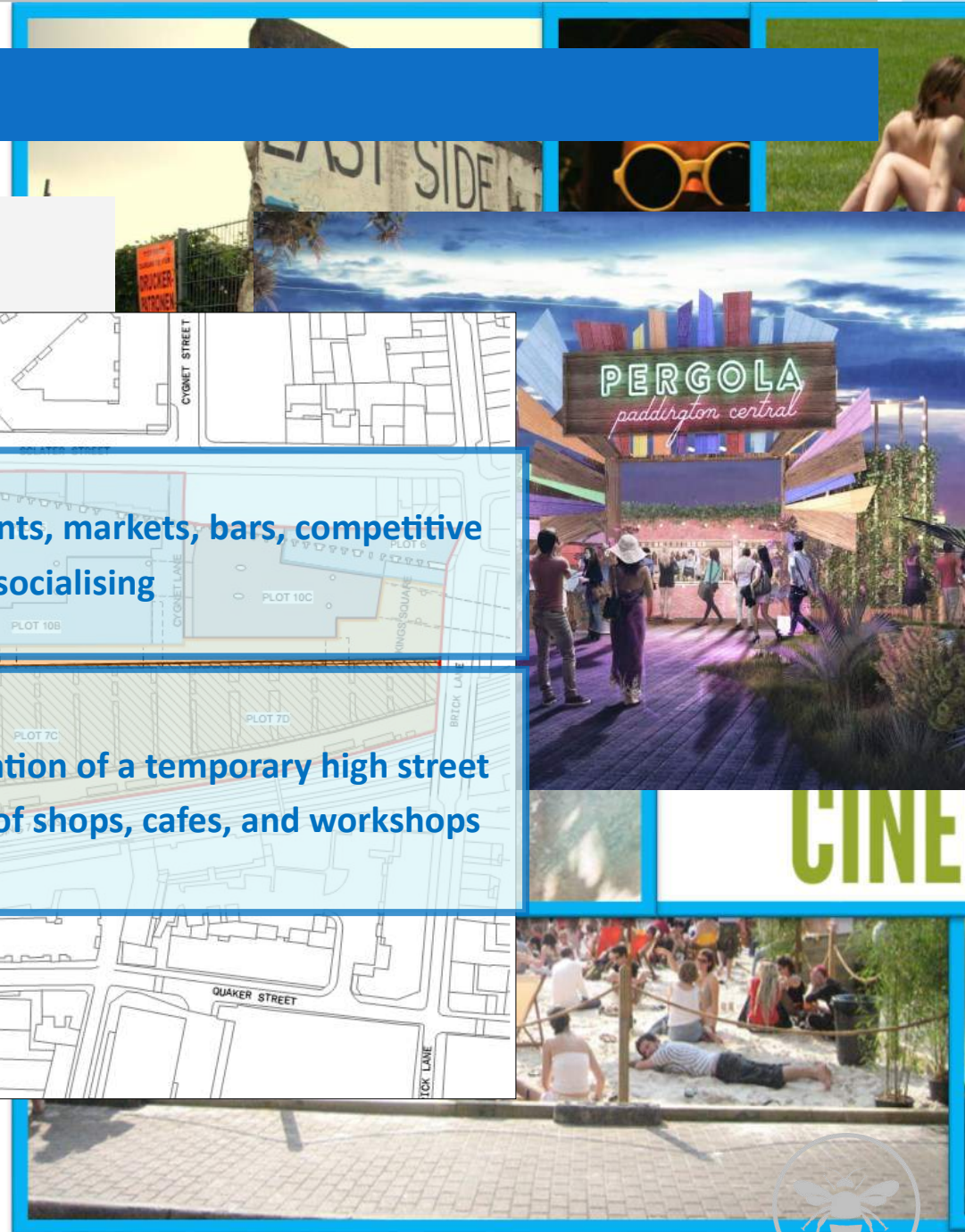


16.0 Phasing

16.3 Phase 1 Retail Strategy



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17.0 Marketing Strategy

17.1 High level objectives:

- Marketing should be on a global basis. The Goodsyard can be a key platform for new entrants to expressive themselves within an impressive location and development.
- Start early. Kings Cross began soft marketing 4 years prior to delivery.
- Clear vision that all of the Goodsyard team can understand, and present externally.
- Given the potential diversity of occupiers and uses, the marketing will need to be appropriate to differing audiences.

17.2 Building a story

Steps:

1. Goodsyard team to agree on vision
2. Beauty parade of PR companies to start soft campaign. To commence from receipt of planning consent
3. Commence conversations with anchors for key units from UK and abroad
4. Commence discussions with meanwhile uses
5. Arrange a reception for key agents
6. Arrange foreign brand spotting city trips and trade shows

17.3 Initial Marketing Material required

- Overall vision document
- Document focusing on Phase 1
- Document focusing on meanwhile use opportunities
- Website to evolve to become more B to B focused
- Information portal
- Tenant Packs for Phase 1 and meanwhile uses

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