

THE GOODSYARD

Environmental Statement Addendum Volume 2

September 2019 – Chapter 16 of 21

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CHAPTER 16: BUILT HERITAGE

16.1 INTRODUCTION

- 16.1.1
- There have been no updates to the Baseline Assessment or changes to the methodology from the assessment undertaken on the 2015 Proposed Development
- 16.1.2
- Following consultation with Historic England, the design of Plot 2 (the only elements of the 2015 Proposed Development visible within the setting of the WHS) has been reviewed and revised so that the Revised Scheme would not be visible in views of and from the Tower of London World Heritage Site.

16.2 SCOPE OF ASSESSMENT

- 16.2.1
- This chapter of the Environmental Statement (‘ES’) Addendum assesses the likely significant effects of the Revised Scheme in terms of built heritage assets and is supported by **ES Volume 4, Appendix K: Built Heritage**.
- 16.2.2
- The chapter describes: the assessment methodology; the baseline conditions currently existing at the site and in the surrounding area; the likely significant environmental effects; the mitigation measures required to prevent, reduce or offset any significant adverse effects; the likely residual effects after these measures have been employed; and the cumulative effects associated with the Revised Scheme in combination with other developments within 1 km of the site.

16.3 KEY LEGISLATION, POLICY AND GUIDANCE CONSIDERATIONS

- 16.3.1
- The built heritage assessment has been undertaken within the context of relevant planning policies, guidance documents and legislative instruments. These are summarised below.

Legislation and Regulation summary
- 16.3.2
- Planning (Listed Buildings and Conservation Areas) Act 1990** (‘the Act’) is the legislation governing listed buildings and conservation areas.
- 16.3.3
- Section 7 of the Act controls the demolition, alteration or extension of a listed building. It sets out that ‘no person shall execute or cause to be executed any works for the demolition of a listed building for its alteration or extension in any manner which would affect its character as a building of special architectural or historic interest’ unless those works are authorised;
- 16.3.4
- Section 16(2) sets out that the decision maker has a duty to pay special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses;
- 16.3.5
- The Act also highlights the importance of the setting of heritage assets as part of broader planning considerations. Section 66 states that in considering ‘whether to grant planning permission for development which affects a listed building or its setting, special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses’.
- 16.3.6
- Section 66(1) requires decision makers to ‘have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses” when determining applications which affect a listed building or its setting;
- 16.3.7
- Section 72(1) requires decision makers with respect to any buildings or other land in a conservation area to pay ‘special attention... to the desirability of preserving or enhancing the character or appearance of that area.

¹ Ministry of Housing, Communities & Local Government (2019): National Planning Policy Framework, 19 February 2019.

² Greater London Authority (2016) The London Plan the spatial development strategy for London consolidated with alterations since 2011, March 2016.

³ Greater London Authority (2017) Draft London Plan, 29 November 2017.

Planning Policy

National Planning Policy Framework

- 16.3.8
- The revised National Planning Policy Framework (‘NPPF’) was published on 19 February 2019 and sets out the government’s planning policies for England and how these are expected to be applied.¹ Chapter 16 of the NPPF: ‘Conserving and enhancing the historic environment’ deals with Heritage Assets describing them as ‘an irreplaceable resource’ that ‘should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations’.

London Plan

- 16.3.9
- London-wide planning policy is governed by the Mayor of London’s London Plan (2016).² This contains policies relating to architecture, urban design and the historic built environment. A draft new London Plan was published for consultation in December 2017 and is in the process of being reviewed.³ The Mayor published the Draft London Plan: Minor Suggested Changes on 13th August 2018. Whilst the London Plan (2016) is still the adopted Development Plan, the Draft London Plan is a material consideration in planning decisions. Chapter 7 ‘Heritage and Culture’, of the new draft plan, echoes and expands upon the policies of the 2016 plan:
- 16.3.10
- Draft Policy HC1 ‘Heritage Conservation and Growth’: includes the direction that ‘Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets’ significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings, should also be actively managed. Development proposals should seek to avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.’;
- 16.3.11
- Draft Policy HC2 ‘World Heritage Sites’: ‘Development proposals in World Heritage Sites and their settings, including any buffer zones, should conserve, promote and enhance their Outstanding Universal Value [...]’.

London’s World Heritage Sites – Guidance on Settings⁴

- 16.3.12
- The intention of the Supplementary Planning Guidance to the London Plan is to ‘ensure a more consistent interpretation of setting and understanding of their importance in contributing to an appreciation of Outstanding Universal Value to help support consistency in decision making to conserve the World Heritage Site’s Outstanding Universal Value, integrity, authenticity and significance

Local planning policy.

- 16.3.13
- This is governed by the two London Boroughs within which the site falls: the London Borough of Hackney (‘LBH’) and the London Borough of Tower Hamlets (‘LBTH’).

Bishopsgate Goods Yard Interim Planning Guidance (‘IPG’) (2010)⁵

- 16.3.14
- This sets out a number of objectives which include ‘to ensure new development on the site integrates with the surrounding area, taking into account local character’ and ‘to provide guidance on the retention and re-use of historic structures that remain on the site.’
- 16.3.15
- Development Principle BG1 sets out design principles for the site.
- 16.3.16
- BG6 states that development on the site should enhance and integrate the listed structures by: refurbishing and re-using the arches beneath the Braithwaite Viaduct for shops, leisure and culture uses; using the area above the Braithwaite Viaduct for open green space; retaining and integrating the listed Forecourt Wall, Oriel and Gates into any development. The accompanying text (2.25-2.26) asks that the Sclater Street wall and weavers’ cottages be retained if possible and integrated into the development. It sets out at 2.27 that ‘Demolition of the unlisted brick arches on the western part of the site may be appropriate where it would help to increase permeability and provide connections to the surrounding streets.’;
- 16.3.17
- BG9 states that Bishopsgate Goodsyard has a strong historical context. Proposals should respond to this through re-use of historic structures on the site and deliver improvements to the setting and access to historic structures;

⁴ Greater London Authority (2012), London’s World Heritage Sites – Guidance on Settings, Supplementary Planning Guidance, London Plan 2011 Implementation Framework.

⁵ Greater London Authority, London Borough of Hackney, London Borough of Tower Hamlets (2010) Bishopsgate Goodsyard Interim Planning Guidance.

16.3.18 BG10 sets out 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.’ This is the only policy reference to conservation areas in the IPG.

London Borough of Hackney (LBH)

16.3.19 The Core Strategy (2010)⁶, Development Management Local Plan (2015)⁷, London Plan and other supplementary planning documents are used to assess planning applications. The Hackney Local Plan 2033 (LP33)⁸ is being consulted upon. Once adopted LP33 will combine and replace existing plans.

16.3.20 Core Strategy: Policy 25 relates to the Historic Environment and says that ‘All development should make a positive contribution to the character of Hackney’s historic and built environment. This includes identifying, conserving and enhancing the historic significance of the borough’s designated heritage assets, their setting and where appropriate the wider historic environment;

- Development Management Local Plan: Policy DM28 ‘Managing the Historic Environment’ deals with conservation areas, listed buildings, other assets and archaeology. The Policy requires that ‘Development in or adjacent to the Borough’s Conservation Areas shall preserve or enhance the character and appearance of the respective Area.’;
- LP33: Chapter 5. ‘Protecting and Enhancing Heritage and Leading the Way in Good Urban Design’ advises that ‘All new development in Hackney should seek to preserve, and where appropriate enhance the borough’s designated and non-designated heritage assets.’ Policy LP3 Designated Heritage Assets, LP4 Non Designated Heritage Assets, LP5 Strategic and Local Views and LP6 Archaeology all update and reinforce previous policy set out in the Development Management Local Plan (2015).

Conservation Area Appraisal: South Shoreditch⁹

16.3.21 This describes the historic development of the conservation area and its character and appearance and identifies key management proposals for the area.

London Borough of Tower Hamlets (LBTH)

16.3.22 The Core Strategy (2010)¹⁰, Managing Development Document (2013)¹¹, London Plan and other supplementary planning documents, are used to assess planning applications. LBTH is consulting on the Tower Hamlets Draft Local Plan which sets out a proposed vision, objectives and planning policies to positively plan and manage development in the borough up to 2031¹².

- Core Strategy: Policy SO22 makes strategic provision for the historic environment. It sets out that the Borough will ‘protect, celebrate and improve access to our historical and heritage assets by placing these at the heart of reinventing the hamlets to enhance local distinctiveness, character and townscape views’.
- Managing Development Document: Policy DM26 relates to Building Heights across the Borough. It sets out that proposals for tall buildings will need to meet a number of criteria including that they should not adversely impact on heritage assets. Policy provision in relation to World Heritage Sites is made at policy DM28. Development will need to ensure it does not negatively affect the UNESCO World Heritage Site status of the Tower of London. Development proposals must be tested against the site’s Outstanding Universal Value ensuring that this is sustained and enhanced as a result of the Revised Scheme.
- Draft Local Plan 2031: Section 4.3 deals with ‘Design and Historic Environment’. Strategic Policy DH 3 ‘The Historic Environment’ requires that development of or within a designated and non-designated heritage asset or asset of community value will only be permitted where it does ‘not result in an adverse impact on the character, fabric or identity of the heritage asset or its setting’; that it is ‘appropriate in terms of design, scale, form, detailing and materials in its local context’; and where it ‘enhances or better reveals the significance of assets or their settings’ or ‘preserves views identified in the updated Character Appraisals and Management Guidelines and additional locally important views. Proposals for the demolition of a heritage asset will only be considered under exceptional circumstances where substantial public benefit outweighs the substantial harm of demolition. Policy DH 4 deals with World Heritage Sites. It requires that development should, ensure that ‘it does not negatively affect the UNESCO World Heritage Site status of the Tower of London or Maritime Greenwich.’

⁶ London Borough of Hackney (2010) Core Strategy: Hackney’s strategic planning policies for 2010-2025.

⁷ London Borough of Hackney (2015) Development Management Local Plan.

⁸ London Borough of Hackney (2018) Proposed Submission Local Plan (LP33), November 2018.

⁹ London Borough of Hackney (2009) South Shoreditch Conservation Area Appraisal.

¹⁰ London Borough of Tower Hamlets (2010) Core Strategy.

¹¹ London Borough of Tower Hamlets (2013) Managing Development Document.

Conservation Area Character Appraisals and Management Guidelines

16.3.23 These describe the historic development of each conservation area and its character and appearance and identifies key management proposals for the area. Appraisals exist for: Boundary Estate Conservation Area (2007), Elder Street Conservation Area (2007), Redchurch Street Conservation Area (2009), Brick Lane and Fournier Street Conservation Area (2009).

Tower of London World Heritage Site Management Plan and Tower of London Local Setting Study.¹³

16.3.24 All World Heritage Sites are required by UNESCO to have a Management Plan the purpose of which is to ensure effectual management and to provide an agreed framework for long-term decision-making on the conservation and improvement of the Tower. The Local Setting Study sets out aims and objectives for conserving, promoting and enhancing appreciation of the Outstanding Universal Value of the Tower, and to act in partnership with statutory authorities to safeguard and enhance the local setting of the Tower.

Technical Standards and Guidance

Planning Practice Guidance¹⁴

16.3.25 This provides streamlined guidance for the National Planning Policy Framework and the planning system. It includes guidance on matters relating to protecting the historic environment in the section entitled ‘Conserving and Enhancing the Historic Environment’ which gives advice on the following areas:

- Overview: historic environment;
- Plan making: historic environment;
- Decision-taking: historic environment;
- Designated heritage assets;
- Non-designated heritage assets;
- Heritage Consent Processes; and
- Consultation and notification requirements for heritage related applications.

Historic Environment Good Practice Advice Notes¹⁵

16.3.26 Historic England provide guidance regarding the setting of heritage assets and how to assess the effect of change on that setting. They provide ‘information on good practice to assist local authorities, planning and other consultants, owners, applicants and other interested parties in implementing historic environment policy in the National Planning Policy Framework (NPPF) and the related guidance given in the national Planning Practice Guide (PPG)’. These notes are:

- GPA 1: The Historic Environment in Local Plans (2015);
- GPA 2: Managing Significance in Decision-Taking in the Historic Environment (2015); and
- GPA 3: The Setting of Heritage Assets (2nd ed., 2017).

Historic England Advice Notes¹⁶

16.3.27 These advice notes covering various planning topics in more detail and at a more practical level. They have been prepared by Historic England following public consultation. The documents most relevant to the Revised Scheme are:

- HEA 1 - Conservation Areas;
- HEA 2 - Making Changes to Heritage Assets;
- HEA 4 - Tall Buildings; and
- HEA 10 - Listed Buildings and Curtilage.

¹² London Borough of Tower Hamlets (2016) Plan Draft Local Plan 2031, November 2016.

¹³ Historic Royal Palaces (2016; 2010).

¹⁴ Ministry of Housing, Communities & Local Government (2018) National Planning Practice Guidance: Conserving and enhancing the historic environment.

¹⁵ Historic England, Online: <https://historicengland.org.uk/advice/planning/planning-system>

¹⁶ Historic England, Online: <https://historicengland.org.uk/advice/planning/planning-system>

16.3.28 English Heritage sets out in this document a logical approach to making decisions and offering guidance about all aspects of England’s historic environment. It defines ‘conservation’ as ‘the process of managing change to a significant place in its setting in ways that will best sustain its heritage values, while recognising opportunities to reveal or reinforce those values for present and future generations.’ The document describes a number of ‘heritage values’ that may be present in a ‘significant place’. These are evidential, historical, aesthetic and communal value. Conservation areas, listed buildings and locally listed buildings have evident special architectural and historic interest. Any proposals for a site must have regard for the preservation of this special interest.

The National Heritage List for England and Historic Environment Records

16.3.29 The National Heritage List for England (NHLE) is maintained by Historic England and is the official, up-to-date, register of all nationally protected historic buildings and sites in England – which covers listed buildings, scheduled monuments, protected wrecks, registered parks and gardens, and battlefields. Historic Environment Records (HERs) are sources of, and signposts to, information relating to assets on the NHLE and can be searched through the Heritage Gateway website.

16.4 CONSULTATION

- 16.4.1 Consultation has been undertaken on the Bishopsgate Goodsyards: Heritage Fabric Assessment (March 2019) located in ES Volume 4, Appendix K: Built Heritage). A presentation of this assessment document was made to the LBTH, LBH and Historic England on 4 March 2019. A summary of the discussion follows:
- 16.4.2 The Oriel Gateway and Walls: discussion focused the setting of the Oriel Gateway and its relationship to the adjacent proposed building 2 and the need to not compromise the Oriel in views towards site; that site levels around the Oriel window should reinstate the historic experience of being able to look through it to Shoreditch High Street; proposals to carefully conserve and restore the Oriel were welcomed; comments were made around the new site levels and the parapet height and the desire to keep the historic relationship of floor to parapet height without having to add a safety rail.
- 16.4.3 The Braithwaite Viaduct: discussion centered around the extent and complexity of the investigative works that have to be undertaken in terms of building on top of the arches. It was made clear that that the main objective is to not make major structural interventions, i.e. piling through the arches and that we would put forward a sensitive proposal which builds to the maximum loading that the existing structure can take.
- 16.4.4 Townscape: it is acknowledged that the impact of tall buildings upon the site and some of the surrounding conservation areas will be high and therefore are cognisant of the need for an excellent architectural response to help mitigate that impact.
- 16.4.5 A review of the Scoping Opinion was requested by the Applicant in March 2019 subject to the Revised Scheme. **Table 16.1** outlines the comments received in the 2019 Scoping Opinion Review and where they have been addressed in this documentation.

Table 16.1 Scoping Opinion Comments and Response

Topic / Section	Summary of Comment	Location within the ES Addendum where comments are addressed
2019 Scoping Opinion Review	Reference to scheduled monuments or registered parks and gardens.	Scheduled monuments are dealt with in the archaeology chapter. The single registered landscape that is relevant is assessed in this chapter. reference is made to relevant guidance in this chapter.
	Reference to guidance for the assessment of the significance of heritage assets or the contribution that setting makes to that significance.	
2014 Scoping Opinion	Paragraph 4.164 of 2014 Scoping Opinion: “A clear analysis of the heritage significance of each affected heritage asset, including the contribution of its setting to heritage significance, should be provided. All judgements on the significance and direction of effects on heritage assets (including the World Heritage Site) need to be fully explained and justified.”	Built Heritage Townscape and Visual Impact

¹⁷ Historic England (2008) Conservation Principles, Policies and Guidance for the Sustainable Management of The Historic Environment.

16.5 ASSESSMENT METHODOLOGY

Determination of Baseline

- 16.5.1 The site is located to the north of the City of London partly within the LBH and partly within the LBTH. There are a number of heritage assets within and surrounding the site and others further afield that have the potential to be affected by the Revised Scheme. The study area therefore includes:
- The Tower of London World Heritage Site;
 - Conservation Areas within 500m of the site;
 - Listed Buildings within 500m of the site; and
 - Locally Listed Buildings within 500m of the site.
- 16.5.2 The site baseline will be considered in the context of the following areas of the site:
- Area of the site applicable to the detailed component of the Revised Scheme; and
 - Area of the site applicable to the outline component of the Revised Scheme.
- 16.5.3 The methodology used for this assessment is summarised as follows:
- A systematic data search for heritage assets or receptors in the vicinity of the site that may be affected by the Revised Scheme. The historic background to the site has been documented using sources of information held in the London Metropolitan Archives, the National Rail Archive, Historic England’s historic planning files and Historic England’s National Monument Record and the National Heritage List for England, London Borough of Tower Hamlets’ Local History Library and Archives and Hackney Archives. The range of sources considered included historic maps and photographs and a wide range of relevant secondary sources. These have been used to prepare an assessment of the site and its context. This work is included within the Heritage Statement (**ES Addendum, Volume 4, Appendix K: Built Heritage**). The research has been complemented with a detailed site and context walkover survey.
 - Detailed walk-over surveys of the site and its context (September-December 2013);
 - Assessment of the built heritage potential both on the site, its immediate vicinity (up to a 500m radius from the site), and within the context of the wider area. It should be noted that this approximate zone of potential influence of the Revised Scheme on heritage assets has been assumed as the worst-case maximum likely zone of potential impact, not as the actual extent of likely impacts; and
 - A review of the Revised Scheme and assessment of the likely impacts resulting from the Revised Scheme, based on professional judgement.

Prediction Methodology

Methodology for Determining Impacts During Construction Phase

- 16.5.4 This chapter thoroughly assesses plans and drawings in relation to the Revised Scheme; the suggested construction methods and phasing of construction and liaison with the design team; the types of buildings proposed in the development; their likely methods of construction; the extent and nature of demolition leading to site clearance for the erection of proposed new buildings and structures; and then considers the likely physical and visual impacts on heritage assets that may arise.

Methodology for Determining Impacts During Operational Phase

- 16.5.5 This chapter identifies from the development brief the nature of proposed uses and their operational requirements in the Revised Scheme, assesses the degree to which specific uses and activities will have an impact on the heritage significance of heritage assets, and then considers the likely physical and visual impacts that may arise from the development in operation on those assets. The assessment of the impacts has taken into account the relevant statutory and policy provision

Methodology for Determining Impacts of the Outline Component of the Revised Scheme

- 16.5.6 This is the same as for the detailed components, with the difference in assessment outcome (i.e. the degree of uncertainty in the assessment of impact on heritage significance) considered to be minimal given the level of understanding of the outline component of the Revised Scheme available.

Limitations and Assumptions

16.5.7 The applications are to be submitted in outline with full details submitted for some parts of the Revised Scheme. The outline component of the Revised Scheme is assessed using parameter plans and an indicative masterplan in addition to detailed plans, elevations and other materials. Visual impact can be assessed on this basis however the information that accompanies an application to discharge reserved matters may provide a clearer understanding as to the impact of the Revised Scheme on heritage receptors.

Significance Criteria

16.5.8 The likely significance of any impact that the Revised Scheme may have on built heritage assets is a function of the sensitivity of the heritage asset and the magnitude of the change resulting from the Development as set out in **Table 16.2** below. This assessment takes into account the heritage significance of the particular heritage asset and the resultant impact of the Revised Scheme.

Table 16.2 Determining the Significance of Impact

Magnitude of Impact	Sensitivity to change		
	High	Medium	Low
Major	Major	Moderate	Minor
Moderate	Moderate	Minor	Negligible
Minor	Minor	Negligible	Negligible
Negligible	Negligible	Negligible	Negligible

16.5.9 Effects are also assessed qualitatively as beneficial, adverse, or neutral in respect of their effect on the heritage significance of the heritage asset. This is in recognition of the fact that an effect on a heritage asset or its setting can enhance its heritage significance (a beneficial effect), harm its heritage significance (an adverse effect) or leave its heritage significance unchanged (a neutral effect) and is independent of whether it is a major, moderate or minor change (a minor change may have a more beneficial effect than a major change, for example). This is in line with how decisions are made in relation to changes to heritage assets in the planning process as set out in the NPPF and described specifically in relation to elements of setting. It is in line with the statutory requirement to preserve or enhance the character and appearance of a conservation area (which would be a neutral or beneficial effect); or to preserve the special architectural and historic interest of a listed building (which would be a neutral effect).

16.5.10 It should be noted that the various planning policies and guidance relating to the historic built environment, described above, do not provide a definitive system of measurement of impacts upon heritage receptors. The matter of the impact of change upon built heritage assets is generally one of interpretation and professional judgement. There is also no system of measurement of the sensitivity of receptors to change and the magnitude of that change. As such, the following definitions have been used.

Sensitivity to change

16.5.11 The sensitivity of heritage assets identified during the assessment has been assessed as high, medium, low or negligible. There are no absolute measures to determine this sensitivity, and it should be acknowledged that the sensitivity is relative to the particular built heritage asset in question. As such, for this assessment, sensitivity has been viewed as a function of:

- the inherent importance of the built heritage asset as defined by available measures of its significance (such as a listing description for a listed building or a conservation area appraisal for a conservation area); and
- the location of the built heritage asset and its relationship to the site. This takes account of topography and landscape features.

16.5.12 Consequently, a built heritage asset that is characterised as being of high sensitivity would be, for example, a largely intact Grade I listed building in immediate proximity to the site. A heritage asset that is of low sensitivity would be, for example, a conservation area at a distance of over 500 metres from the site.

Magnitude of Impact

16.5.13 The magnitude of the impacts of the Revised Scheme on built heritage assets has been considered using the following criteria:

- Major:** Substantive change to or transformation of the fabric or setting of the built heritage asset in complete contrast to the existing situation;
- Moderate:** Moderate change to the fabric or setting of the built heritage asset that may be noticeable but does not necessarily result in transformation or a complete change in its circumstances;
- Minor:** A slight change to the fabric or setting of the built heritage asset that would not be easily noticed; and
- Negligible:** No change to fabric or setting of the built heritage asset.

Determining the significance of the Impacts

16.5.14 Having ascribed a level of sensitivity to each relevant built heritage asset and determined the magnitude of the potential impact upon the assets, the nature (or significance) of the impact on the built heritage assets has been measured as follows:

- Major beneficial:** Substantial improvement in the setting of or structural condition of a Grade I or II* listed building or World Heritage Site;
- Moderate beneficial:** Perceptible improvement in the setting of, or structural condition, of a Grade I / II* listed building. Major improvement in the setting of or structural condition of a Grade II or locally listed building or conservation area;
- Minor beneficial:** Perceptible improvement in the setting of, or structural condition, of a Grade II or locally listed building or conservation area;
- Negligible:** No perceptible change in the condition or setting of designated built heritage features or conservation areas;
- Minor adverse:** Slight change to the long-term setting or structure of a Grade II listed building or substantial change to a locally listed building. Demolition of an undesignated historic building. Limited encroachment upon a conservation area or slight impacts upon its integrity;
- Moderate adverse:** Land take resulting in the degradation of a cultural heritage site of regional importance and / or extensive long-term change to the setting or visual amenity of such a site. Extensive long-term change to the setting or structure of a Grade II listed building. Demolition of a locally listed building. Encroachment upon a conservation area, historic parkland or other historic landscapes where its character or the quality of the setting or its amenity would be noticeably impaired. Slight change to the long-term setting or structure of a Grade I / II* listed building; and
- Major adverse:** Land take resulting in the degradation of a cultural heritage site of national importance and / or extensive long-term change to the setting of such a site, e.g. intrusion into the setting of a Grade I or II* listed building. Destruction of sites of built heritage interest of regional value, or Grade II registered parks and gardens, e.g. a dramatic change in the setting or visual amenity of a regionally important site such as a conservation area. Adverse long-term impacts on the setting or structure of a Grade I / II* listed building. Demolition of any grade of statutorily listed building.

Direct and Indirect Impacts

16.5.15 Within this assessment chapter consideration is also given to direct and indirect impacts. Direct impacts are those categorised as any physical impacts upon the heritage asset including any demolition and construction works. Indirect impacts are categorised as impacts upon the element of setting that contribute to the heritage significance of the asset both onsite and in surrounding area.

Duration

16.5.16 The nature of an impact may be temporary or permanent, dependent on whether aspects of the proposals have an impact during demolition and construction (temporary) or once the Revised Scheme is complete and occupied (permanent).

16.6 BASELINE ASSESSMENT AND IDENTIFICATION OF KEY RECEPTORS

16.6.1 The baseline heritage conditions of the site and its context are set out in detail in Appendix A and Appendix B to the Heritage Statement (**ES Volume 4, Appendix K: Built Heritage**) and these documents should be referred to throughout the assessment. There are 2 listed structures on the site. There are five conservation areas in close proximity to the site which include South Shoreditch in LBH and Redchurch Street, Brick Lane and Fournier Street, Boundary Estate and Elder Street Conservation Areas (all in LBTH). There are 82 listed buildings in close proximity to the site; these have been grouped according to their street location and address. There is one Registered Landscape within the study area, the gardens at Arnold Circus, and the Tower of London World Heritage Site is located approximately 1.7km to the south. All of these Heritage Assets form part of the baseline conditions and consequent assessment.

16.7 IDENTIFICATION AND DESCRIPTION OF CHANGES LIKELY TO GENERATE EFFECT

16.7.1 The following elements of the Revised Scheme are likely to generate effects in respect of heritage receptors:

- Construction Phase: demolition and building operations will affect the fabric and setting of heritage assets within the site and the setting of heritage assets outside the site.
- Operational Phase: the design, scale, appearance, massing and bulk of new development on the site will affect the setting of heritage assets on and outside the site. Changes to the fabric of heritage assets on the site will have been completed during the construction phase and no other subsequent changes to the fabric of heritage assets are anticipated.

16.8 ASSESSMENT OF LIKELY SIGNIFICANT EFFECTS

16.8.1 This section considers the potential impact of the Revised Scheme on heritage assets on the site and in its surrounding context. This includes World Heritage Sites, listed buildings, conservation areas and locally listed buildings. This section also includes consideration of the setting of those assets.

16.8.2 This section should be read in conjunction with the Townscape Visual Impact Assessment (TVIA) (ES Addendum, Volume 3) and Heritage Statement (**ES Addendum, Volume 4, Appendix K: Built Heritage**).

16.8.3 The method of assessment for the detailed and outline components of the Revised Scheme do not differentiate in their approach. The following assessment of impacts and significance considers the Revised Scheme as a whole, however for the outline components of the Revised Scheme the heights and form of the buildings are set within the parameter plans and greater emphasis is placed upon the design guidelines within which strict guidelines on the outline components elevation appearance will be defined.

Construction Phase

Embedded Mitigation Measures

16.8.4 During the course of works, on site heritage structures will be protected, works to historic structures will be sensitively and appropriately handled and undertaken by appropriately qualified professionals. With regard to off-site heritage assets, no measures will be undertaken apart from good construction practice.

16.8.5 The structural and physical condition of both the grade II listed Braithwaite Viaduct and the grade II listed Forecourt Wall, Oriel and Gates to the Goods Station have been fully taken into account during the development of proposals for the listed structures. The proposals relating to each structure have also been developed through consulting structural engineers who have developed appropriate solutions for the demolition of adjacent structures and interventions to listed structure.

16.8.6 Demolition and construction around the listed structures on site will therefore be designed to respect the listed fabric and to remove the need for any harm to be caused to the listed structures.

Anticipated Effects

16.8.7 During the demolition and construction phase the proposed alterations to the listed structures on-site and the wider development proposals would have an increasingly greater beneficial impact as the Revised Scheme nears completion ranging from minor adverse when works commence proceeding to moderate beneficial as the works conclude for the following assets:

- The Braithwaite Viaduct – grade II; and
- The Forecourt Wall, Oriel and Gates to Goods Station – grade II.

16.8.8 During the demolition and construction phase the Revised Scheme would have a minor adverse impact on the following individual or groups of heritage assets. The effect would largely be caused by crane and other equipment falling into the backdrop or setting of heritage assets. In some cases, incomplete buildings would also be present in views of heritage assets. The impact of the Revised Scheme would increase as construction progresses and nears completion.

- Listed buildings on Bethnal Green Road;
- Listed buildings of the Boundary Estate;
- Commercial Street Centre;
- Commercial Street North and Quaker Street;
- Elder Street and Folgate Street;
- Great Eastern Street;
- Shoreditch High Street;
- South Shoreditch Conservation Area;
- Elder Street Conservation Area; and
- Boundary Estate Conservation Area.

16.8.9 During the demolition and construction phase, the Revised Scheme would have a negligible impact on the following individual or groups of heritage assets:

- The Tower of London World Heritage Site;
- The Truman Brewery Complex;
- No. 149 Brick Lane;
- Nos. 2-38 Cheshire Street;
- Redchurch Street;
- Worship Street;
- The Geffrye Museum;
- Redchurch Street Conservation Area;
- Brick Lane and Fournier Street Conservation Area; and
- Arnold Circus, the Boundary Estate.

Operational Phase - Embedded Mitigation Measures

16.8.10 The design of the Revised Scheme has been carefully undertaken to mitigate any harmful impact on nearby and more widely located heritage assets. Mitigation has been inherent in the design of the proposals and their relationship to heritage assets. Consultation has also been undertaken with Historic England in respect of the height of Plot 2. Consultation resulted in a review and revision of the height of Plot 2 and this have since been reduced to address Historic England’s concerns in relation to the Tower of London World Heritage Site.

Operational Phase - Anticipated Effects

16.8.11 The following paragraphs identify the significance of the impact of the Revised Scheme on the heritage significance of the relevant heritage assets once the Revised Scheme is complete and operational.

The Tower of London World Heritage Site

16.8.12 The Revised Scheme will not be visible in views of and from the WHS and does not form part of its wider setting therefore the Revised Scheme would not cause harm to the significance or Outstanding Universal Value of the WHS. (Following consultation with Historic England throughout the design evolution at pre- and post-application stage, the design of the Plot 2 (the only elements of the 2015 Proposed Development visible within the setting of the WHS) was reviewed and revised so as to remove the visual impact of the proposal on the setting of the WHS).

- High sensitivity;
- Negligible affect;
- The magnitude of indirect impact is negligible upon its setting; and
- The significance of impact is negligible.

Listed Buildings (On-site)

The Braithwaite Viaduct – Grade II

- 16.8.13
- The Braithwaite Viaduct, a building at risk, forms a key element of the Revised Scheme. It will be restored and reused along its full length and fully integrated into the wider scheme. Once complete, the Viaduct will be significantly enhanced through repair and reuse and fully integrated into the wider site, particularly with the park at upper level. Much of the Viaduct’s immediate historic setting to the south (a series of unlisted vaults and structures) would also be retained, repaired and reused.
- High sensitivity;
 - Permanent direct impact;
 - The magnitude of direct impact is moderate; and
 - The significance of effect is moderate beneficial.

The Forecourt Wall, Oriel and Gates to Goods Station – grade II

- 16.8.14
- This structure, a building at risk, will be fully repaired and integrated into the wider scheme as part of the Revised Scheme. It will be actively used and form one of the key access points into the site, in line with its historic purpose. Therefore, it will be significantly enhanced once works are complete.
- High sensitivity;
 - Permanent direct impact;
 - The magnitude of direct impact is moderate; and
 - The significance of effect is moderate beneficial.

Listed Buildings (Off-site)

Bethnal Green Road

- 16.8.15
- The listed buildings of Bethnal Green Road include nos. 123-159 (grade II) and no. 25, the Knave of Clubs Public House (grade II). The former is an example of a mid-19th century terrace of housing with shops and a public house at its centre. The latter is a late 19th century purpose built pub. The buildings will not be directly affected by any aspects of the proposals but the Revised Scheme will appear in longer views to the west when complete. This would not harm the significance of the buildings, which exist in an urban environment with modern development already forming part of their context, or an appreciation of their special interest, but would have a slight change in the long term setting.
- Medium sensitivity;
 - Permanent indirect impact;
 - The magnitude of the indirect impact would be minor; and
 - The significance of the impact is minor adverse.

The Boundary Estate

- 16.8.16
- The Boundary Estate is formed of a collection of twenty listed blocks with additional listed structures. All listed buildings and structures within the estate are listed at grade II. The Revised Scheme will be visible to the south of the estate in views from Arnold Circus along Club Row and Camlet Street; this is most evident in winter views. The buildings will not be directly affected by any aspects of the proposals but the Revised Scheme will appear in longer views away from the heritage assets to the south when complete. This would not harm the significance of the buildings, which exist in an urban environment with modern development already forming part of their context, or an appreciation of their special interest.
- Medium sensitivity;
 - Permanent indirect impact;
 - The magnitude of impact would be minor; and
 - The significance of the impact is minor adverse.

The Truman Brewery

- 16.8.17
- There are five listed buildings that make up the collection of brewery buildings at the centre of Brick Lane. All are listed at grade II with the exception of the Brewmaster’s House which is listed at grade II*. Given the position of the buildings within the townscape and the existing street pattern, the vast majority of the site is not visible from outside this group of buildings. Only distant views of the Brick Lane end of the site are possible and therefore the significance of this group and its setting would not be impacted on the Revised Scheme once complete.
- Medium sensitivity;
 - Permanent indirect impact;

- The magnitude of the indirect impact would be minor its setting; and
- The significance of impact is negligible.

No. 149 Brick Lane

- 16.8.18
- This is a small grade II listed building at the northern end of Brick Lane. The building forms part of a modest townscape which is mixed in building age and quality. Given the location of the building on the northern part of Brick Lane, the existing street pattern and the relationship between the building and the site, the significance of the building and its setting would not be affected once the Revised Scheme was complete.
- Low sensitivity;
 - Permanent indirect impact;
 - The magnitude of impact would be negligible; and
 - The significance of impact is negligible.

Nos. 2-38 Cheshire Street

- 16.8.19
- This grade II listed terrace is located on the south side of Cheshire Street which runs perpendicular to Brick Lane. The buildings address Cheshire Street although there are views past the buildings to Brick Lane. The Revised Scheme would be visible in oblique views along Cheshire Street and therefore would be visible in narrow views away from the listed buildings once complete, causing a slight change to the setting. This would not harm the significance of the buildings or an appreciation of their value and special interest.
- Low sensitivity;
 - Permanent indirect impact;
 - The magnitude of the impact would be minor; and
 - The significance of the impact is negligible.

Commercial Street Centre

- 16.8.20
- The listed buildings in this group are focussed around the grade I listed Christ Church and the grade II listed Central North Block of Spitalfields Market. The Revised Scheme would be visible in views to the north away from the group and would therefore be visible once complete. While the Revised Scheme would appear in the background to the north, it would not harm the legibility or appreciation of the listed buildings’ special interest, significance or setting. Modern, larger scale buildings also form part of the listed buildings’ setting, predominantly to the west, and the Revised Scheme will positively contribute to that wider character.
- Medium sensitivity;
 - Permanent indirect impact;
 - The magnitude of the impact would be moderate; and
 - The significance of the impact is minor beneficial.

Commercial Street North and Quaker Street

- 16.8.21
- The group of listed buildings in the northern section of Commercial Street includes four grade II listed buildings and a further grade II listed building, Bedford House, on Quaker Street. The former group relates to the laying out of Commercial Street and date principally to the 1860s. Commercial Street, and its setting, is urban in character and appearance. Bedford House is situated close to Braithwaite Street and is therefore in close proximity to the site. The northern end of Commercial Street and Quaker Street generally has a relatively poor quality built environment with a run-down feel exacerbated by the ruinous and redundant site. Once complete, the Revised Scheme as a whole will significantly enhance the setting of the nearby listed buildings.
- Medium sensitivity;
 - Permanent indirect impact;
 - The magnitude of the impact would be moderate; and
 - The significance of the impact is minor beneficial.

Elder Street and Folgate Street

- 16.8.22 There are 13 listed buildings, 4 sets of listed railings, 2 listed bollards and a listed street lamp on Elder Street. There are 10 listed buildings and a listed street lamp on Folgate Street. The site is located to the north of Elder Street and Folgate Street to the north of Commercial Street and the railway cutting. It therefore forms part of the wider setting of the Elder Street/Folgate Street listed buildings and structures/features. Elder Street forms a north-south axis which has the proposed site at its northern end. Folgate street runs east-west with views towards 201 Bishopsgate in the west and Commercial Street and beyond to the east. Existing views along both Elder Street and Folgate Street give something of an illustration of part of the setting of the 18th century buildings of both streets which includes both buildings of historic and architectural interest and of lower and higher scale and height. The setting is often characterised by the juxtaposition of new and old and higher and lower scale.
- 16.8.23 However, the setting of the listed buildings on either street is not defined by these limited and narrow views but by a number of features and characteristics. These include nearby 18th century architecture, the Victorian and Edwardian warehouses along Blossom Street, the buildings of Norton Folgate, Quaker Street and Commercial Street and the street surfaces of Elder Street and Fleur de Lis Street. There are links to 18th century buildings such as the Sclater Street weavers' cottages and to buildings on Brick Lane. The setting of the Elder Street and Folgate Street buildings and features is broader than north-south or east-west views would allow. It also includes such townscape features as the railway cutting to the north and also the existing Goodsyard (including the two on-site listed buildings). If the taller elements of the proposed site are considered to fall within the setting of the Elder Street/Folgate Street listed buildings so to must the historic structures that form part of the site.
- 16.8.24 View 49 of the TVIA shows one element of the existing and proposed setting of the Elder Street and Norton Folgate listed buildings/features. The proposed view shows a uplift in height and scale between the existing Elder Street buildings and plots 1 and 2. Plot 3 mediates the transition in scale in this view. It appears in the middle ground and acts as a transition between the Elder Street buildings and the taller elements of the Revised Scheme behind. The Revised Scheme as show in view 49 would not affect the setting of the majority of listed buildings on Folgate Street given its east-west orientation and relatively narrow street width.
- 16.8.25 While the view northward is important in appreciating the run of listed buildings along Elder Street and its special interest and significance, it is not the only view, feature, building or group(s) of buildings that form part of the wider setting of the listed buildings or that best reveals their special interest or significance.
- 16.8.26 The existing site is currently run-down and does not make a positive contribution to the existing setting of the listed buildings either in the individual view or in terms of the listed buildings' actual broader setting. Plots 1, 2 and 3 would be visible in views immediately north along Elder Street in place of the Bishopsgate Goods Yard boundary wall and the concrete box of the East London Line beyond. Modern, larger-scale buildings already form part of the listed buildings' wider setting and are a clear characteristic of the local area given its area on the city fringe. The well-modelled and designed buildings would improve upon the existing setting of the relevant listed buildings in this view and the wide Revised Scheme site does of course involve the significant enhancement of listed and unlisted historic structures
- 16.8.27 In being a prominent feature in an obvious juxtaposition of new and old and lesser and greater height, the relevant elements of the Revised Scheme could be perceived as causing less than substantial harm to the setting of the listed buildings on Elder Street (and Folgate Street where relevant). It is considered that there are significant enhancements of heritage assets and genuine heritage benefits of the Revised Scheme that outweigh this level of less than substantial harm. Further, this harm has to then be weighed against the wider public benefits of the scheme which are considerable
- Medium sensitivity;
 - Permanent indirect impact;
 - The magnitude of the impact would be moderate; and
 - The significance of the impact is minor adverse.

Great Eastern Street

- 16.8.28 Great Eastern Street is now characterised by a mixed built environment with buildings of varying age and quality. There are four grade II listed buildings on Great Eastern Street at various points along its length. The Revised Scheme would be visible within the setting of listed buildings once the works were complete. The visibility of the Revised Scheme varies according to the position within the street; it is at its most prominent close to the grade II listed nos. 6-8 Great Eastern Street and nos. 11-15 Great Eastern Street and would form part of the immediate backdrop to both buildings. The buildings already form part of a very urban context and their significance would not be harmed once the Revised Scheme was complete. The Revised Scheme overall would enhance the setting of the buildings with the high-quality development of a redundant and deteriorating site.
- Medium sensitivity;
 - Permanent indirect impact;
 - The magnitude of the impact would be moderate; and
 - The significance of the impact is minor beneficial.

Redchurch Street

- 16.8.29 There are two grade II listed buildings on Redchurch Street. No.34 Redchurch Street is experienced from within Redchurch Street only and while there are views to the east and west, the site is not visible from the listed building given the location of the building on the street and the narrowness of the street. It would therefore not be visually affected once the Revised Scheme was complete.
- Low sensitivity;
 - Neutral impact;
 - The magnitude of the impact would be negligible; and
 - The significance of the impact is negligible.
- 16.8.30 No. 113 Redchurch Street is located close to the junction with Bethnal Green Road but it is separated from the site by modern development on the south side of Bethnal Green Road and Sclater Street. It would be largely unaffected by the Revised Scheme once complete although its wider setting would be enhanced through the development of the site.
- Low sensitivity;
 - Permanent indirect impact;
 - The magnitude of the impact would be negligible; and
 - The significance of the impact is negligible.

Shoreditch High Street

- 16.8.31 There are nine listed buildings on Shoreditch High Street which include the grade I listed Church of St Leonards. Once complete the Revised Scheme would not cause harm to the church's significance or special interest and the building would remain a local landmark of importance. The Revised Scheme would be visible in views to the south but modern developments already form part of the context of the church and its associated buildings as derived from its city fringe location. The church and its significance would continue to be understood and appreciated as before.
- Medium sensitivity;
 - Permanent indirect impact;
 - The magnitude of the impact would be moderate; and
 - The significance of the impact is minor beneficial.
- 16.8.32 The listed buildings at the southern end of Shoreditch High Street, nos. 182, 187-189, 191 and 196, are located in closer proximity to the site. These buildings are slightly cut off from the site by the rail bridge of the London Overground which passes by no. 196 Shoreditch High Street and has a significant impact on the building and its setting. The listed buildings already form part of a very urban environment with modern and larger-scale buildings (permitted and constructed) to the south and west. Once complete the Revised Scheme will enhance the east side of Shoreditch High Street through a high quality development that will see the repair of a redundant listed structure, in a poor condition, and will therefore enhance the setting of the listed buildings.
- Medium sensitivity;
 - Permanent indirect impact;
 - The magnitude of the impact would be moderate; and
 - The significance of the impact is minor beneficial.

Worship Street

- 16.8.33 There are two groups of listed buildings at the eastern end of the Worship Street which includes nos. 91-101 and nos. 103-105. The site is located to the north-east of Worship Street and the taller elements would be visible in views beyond the buildings once complete. However, other nearby permitted development would appear immediately beyond the listed buildings with only an element of the Revised Scheme in the background.
- Low sensitivity;
 - Permanent indirect impact;
 - The magnitude of the impact would be minor; and
 - The significance of the impact is negligible.

The Geffrye Museum

- 16.8.34 The Geffrye Museum is located far to the north of site on the eastern side of Kingsland Road. The main building is grade I listed, a niche within the forecourt is listed at grade II*. The Revised Scheme would be visible from within the forecourt of the complex, which has substantial tree cover in summer and winter, in very distant views once complete. The distance between the site and the Geffrye Museum (approximately 1km) means that the Revised Scheme would not harm the significance of the site.

- Medium sensitivity;
- Permanent indirect impact;
- The magnitude of the impact would be minor; and
- The significance of the impact is negligible.

Conservation Areas

South Shoreditch Conservation Area

16.8.35 The Revised Scheme would be visible once complete from a number of points within the conservation area. It would be most visible along the main routes through the area that tend to lead to the site. This includes views from Great Eastern Street and Shoreditch High Street. The Revised Scheme would improve the currently relationship between the site and the conservation area. The repair of the sites’ listed structures and improved permeability with the area would enhance the conservation area’s setting. Modern, larger-scale developments have been permitted elsewhere within the conservation area and its setting and it is considered that such a juxtaposition now forms part of the character and appearance of the conservation area and its setting.

- Medium sensitivity;
- Permanent indirect impact;
- The magnitude of the impact would be moderate; and
- The significance of the impact is minor beneficial.

The Boundary Estate Conservation Area

16.8.36 The Revised Scheme would be visible once complete to the south of the conservation area. Only views south out of the conservation area would be affected, such as those along Camlet Street and Club Row. The Boundary Estate is a very cohesive conservation area with consistency in architectural approach and character. This helps to create a sense of a robust enclave which adds to its significance and character. Although visible, the Revised Scheme would not hinder an appreciation of the areas’ quality and significance. The Revised Scheme would be barely visible in summer views given the extent of tree coverage within the conservation area.

- Medium sensitivity;
- Permanent indirect impact;
- The magnitude of the impact would be moderate; and
- The significance of the impact is minor adverse.

The Redchurch Street Conservation Area

16.8.37 The Redchurch Street Conservation Area is situated to the north of the site. It is a tightly grained network of streets running predominantly on an east-west axis. This means that once complete there would only be a limited effect on its significance. Chance Street runs north-south through the conservation area and leads to the site on the southern edge of Bethnal Green Road. The Revised Scheme would therefore be visible from limited points within the conservation area once complete.

- Medium sensitivity;
- Permanent indirect impact;
- The magnitude of the impact would be minor; and
- The significance of the impact is negligible.

Brick Lane and Fournier Street Conservation Area

16.8.38 Brick Lane and Fournier Street Conservation Area covers a large area but due to the pattern of its streets and the form of its development, there are limited areas where the Revised Scheme would affect the conservation area once complete. This includes Commercial Street and Quaker Street and areas of Brick Lane and Cheshire Street (see 16.76 - 16.80 above). The Revised Scheme would therefore be visible once complete from limited parts of the conservation area. The Revised Scheme has a direct impact on the former Mission Chapel and Weaver’s Cottages as part of the scheme. These buildings, currently in a poor state of repair, will be fully repaired and integrated into the wider site, thus significantly enhancing the buildings and this part of the conservation area. The Revised Scheme would also significantly enhance the built environment of the Commercial Street (north) and Quaker Street.

- Medium sensitivity;
- Permanent direct and indirect impact;
- The magnitude of the impact would be moderate; and
- The significance of the effect is moderate beneficial.

The Elder Street Conservation Area.

16.8.39 The Elder Street Conservation Area is almost a continuation of the Brick Lane and Fournier Street Conservation Area in terms of its character and appearance. It is located in close proximity to the site which is located northwards of the conservation area, to the north of Commercial Street and the broad railway cutting. Elements of the Revised Scheme would be visible from Elder Street once complete in views northwards out of the conservation area along Blossom Street and Elder Street. Modern, larger-scale buildings already form part of the listed buildings’ wider setting and are a clear characteristic of the local area. The significance of the conservation area would not be harmed by the Revised Scheme once complete and a new high quality built environment with repaired and accessible heritage assets would enhance its wider setting.

- Medium sensitivity;
- Permanent indirect impact;
- The magnitude of the impact would be moderate;
- The significance of the impact is minor adverse.

Registered Park or Garden of Special Historic Interest

Arnold Circus, The Boundary Estate

16.8.40 The central garden to Arnold Circus is an integral part of the Boundary Estate and to the setting of a number of listed buildings. Its significance is derived from its historic development and use and relationship with the surrounding streets and blocks that make up the estate. While the Revised Scheme would be visible in views away from the garden particularly in wintertime once complete, the overall significance of the garden would not be harmed.

- Medium sensitivity;
- Temporary indirect impact;
- The magnitude of the impact would be minor; and
- The significance of the impact is negligible.

Anticipated Effects of Applying the Minimum Development Parameter

16.8.41 The assessment has been based on the maximum parameters for the outline parts of the development as these present the worst-case scenario with regards to likely significant effects. However, in order to provide a complete assessment, the minimum parameters for the outline plots were also qualitatively assessed using professional judgement. The difference between the residual impacts of the maximum parameters and those of the minimum parameters on the heritage assets are as follows.

16.8.42 Minimum parameters for the outline component of the development would result in slight reductions in massing to the proposed buildings on Plots 1,3, 4, 5, 8 and 10 with consequently marginally reducing the visual impacts upon the surrounding conservation areas. However, these small changes will result in no change to the residual impacts identified. Additionally, the changes in massing will not result in any change to the identified residual impacts upon the surrounding listed buildings and the listed buildings on site.

16.8.43 Overall it is considered that the difference in the minimum and maximum parameters will not present a significant difference in residual impact and that overall reducing the development extent to the minimum parameters will present a negligible difference in comparison to the maximum parameters.

16.9 SCOPE FOR ADDITIONAL MITIGATION MEASURES

16.9.1 The design of the Revised Scheme is carefully considered to minimise harmful impacts upon the heritage assets. Therefore, mitigation is considered to be embedded within the design, consequently there is considered to be no scope for additional mitigation measures.

16.10 RESIDUAL EFFECTS

16.10.1 **Table 16.3** provides a summary of the residual effects resulting from the Revised Scheme after effective implementation of the embedded mitigation measures.

Table 16.3 Summary of Residual Effects

Phase	Resource or Receptor Affected	Residual Effect
Construction	World Heritage Site	
	Tower of London	Negligible
	Conservation Area	
	South Shoreditch	Minor adverse
	Boundary Estate	Minor adverse
	Redchurch Street	Negligible
	Brick Lane and Fournier Street	Negligible
	Elder Street	Minor adverse
	Listed Buildings	
	Braithwaite Viaduct	Minor adverse
	The Forecourt Wall, Oriel and Gates to the Goods Station	Minor adverse
	Bethnal Green Road	Minor adverse
	The Boundary Estate	Minor adverse
	The Truman Brewery	Negligible
	No. 149 Brick Lane	Negligible
	Nos. 2-38 Cheshire Street	Negligible
	Commercial Street Centre	Minor adverse
	Commercial Street North and Quaker Street	Minor adverse
	Elder Street and Folgate Street	Minor adverse
	Great Eastern Street	Minor adverse
	Redchurch Street	Negligible
	Shoreditch High Street	Minor adverse
	Worship Street	Negligible
	The Geffrye Museum	Negligible
	Registered Parks or Gardens of Special Historic Interest	
	Arnold Circus garden	Negligible

Phase	Resource or Receptor Affected	Residual Effect
Operation	World Heritage Site	
	Tower of London	Negligible
	Conservation area	
	South Shoreditch	Minor beneficial
	Boundary Estate	Minor adverse
	Redchurch Street	Negligible
	Brick Lane and Fournier Street	Moderate beneficial
	Elder Street	Minor adverse
	Listed buildings	
	Braithwaite Viaduct	Moderate beneficial
	The Forecourt Wall, Oriel and Gates to the Goods Station	Moderate beneficial
	Bethnal Green Road	Minor adverse
	The Boundary Estate	Minor adverse
	The Truman Brewery	Negligible
	No. 149 Brick Lane	Negligible
	Nos. 2-38 Cheshire Street	Negligible
	Commercial Street Centre	Minor beneficial
	Commercial Street North and Quaker Street	Minor beneficial
	Elder Street and Folgate Street	Minor adverse
	Great Eastern Street	Minor beneficial
	Redchurch Street	Negligible
	Shoreditch High Street	Minor beneficial
	Worship Street	Negligible
	The Geffrye Museum	Negligible
	Registered Parks or Gardens of Special Historic Interest	
	Arnold Circus garden	Negligible

16.11 CUMULATIVE EFFECTS

- 16.11.1 Cumulative effects are the combined effects of several development schemes (in conjunction with the Revised Scheme) which may, on an individual basis be insignificant but, cumulatively, have a significant effect.
- 16.11.2 The ES Addendum has given consideration to 'Cumulative 'Effects' for schemes located within (1) km radius from the boundary of the Site. Significant cumulative effects on heritage assets will be confined to effect on the setting of heritage assets only as a component of their heritage significance, and that effect is inherently reduced by virtue of greater distance from the site and the Revised Scheme. However, the assessment allows for tall development at some distance from the site to nonetheless have a significant effect. It should be emphasised that the visibility of new development in the setting of heritage assets is not, of itself, harmful.

Table 16.4 Cumulative effects

Map Reference	Scheme Name and Reference Number	Status	Residual Cumulative Impact
1 (LBTH)	Land within former Truman's Brewery site, (LPA Ref. PA/12/00090)	Application permitted (12 April 2012). Permission has lapsed without implementation.	Negligible
2 (LBTH)	London Fruit Exchange Brushfield Street And Multi Storey Car Park Whites Row, Brushfield Street, London (LPA ref: PA/16/03266)	Application permitted (11 October 2017)	Negligible
3 (LBH)	Art Otel - east of Old Street roundabout at the junction of Old Street, Rivington Street and Great Eastern Street. (LPA Ref: 2009/2405)	Granted (7 January 2011)	Negligible
4 (LBTH)	Black Lion House, 45 Whitechapel Road (LPA Ref. PA/13/02162)	Application permitted (26 November 2013)	Negligible
5 (LBTH)	Aldgate Place (LPA Ref. PA/13/00218)	Application permitted (18 October 2013)	Minor adverse
6 (CoL)	Bevis Marks House, 24 Bevis Marks (LPA Ref: 14/00433/FULMAJ)	Application validated (17 July 2014)	Negligible
7 (LBTH)	Fakruddin Street and Pedley Street (LPA Ref. PA/12/02228)	Application permitted (13 December 2012)	Negligible
8 (LBTH)	11-31 Toynbee Street and 67-69 Commercial Street, London (LPA Ref: PA/16/02878/A1)	Application permitted (18 October 2017)	Negligible
9 (LBTH)	Site At 3-11 Goulston Street And 4-6 And 16-22 Middlesex Street (LPA Ref: PA/18/01544)	Decision pending	Minor adverse
10 (LBTH)	Enterprise House, 21 Buckle Street, London, E1 8NN (PA/16/03552).	Granted Planning Permission at appeal 17 December 2018.	Negligible
11 (LBTH)	Site at 2-6 Commercial Street, 98 and 101-105 Whitechapel High Street, carpark to the rear of 95-97 Whitechapel High Street (known as Spread Eagle Yard) and Canon Barnett Primary School (LPA Ref: PA/18/02615/A1)	Registered	Minor adverse

Map Reference	Scheme Name and Reference Number	Status	Residual Cumulative Impact
39 (LBTH)	Land bounded by 2-10 Bethnal Green road, 1-5 Chance Street (Huntingdon Industrial Estate) and 28-32 Redchurch Street (PA/19/00294)	Not yet submitted. EIA Scoping Opinion issued 7 March 2019.	Negligible
13 (LBH)	Principal Tower (Principal Place / Bishops Place) (LPA Ref: 2016/2044)	Under Construction	Moderate adverse
14 (LBH)	The Stage (Plough Yard) (LPA Ref: 2015/3453)	Under Construction or Complete & Unsold	Moderate adverse
15 (LBH)	5-29 Sun Street 8-16 Earl Street & 54 Wilson Street (LPA Ref: 2015/0877)	Under Construction or Complete & Unsold	Minor adverse
16 (LBTH)	120 Vallance Road 2-4 Hemming Street (LPA Ref: PA/15/01231)	Under Construction or Complete & Unsold	Negligible
17 (LBH)	201-207 Shoreditch High Street (LPA Ref: 2015/2403)	Permission Granted	Moderate adverse
18 (LBH)	13-14 Appold Street (LPA Ref: 2015/1685)	Permission Granted – Not Started	Minor adverse
19 (LBH)	84-86 Great Eastern Street (LPA Ref: 2015/1834)	Permission Granted – Not Started	Negligible
20 (LBH)	1-13 Long Street (LPA Ref: 2012/2013)	Under Construction	Negligible
21 (LBTH)	114-150 Hackney Road (LPA Ref: PA/17/00250)	Permission Granted – Not started	Negligible
22 (CoL)	100 Liverpool Street & 8 - 12 Broadgate (LPA Ref: 15/01387/FULEIA)	Under Construction	Negligible
23 (LBH)	97-137 Hackney Road (LPA Ref: 2015/3455)	Under Construction	Negligible
24 (LBTH)	Land Adjacent to 20 Bury Street ('The Tulip'), (LPA Ref: 18/01213/FULEIA).	Decision pending.	Negligible
25 (LBI)	Speedfix House and Monmouth House, 19 – 23 Featherstone Street (LPA Ref: P2015/3136/FUL)	Permission Granted – Not Started	Negligible
26 (CoL)	150 Bishopsgate (LPA Ref 17/00623/FULL)	Granted	Negligible
27 (CoL)	(100 Bishopsgate) 61 St Mary Axe, 80-86 Bishopsgate, 88-90 Bishopsgate, 12-20 Camomile Street, 15-16 St Helen's Place And 33-35 St Mary Axe (North Elevation Only) (LPA Ref: 12/00129/FULL)	Granted	Negligible
28 (LBTH)	Silwex House, Quaker street (LPA Ref: PA/16/00392/A1)	Granted 2016	Negligible
29 (LBH)	Shoreditch Village (183-187 Shoreditch High Street, bounded by Holywell Lane, New Inn Yard and rail viaduct) (LPA Ref: 2017/0596)	Granted 2018	Negligible

Map Reference	Scheme Name and Reference Number	Status	Residual Cumulative Impact
30 (LBH)	168-178 Shoreditch High Street (LPA Ref: 2015/3316)	Granted 2016	Negligible
31 (LBTH)	281-285 Bethnal Green Road, (LPA Ref: PA/17/00299/A1).	Granted (16 June 2017).	Negligible
32 (LBTH)	Land bounded by Elder Street, Folgate Street, Blossom Street, Norton Folgate, Shoreditch High Street and Commercial Street, (LPA Ref: PA/14/03548).	Granted (3 May 2016).	Negligible
33 (CoL)	2-3 Finsbury Avenue London EC2M 2PA, (16/00149/FULEIA)	Granted (29 March 2018) Not Started	Minor adverse
34 (LBTH)	Former Beagle House now known as Maersk House, Braham Street, (LPA Ref: PA/18/00971).	Granted (29 March 2019).	Negligible
35 (LBH)	49-51 Paul Street, (LPA Ref: 2018/2104).	Decision pending.	Negligible
36 (LBH)	Development House, 56-64 Leonard Street, (LPA Ref: 2017/4694).	Decision pending.	Negligible

16.11.3 In summary, the cumulative effects of the Revised Scheme will be greatest within and in the immediate vicinity of the site. Of the 36 cumulative schemes assessed, the residual cumulative effects is assessed as Negligible in respect of 27 developments, Minor Adverse in respect of 6 developments and Moderate Adverse in respect of 3 developments. These 3 developments are of considerable height and closest to the site.

16.12 QUALITATIVE COMPARISON OF THE 2015 PROPOSED DEVELOPMENT WITH THE 2019 REVISED SCHEME

16.12.1 **Table 16.5** outlines the comparison of residual effects between the 2015 Proposed Development and the 2019 Revised Scheme.

Table 16.5 Comparison of Residual effects between the 2015 Proposed Development and the 2019 Revised Scheme

Phase	Resource or Receptor Affected	Residual Effect (2015 Proposed Development)	Residual Effect (2019 Revised Scheme)
Construction	World Heritage Site		
	Tower of London	Minor adverse	Negligible
	Conservation Area		
	South Shoreditch	Minor adverse	Minor adverse
	Boundary Estate	Minor adverse	Minor adverse
	Redchurch Street	Negligible	Negligible
	Brick Lane and Fournier Street	Negligible	Negligible
	Elder Street	Minor adverse	Minor adverse

Phase	Resource or Receptor Affected	Residual Effect (2015 Proposed Development)	Residual Effect (2019 Revised Scheme)
	Listed Buildings		
	Braithwaite Viaduct	Minor adverse	Minor adverse
	The Forecourt Wall, Oriel and Gates to the Goods Station	Minor adverse	Minor adverse
	Bethnal Green Road	Minor adverse	Minor adverse
	The Boundary Estate	Minor adverse	Minor adverse
	The Truman Brewery	Negligible	Negligible
	No. 149 Brick Lane	Negligible	Negligible
	Nos. 2-38 Cheshire Street	Negligible	Negligible
	Commercial Street Centre	Minor adverse	Minor adverse
	Commercial Street North and Quaker Street	Minor adverse	Minor adverse
	Elder Street and Folgate Street	Minor adverse	Minor adverse
	Great Eastern Street	Minor adverse	Minor adverse
	Redchurch Street	Negligible	Negligible
	Shoreditch High Street	Minor adverse	Minor adverse
	Worship Street	Negligible	Negligible
	The Geffrye Museum	Negligible	Negligible
	Registered Parks or Gardens of Special Historic Interest		
	Arnold Circus garden	Negligible	Negligible
Operation	World Heritage Site		
	Tower of London	Negligible	Negligible
	Conservation area		
	South Shoreditch	Minor beneficial	Minor beneficial
	Boundary Estate	Minor adverse	Minor adverse
	Redchurch Street	Negligible	Negligible
	Brick Lane and Fournier Street	Moderate beneficial	Moderate beneficial

Phase	Resource or Receptor Affected	Residual Effect (2015 Proposed Development)	Residual Effect (2019 Revised Scheme)
	Elder Street	Minor adverse	Minor adverse
	Listed buildings		
	Braithwaite Viaduct	Moderate beneficial	Moderate beneficial
	The Forecourt Wall, Oriel and Gates to the Goods Station	Moderate beneficial	Moderate beneficial
	Bethnal Green Road	Minor adverse	Minor adverse
	The Boundary Estate	Minor adverse	Minor adverse
	The Truman Brewery	Negligible	Negligible
	No. 149 Brick Lane	Negligible	Negligible
	Nos. 2-38 Cheshire Street	Negligible	Negligible
	Commercial Street Centre	Minor beneficial	Minor beneficial
	Commercial Street North and Quaker Street	Minor beneficial	Minor beneficial
	Elder Street and Folgate Street	Minor adverse	Minor adverse
	Great Eastern Street	Minor beneficial	Minor beneficial
	Redchurch Street	Negligible	Negligible
	Shoreditch High Street	Minor beneficial	Minor beneficial
	Worship Street	Negligible	Negligible
	The Geffrye Museum	Negligible	Negligible

Phase	Resource or Receptor Affected	Residual Effect (2015 Proposed Development)	Residual Effect (2019 Revised Scheme)
	Registered Parks or Gardens of Special Historic Interest		
	Arnold Circus garden	Negligible	Negligible

16.13 SUMMARY AND CONCLUSION

Summary of baseline

- 16.13.1 There are five conservation areas in close proximity to the site which include South Shoreditch in LBH and Redchurch Street, Brick Lane and Fournier Street, Boundary Estate and Elder Street Conservation Areas (all in LBTH). There are 2 listed structures on the site. There are 82 listed buildings in close proximity to the site. There is one Registered Landscape within the study area, the gardens at Arnold Circus, and the Tower of London World Heritage Site is located approximately 1.7km to the south. All of these Heritage Assets form part of the baseline conditions and consequent assessment.

Summary of the methodology and consultation

- 16.13.2 A systematic data search for heritage assets or receptors in the vicinity of the site that may be affected by the Revised Scheme was undertaken, along with detailed inspection of the site and its surroundings and a thorough examination of the design of the Revised Scheme. Consultation was undertaken with the London Boroughs of Hackney and Tower Hamlets, Historic England and the GLA.

Summary of effects including cumulative

- 16.13.3 The impacts of the Revised Scheme on heritage assets are summarised in **Tables 16.3, 16.4** and **16.6**. The significance of residual effects ranges from Negligible to Minor Beneficial. The significance of cumulative effects ranges from Negligible to Moderate Adverse.

Summary of mitigation and residual effects

- 16.13.4 The design of the Revised Scheme is carefully considered to minimise harmful impacts upon the heritage assets. Therefore, mitigation is considered to be embedded within the design, consequently there is considered to be no scope for additional mitigation measures.
- 16.13.5 **Table 16.6** summarises the Built Heritage effects resulting from the Revised Scheme.

Table 16.6 Summary of the Built Heritage effects resulting from the Revised Scheme

Receptor/ Affected Group	Value or Sensitivity (Significance) of Receptor	Embedded Design Mitigation	Magnitude/ Spatial Extent/ Duration/ Likelihood of Occurrence	Significance of effect	Additional Mitigation	Residual Magnitude of Impact	Significance of Residual effect
World Heritage Site							
Tower of London	High	Yes	Negligible/Indirect/Temporary/Likely	Negligible	n/a	Negligible	Negligible
Conservation Areas							
South Shoreditch	Medium	n/a	Minor/Indirect/Temporary/Likely	Minor adverse	n/a	Minor adverse	Minor adverse
Boundary Estate	Medium	n/a	Minor/Indirect/Temporary/Likely	Minor adverse	n/a	Minor adverse	Minor adverse
Redchurch Street	Medium	n/a	Minor/Indirect/Temporary/Likely	Negligible	n/a	Negligible	Negligible
Brick Lane and Fournier Street	Medium	n/a	Minor/Indirect/Temporary/Likely	Negligible	n/a	Negligible	Negligible
Elder Street	Medium	n/a	Minor/Indirect/Temporary/Likely	Minor adverse	n/a	Minor adverse	Minor adverse
Listed buildings							
Braithwaite Viaduct	High	n/a	Moderate/Indirect/Temporary/Likely	Minor adverse	n/a	Minor adverse	Minor adverse
The Forecourt Wall, Oriel and Gates to the Goods Station	High	n/a	Moderate/Indirect/Temporary/Likely	Minor adverse	n/a	Minor adverse	Minor adverse
Bethnal Green Road	Medium	n/a	Minor/Indirect/Temporary/Likely	Minor adverse	n/a	Minor adverse	Minor adverse
The Boundary Estate	Medium	n/a	Minor/Indirect/Temporary/Likely	Minor adverse	n/a	Minor adverse	Minor adverse
The Truman Brewery	Medium	n/a	Negligible/Indirect/Temporary/Likely	Negligible	n/a	Negligible	Negligible
No. 149 Brick Lane	Medium	n/a	Negligible/Indirect/Temporary/Likely	Negligible	n/a	Negligible	Negligible
Nos. 2-38 Cheshire Street	Medium	n/a	Negligible/Indirect/Temporary/Likely	Negligible	n/a	Negligible	Negligible
Commercial Street Centre	Medium	n/a	Minor/Indirect/Temporary/Likely	Minor	n/a	Minor adverse	Minor adverse
Commercial Street North and Quaker Street	Medium	n/a	Minor/Indirect/Temporary/Likely	Minor	n/a	Minor adverse	Minor adverse
Elder Street and Folgate Street	Medium	n/a	Minor/Indirect/Temporary/Likely	Minor adverse	n/a	Minor adverse	Minor adverse
Great Eastern Street	Medium	n/a	Minor/Indirect/Temporary/Likely	Minor adverse	n/a	Minor adverse	Minor adverse
Redchurch Street	Low	n/a	Negligible/Indirect/Temporary/Likely	Negligible	n/a	Negligible	Negligible
Shoreditch High Street	Medium	n/a	Minor/Indirect/Temporary/Likely	Minor adverse	n/a	Minor adverse	Minor adverse
Worship Street	Low	n/a	Negligible/Indirect/Temporary/Likely	Negligible	n/a	Negligible	Negligible
The Geffrye Museum	Low	n/a	Negligible/Indirect/Temporary/Likely	Negligible	n/a	Negligible	Negligible
Registered Parks or Gardens							
Arnold Circus	Medium	n/a	Negligible/Indirect/Temporary/Likely	Negligible	n/a	Negligible	Negligible
World Heritage Site							
Tower of London	High	Yes	Negligible/Indirect/Permanent/Likely	Negligible	n/a	Negligible	Negligible
Conservation Areas							
South Shoreditch	Medium	n/a	Moderate/ Indirect/Permanent/Likely	Minor beneficial	n/a	Minor beneficial	Minor beneficial
Boundary Estate	Medium	n/a	Moderate/ Indirect/Permanent/Likely	Minor adverse	n/a	Minor adverse	Minor adverse
Redchurch Street	Medium	n/a	Minor/ Indirect/Permanent/Likely	Negligible	n/a	Negligible	Negligible
Brick Lane and Fournier Street	Medium	n/a	Moderate/ Indirect/Permanent/Likely	Moderate beneficial	n/a	Moderate beneficial	Moderate beneficial
Elder Street	Medium	n/a	Moderate/ Indirect/Permanent/Likely	Minor adverse	n/a	Minor adverse	Minor adverse
Listed buildings							
Braithwaite Viaduct	High	n/a	Moderate/Direct/Permanent/Likely	Moderate beneficial	n/a	Moderate beneficial	Moderate beneficial
The Forecourt Wall, Oriel and Gates to the Goods Station	High	n/a	Moderate/Direct/Permanent/Likely	Moderate beneficial	n/a	Moderate beneficial	Moderate beneficial
Bethnal Green Road	Medium	n/a	Minor/Indirect/Permanent/Likely	Minor adverse	n/a	Minor adverse	Minor adverse
The Boundary Estate	Medium	n/a	Minor/Indirect/Permanent/Likely	Minor adverse	n/a	Minor adverse	Minor adverse
The Truman Brewery	Medium	n/a	Minor/Indirect/Permanent/Likely	Negligible	n/a	Negligible	Negligible
No. 149 Brick Lane	Medium	n/a	Negligible/Indirect/Permanent/Likely	Negligible	n/a	Negligible	Negligible
Nos. 2-38 Cheshire Street	Medium	n/a	Minor/Indirect/Permanent/Likely	Negligible	n/a	Negligible	Negligible
Commercial Street Centre	Medium	n/a	Moderate/ Indirect/Permanent/Likely	Minor beneficial	n/a	Minor beneficial	Minor beneficial
Commercial Street North and Quaker Street	Medium	n/a	Moderate/ Indirect/Permanent/Likely	Minor beneficial	n/a	Minor beneficial	Minor beneficial
Elder Street and Folgate Street	Medium	n/a	Moderate/ Indirect/Permanent/Likely	Minor adverse	n/a	Minor adverse	Minor adverse
Great Eastern Street	Medium	n/a	Moderate/ Indirect/Permanent/Likely	Minor beneficial	n/a	Minor beneficial	Minor beneficial
Redchurch Street	Low	n/a	Negligible/ Indirect/Permanent/Likely	Negligible	n/a	Negligible	Negligible
Shoreditch High Street	Medium	n/a	Moderate/ Indirect/Permanent/Likely	Minor beneficial	n/a	Minor beneficial	Minor beneficial
Worship Street	Low	n/a	Minor/ Indirect/Permanent/Likely	Negligible	n/a	Negligible	Negligible
The Geffrye Museum	Low	n/a	Minor/ Indirect/Permanent/Likely	Negligible	n/a	Negligible	Negligible
Registered Parks or Gardens							
Arnold Circus	Medium	n/a	Minor/ Indirect/Temporary/Likely	Negligible	n/a	Negligible	Negligible

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