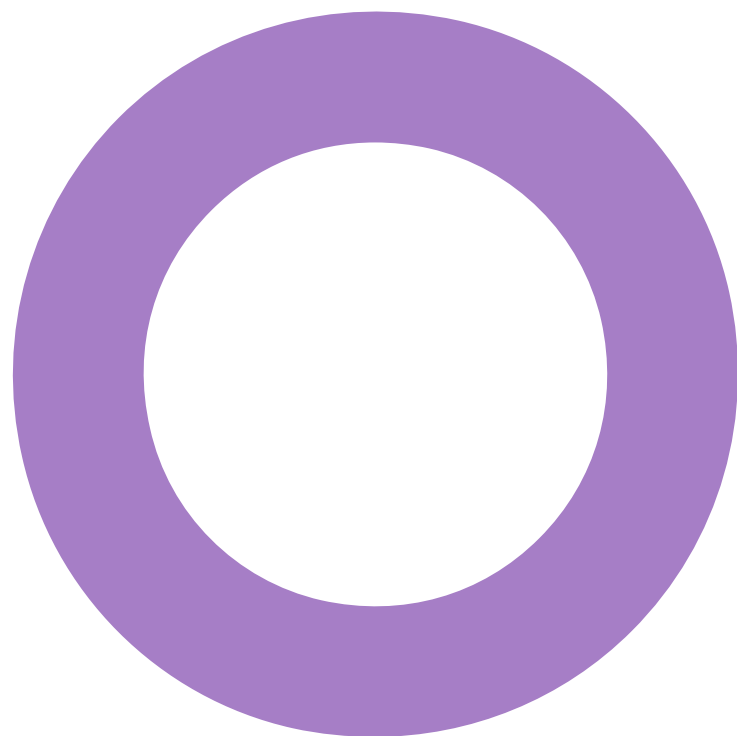


**Bishopsgate Goods Yard Plot 05, Sclater Street.  
London.**  
**Bishopsgate Goods Yard Regeneration Limited.**

**SUSTAINABILITY**  
SUSTAINABILITY STATEMENT

REVISION P02 – 18 MARCH 2024



## Audit sheet.

Rev.	Date	Description of change / purpose of issue	Prepared	Reviewed	Authorised
P01	27/02/2024	Initial Issue	L. Flockton	R. Palmer	J. Nuttall
P02	18/03/2024	Second Revision	L. Flockton	R. Palmer	J. Nuttall

This document has been prepared for Bishopsgate Goods Yard Regeneration Ltd. only and solely for the purposes expressly defined herein. We owe no duty of care to any third parties in respect of its content. Therefore, unless expressly agreed by us in signed writing, we hereby exclude all liability to third parties, including liability for negligence, save only for liabilities that cannot be so excluded by operation of applicable law. The consequences of climate change and the effects of future changes in climatic conditions cannot be accurately predicted. This report has been based solely on the specific design assumptions and criteria stated herein.

Project number: 23/24734

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## Contents.

Audit sheet.	2
Foreword.	4
Executive Summary.	5
<b>1. Introduction.</b>	<b>6</b>
1.1 The Application	6
1.2 Application site description and location.	6
<b>2. Policy Context and Drivers.</b>	<b>7</b>
2.1 Relevant National and Local Policies	7
<b>3. Proposed Sustainability Strategy.</b>	<b>8</b>
3.1 Approach to Sustainability	8
3.2 Achieving a Sustainable Development	8
<b>4. Direct Response to Hackney and Tower Hamlets Local Plan</b>	<b>9</b>
<b>Appendix A – Policy Context Review.</b>	<b>15</b>
Current Policy Framework.	15
National Policy.	15
Local Policy.	15
Local Policy.	20

## Foreword.

### **Starting with sustainability.**

No longer simply ticking boxes, today sustainability is about making real-term impacts. Increasingly, it has become the starting point – and the heart – of ambitious projects. On each and every project, we take an exciting journey together with clients and project teams to help shape a more sustainable world. It's important to find experts who truly understand the often-complex sustainability standards and interpret into simple, clear aims.

### **A sustainability framework.**

Within the built environment, considering five defined factors and their value is key to a connected approach: the people, the building, the social network, the natural environment, and the economic aspects. These form the basis of our sustainability framework which is tailored to the needs of each project.

### **Stakeholder engagement.**

Working with the project team we actively engage with the various project stakeholders throughout the planning process. We collaborate with the client and project team as well as key stakeholders to create informed innovative strategies. Each strategy responds to the five elements of our framework, and we make sure we articulate it in an accessible and engaging way no matter the complexity.

### **Ahead of the industry.**

Our team is actively shaping the future of sustainable practices. We conduct in-depth research, author industry guidance, build close links with sector-wide organisations, and sit on influential committees. The result is an unrivalled ability to provide informed, strategic advice that stays ahead of industry changes and is pivotal to our successful input to planning.

### **Purpose of this report.**

This Sustainability Strategy has been prepared on behalf of Bishopsgate Goods Yard Regeneration Ltd. (hereafter referred to as the 'Applicant') in support of the application for planning permission for the proposed development of the Bishopsgate Goods Yard Plot 05, Sclater Street, within the Borough of Tower Hamlets, East London.

## Executive Summary.

This report presents the Sustainability Strategy for the Proposed Development which has been informed by national, regional, and local policies – that is, Building Regulations Part L 2021, the Greater London Authority (GLA) London Plan (2021), the London supplementary planning guidance (SPG) on Sustainable Design and Construction (2014) and the London Borough of Tower Hamlets Local Plan 2031 (2020).



The Five Capitals Model is being applied to capture the multi-faceted sustainability benefits that the Proposed Development potentially brings to the Application Site, local community, surrounding businesses, and future building users.

### Natural Capital – enhancing the environment

The Proposed Development will explore opportunities to protect and enhance site biodiversity. Consideration has been given to the use of recycled materials and materials with low environmental impact. Sustainable waste management practices will be promoted during both excavation, construction, and operational phases of the Proposed Development.

A Circular Economy Statement has been put together in support of the reserved matters application for the wider site outlining how the building will seek to adopt the associated principles throughout design, construction and end of life.

### Human Capital – people centred design

The Proposed Development will seek to optimise the health and wellbeing of staff and visitors alike by seeking to achieve good levels of internal daylight, thermal comfort, safety and security. The strategic layout and various building orientations maximise daylight across office and public spaces, window reveals and other features provide passive solar shading.

A Travel Plan has been developed, setting out targets and measures for promoting occupant sustainable transport, including recommendations for the reduction of transport impacts.

### Social Capital – partnerships and collaboration

The Proposed Development will add value to the local community, its activities, and economic outputs by taking into account the needs of the local community.

This project will rejuvenate currently derelict buildings to become inviting cafes/bars and office space.

### Physical Capital – designed for performance

A separate energy strategy is being submitted in support of this planning application. The Energy Strategy is in line with the principles of the Energy Hierarchy, that is “Be Lean”, “Be Clean” and “Be Green”.

The proposed energy strategy for the development incorporates a 5<sup>th</sup> generation low carbon community network at ambient temperature, served by Air Source Heat Pumps. Local ventilation units will be equipped with heat recovery units to enhance efficiency and reduce heat losses.

Overall, the reductions for both the new build and refurbishment are highlighted below:

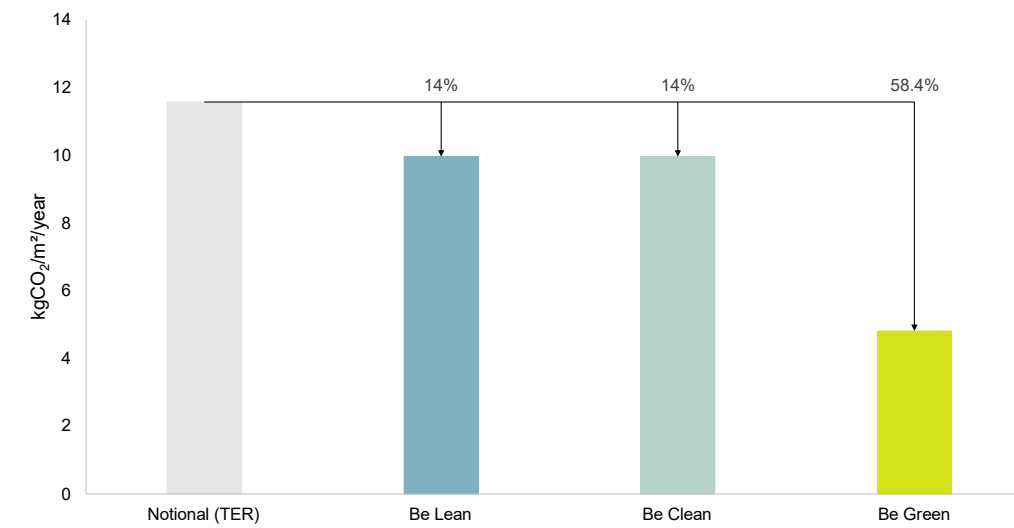


Figure 1: New build comparison of regulated carbon emissions

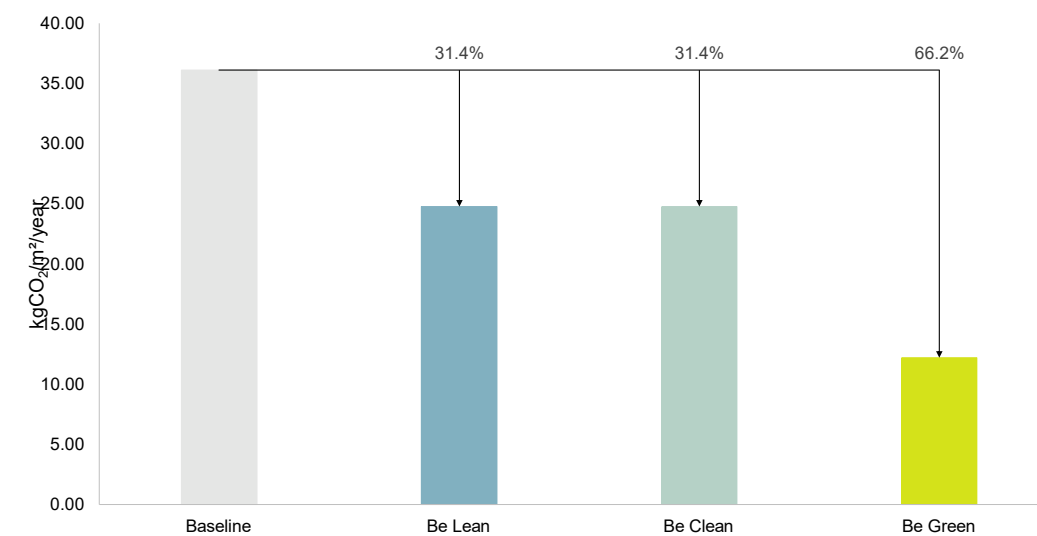


Figure 2: Refurbishment comparison of regulated carbon emissions

Assessment	Baseline	Be Lean/Clean		Be Green	
	tCO <sub>2</sub> /year	tCO <sub>2</sub> /year	% Reduction	tCO <sub>2</sub> /year	% Reduction
New Build	3.31	2.85	14.0	1.38	58.4
Refurbishment	25.84	17.73	31.4	8.75	66.2

Table 1: Part L Performance Summary Table

### Economic Capital – productivity and growth

To deliver whole-life value from the Proposed Development and promote economic sustainability, as well as boosting the local economy, the use of local businesses and suppliers will be encouraged during the construction stage.

## 1. Introduction.

### 1.1 The Application.

This document has been prepared on behalf of Bishopsgate Goods Yards Regeneration Ltd., hereafter referred to as the 'Applicant', in support of the reserved matters planning application for Bishopsgate Goods Yard Plot 05, Sclater Street, hereafter referred to as the 'Proposed Development'.

The Sustainability Strategy summarises the pertinent regulatory and planning policies applicable to the Proposed Development and sets out how the Proposed Development addresses the relevant policy requirements.

### 1.2 Application site description and location.

Bishopsgate Goods Yard Plot 05, Sclater Street Buildings comprise of three heritage buildings: Mission Chapel, Victorian Building, and Weavers Cottages.

It is proposed that: Mission Chapel is repurposed to provide a café type facility; the Victorian Building is combined into a single commercial unit, with residential units above; and Weavers Cottage is to be restored, and Weavers Cottage outbuildings demolished to build a new 3-storey extension creating a coworking office space.



Figure 3 Architectural visualisation of Bishopsgate Goods Yard - Sclater Street



Figure 4 Street View of Sclater Street

## 2. Policy Context and Drivers.

### 2.1 Relevant National and Local Policies

A detailed policy review has been undertaken, please see Appendix A for details.

As a summary, planning policy documents applicable to the Proposed Development have been identified and include the below listed:

- National Planning Policy Framework (2021)
- National Building Regulations (2021)
- The London Plan (2021)
- London Borough of Tower Hamlets Local Plan 2031 (2020)

Key targets from these documents are summarised below:

- Site layout and sustainable design principles to reduce energy demand and increase efficiency.
- A minimum on-site reduction of at least 35 percent beyond Building Regulations 2021 Part L for new build major development.
- Applicants for major development should undertake and submit a circular economy statement.
- Maximising reuse/refurbishment in order to reduce material use and maximise circularity.
- Where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site for the new build elements of the scheme, any shortfall should be provided, in agreement with the Borough, either:
  1. through a cash in lieu contribution to the Borough's carbon offset fund, or
  2. off-site provided that an alternative proposal is identified, and delivery is certain.



Figure 6 Reviewed Policy Documents.

### 3. Proposed Sustainability Strategy.

#### 3.1 Approach to Sustainability.

The following strategy addresses a wide range of sustainability subject areas and covers various headline sustainability categories. The strategy confirms the applicable policies, the Applicant's aspirations and measures of sustainability that will be implemented at the Proposed Development.

The design has been based on sustainable design and construction principles as informed by planning requirements and industry best practice. It is on this basis that the Five Capitals Model as illustrated in Figure 7 is being applied to capture the multi-faceted sustainability benefits that the Proposed Development will bring to the:

- Application Site
- Local community
- Surrounding businesses, and
- Future occupants and other building users.

#### 3.2 Achieving a Sustainable Development.

##### The Delivery Framework

The overall energy and sustainability objectives for the Proposed Development have been encapsulated within the Five Capitals Model for Sustainability. More specifically to the energy aspect, the Energy Strategy is being delivered in line with the Energy Hierarchy – please refer to the separate energy strategy submitted in support of this planning application for further detail.

The original idea for the five capitals was introduced by Forum for the Future and it was designed to assist organisations to develop a vision of what sustainability looks like for their operations, products and services. We have embraced this approach as it promotes a holistic, interdisciplinary approach to sustainability which is aligned with our understanding of sustainable development.

Our strategy is based on the concept of realising real term social, economic and environmental benefits to all stakeholders and investors and thereby generating value and wealth in the communities we create.



## CREATING VALUE



Figure 7 Proposed Framework for Sustainability – The Five Capitals Model.

Physical Capital	<p><b>“Building the future”</b>                      Creating high quality buildings ensures <b>PHYSICAL VALUE</b> is increased where buildings and infrastructure project an image of design for longevity and allow people to navigate easily on foot/by bicycle.</p>
Social Capital	<p><b>“Connecting people”</b>                      By enabling community identity, <b>SOCIAL VALUE</b> is increased where a great place brings people together and creates a community.</p>
Economic Capital	<p><b>“New opportunities”</b>                      By ensuring equity for all, <b>ECONOMIC VALUE</b> is increased where all users of a place feel they have a level of ownership of the asset and buy-in to the outcomes it is seeking to achieve.</p>
Human Capital	<p><b>“Happy and healthy”</b>                      With a focus on people, <b>HUMAN VALUE</b> is increased where quality and longevity of life is improved, and happiness is increased.</p>
Natural Capital	<p><b>“Positive impact”</b>                      By seeking to achieve positive gain, <b>NATURAL VALUE</b> is increased where existing quality is protected, and new complementary resources are introduced.</p>

Table 2: Proposed Framework for Sustainability – The Five Capitals Model.

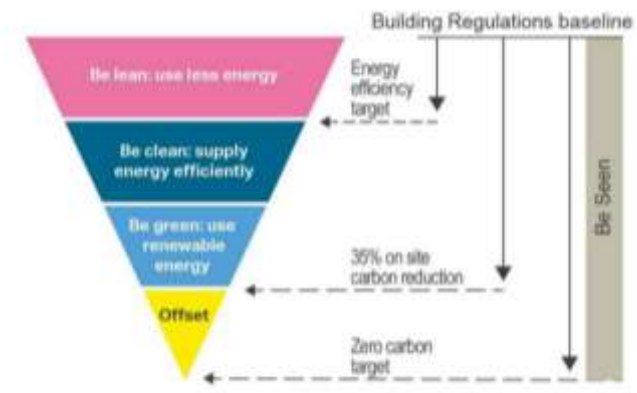
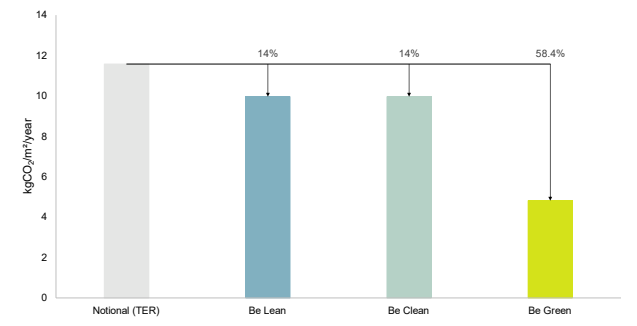


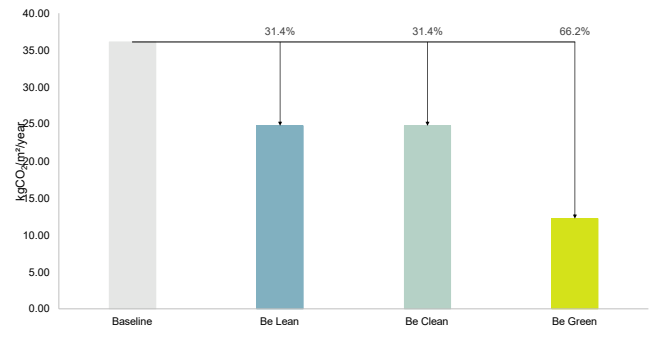
#### 4. Direct Response to Hackney and Tower Hamlets Local Plan.

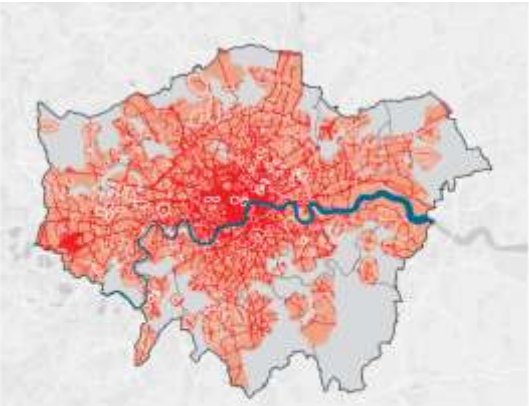

The following checklist has been written in accordance with the new London Plan adopted in March 2021, Hackney Local Plan (2020) and Tower Hamlets Local Plan (2020).

Policy Targets	Proposed Development Response
<b>Circular Economy</b>	
Applicants of major development should submit Circular Economy Statements in-line with the policy.  All scales of development should consider the circular economy principles from the very beginning of their project.	A Circular Economy statement is being produced by Temple and will be submitted in support of this application.  Please see report Bishopsgate Goods Yard Sclater Street CES for further details
All development should provide adequate waste storage facilities.  Homes should be built with enough storage inside and outside for both waste and recycling (including food waste).	Residential – Residential waste store will be within the footprint of the development at ground floor level for collection: <ol style="list-style-type: none"> <li>1. Refuse – 1 x 240 litre wheeled bins;</li> <li>2. Recycling – 1 x 240 litre wheeled bin; and</li> <li>3. Food Waste – 1 x 80 litre wheeled bins, or 3 x 23 litre food caddies.</li> </ol> Commercial – commercial waste strategy will require the tenants to provide a suitable waste storage area within the tenanted areas during their fitout, and these areas would have to be sized to store a least one day's waste. The tenant would then be responsible for arranging a waste collection through a commercial waste contractor.
<b>Energy Hierarchy and Whole Life-Cycle Approach</b>	
All developments should follow the energy hierarchy.	The key energy strategy will be established in line with the GLA New London Plan Policy, as well as the London Borough of Hackney Local Plan (2020) and London Borough of Tower Hamlets Local Plan (2020). The design will follow the principles of the energy hierarchy by following the steps in the below order; Be Lean, Be Clean, Be Green, Offset. The development will include Low Zero Carbon energy sources such as Photovoltaics (PV) and Air Source Heat Pumps (ASHP).
Applicants for major development should undertake and submit a whole lifecycle assessment.	As Sclater Street is not considered a mayor referable development, a whole life carbon assessment has been deemed not required for this development.

Policy Targets	Proposed Development Response
The information will be required at the pre-application, full application and post-construction stage.  Pre-application stage – this should set out the principles which are informing the development of the site.  Application stage – Assessment against each life-cycle module as shown in figure 4.1 will be expected. This stage also requires two assessments: the first accounts for the current status of the electricity grid and the second for its expected decarbonisation. Applicants may determine which assessment is to form the basis of design decisions.  Post-construction stage – this is an important stage so any performance gaps between design and delivery can be understood. This should be undertaken within three months of completion. This will require an update of the information provided at the planning stage and for the actual whole life-cycle emission figures to be reported.  All developments should bear in mind the potential to minimise embodied emissions by following the principles set out in Table 2 of the GLA Whole Life-Cycle Carbon Assessments Guidance, Consultation Draft, October 2020. This or any update to this guidance should be followed by applicants.	
<b>Reduce Energy Demand</b>	
Applicants for developments of all scales must reduce energy demand by optimising building design.	A separate energy statement has been put together in support of the planning application outlining how the building will seek to adopt the London Plan energy

Policy Targets	Proposed Development Response
	<p>hierarchy:</p>  <p>The design employs a fabric first approach to reduce energy demands and resultant carbon emissions. The development is retaining and repairing the façade where required, introducing new double-glazed windows and replacing the roof where required.</p> <p>Sclater Street will incorporate efficient mechanical ventilation with heat recovery. Low energy LED lighting has been incorporated throughout.</p>
<p>Applicants of major development should be net zero carbon. The Local Plan Policy CE1 will be extended to include a requirement for net zero carbon not only from major residential development but also to major non-residential development. To achieve this, the Council will apply London Plan Policy SI2 C, this requires:</p> <p>A minimum on-site reduction of at least 35 percent beyond Building Regulations 2013 Part L11 for major development.</p> <p>Residential development should achieve 10 per cent, and non-residential development should achieve 15 per cent through energy efficiency measures. Where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site, any shortfall should be provided, in agreement with the Borough, either:</p> <p>1) through a cash in lieu contribution to the Borough's carbon offset fund, or</p>	<p>The Proposed Development has been split into two assessments: New Build and Refurbishment as required by the London Plan methodology.</p> <p>New Build:</p> <p>The New Build parts of the development are estimated to achieve a 58.4% reduction against the building Part L 2021 Target Emission Rate (TER), therefore meeting and exceeding the 35% reduction required by The London Plan. This includes a 14% reduction at the Be Lean stage of the hierarchy. The chart below shows the resulting reductions from the Be Lean, Clean Green strategies for the New Build elements of the proposal.</p> 

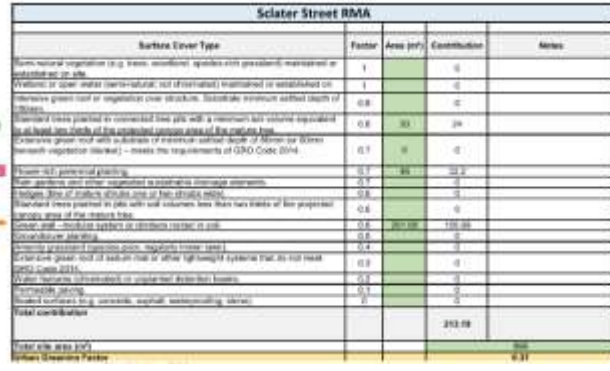
Policy Targets	Proposed Development Response
<p>2) off-site provided that an alternative proposal is identified, and delivery is certain.</p> <p>The London Plan 2021 encourages boroughs to include BREEAM targets in their Local Plans where appropriate. Therefore, in addition to the net zero requirement for major non-residential developments, we will also apply Local Plan Policy CE1 b. This requires an assessment to demonstrate that non-residential development meets BREEAM very good with 60 per cent of the unweighted credits available in the energy, water and materials sections.</p> <p>Achieving BREEAM 'very good' standard has the added benefit that it will involve external third-party validation and auditing of modelling.</p>	<p>Refurbishment:</p> <p>The Refurbishment parts of the development are estimated to achieve a 66.2% reduction against the London Plan methodology's refurbishment baseline. This includes a 31.4% reduction at the Be Lean stage of the hierarchy. The chart below shows the resulting reductions from the Be Lean and Be Green strategies for Refurbishment.</p>  <p>An 5<sup>th</sup> generation ambient loop community heat network led by low carbon technology, together with a fabric-efficient approach, is proposed to achieve reductions in energy demands and associated carbon emissions.</p> <p>Once carbon emissions have been minimised through all available pathways, any new build residual emissions will be offset in order to be net zero in operation in line with the London Plan requirements. The offsetting strategy is under consideration for the Bishopsgate Gods Yard site.</p>
<p>We strongly support use of voluntary industry standards and assessment methods to demonstrate achievement of carbon reductions beyond Building Regulation requirements.</p> <p>Applicants for minor development are encouraged to adopt low carbon heating.</p>	<p>The scheme will adopt low carbon heating as detailed in the energy statement provided as part of this application and discussed above.</p>
<p>Development proposals should minimise adverse impacts of the urban heat island through design, layout, orientation, materials and the incorporation of green infrastructure. Applicants for minor development are encouraged to adopt low carbon heating solutions.</p>	<p>The Landscape strategy is being developed by Spacehub and will be submitted in support of this application.</p> <p>New glazing with a g-value of 0.40 will be incorporated to prevent increased solar gain and associated cooling demands. Due to the constraints of an existing buildings it is not viable to influence the orientation of these buildings. However, consideration has been taken with</p>



Policy Targets	Proposed Development Response
	regards to the location of new build elements in order to encourage low energy heating and cooling solutions.
Heat Networks	
<p>Major development proposals within Heat Network Priority Areas<sup>16</sup> (the entire Borough is within this area) should have a communal low-temperature heating system:</p> <p>The heat source for the communal heating system should be selected in accordance with the following heating hierarchy;</p> <p>a) connect to local existing or planned heat networks b) use zero-emission or local secondary heat sources (in conjunction with heat pumps, if required) c) use low-emission combined heat and power (CHP)<sup>17</sup> (only where there is a case for CHP to enable the delivery of an areawide heat network, meet the development's electricity demand and provide demand response to the local electricity network) d) use ultra-low NOx gas boilers</p> <p>There are a limited number of heat networks in the Borough. However, opportunities for their development are being considered. Therefore, applicants should explore designing in the ability to connect to a future and/or proposed heat network.</p> <p>As most applicants for new development will not be in a position to connect into an existing heat network, the Council will expect major development to deliver low temperature communal distribution systems served by heat pumps in-line with criteria b. above.</p>	<p>The utilisation of a local district heat network could be a potential low-carbon source of heating for the proposed development. The Proposed Development falls within a 'heat network priority area'.</p>  <p><b>Heat Network Priority Areas and Heat Density in London</b> Relative heat demand based on fuel use kWh/m<sup>2</sup>/year Source: GLA Environment Contains OS data © Crown copyright and database right (2017)</p> <ul style="list-style-type: none"> <li>Heat Network Priority Areas</li> <li>Areas where legal air quality limits are exceeded</li> <li>Local Authority Heat Network Studies</li> </ul> <p>However, development of the Shoreditch South Proposed Network is too early stage to be considered for this development currently. Discussions with the local council are ongoing (Appendix E).</p>  <p>In exploring other current opportunities, there are numerous factors that limit the opportunity to connect to a DHN, specifically:</p>


Policy Targets	Proposed Development Response
	<ul style="list-style-type: none"> <li>No DHN existent in feasible proximity to the Bishopsgate Goods Yard Sclater Street site.</li> <li>There are two proposed networks (LB Tower Hamlets and Proposed City 2 heat networks), however these are deemed not to be in close enough proximity to the Bishopsgate Goods Yard Sclater Street site.</li> <li>No programme for Building of the heat network in close proximity.</li> <li>Major infrastructure obstacles between future proposed network and building location, including the railway.</li> <li>Gas led heat network would have higher carbon intensity than grid electricity and no route to future decarbonisation currently.</li> <li>Combustion based heat network would be a detriment to local air quality.</li> </ul> <p>This being said, the Proposed Buildings look to take advantage of a site-wide community heat network. The loop will connect all plots on the Bishopsgate Goods Yard site, allowing energy to be shared across the building, reducing the primary energy needed to meet the site-wide heating and cooling demands at any given time.</p>
Renewable Energy	
<p>Applicants for development of all scales should consider on-site renewable energy sources.</p> <p>Maximising opportunities for renewable energy by producing, storing and using renewable energy on-site is a key strand of the energy hierarchy as set out in Policy SI 2 of the London Plan 2021.</p> <p>Local Plan Policy CE1 (c)(ii), also includes the provision of onsite renewable and low-carbon energy generation as part of the energy hierarchy. Key guidance Energy (Be Green)</p> <p>Applicants for development at all scales should consider on-site renewable energy sources</p> <p>The key renewable energy sources that will work in the context of the Borough are solar PVs and heat pumps. 43 S</p>	<p>There are no feasible existing or proposed district heat networks in close proximity to the building. Therefore, the site will implement its own community heat network served by centralised plant. The proposed network will be a 5<sup>th</sup> generation network at ambient temperature to reduce distribution heat losses and allow energy sharing opportunities between buildings.</p> <p>This network is proposed to be connected to the Sclater Street buildings, The benefit of an ambient loop on a large scheme such as Bishopsgate Goods Yard is that the proposed building uses will have a varying demand profiles to other plots on the site. This allows each building to reject heat into the loop during the day whilst operating in cooling mode. In this scenario, the ASHPs connected to the ambient loop would operate at a much-reduced load to stabilise the temperature in the loop, effectively acting as a top-up, as the energy within the loop is predominantly provided from the balance of demand across the buildings, providing "free" energy. Therefore reducing the operational energy of the proposed Sclater Street buildings.</p>

Policy Targets	Proposed Development Response
Submit a noise and vibration assessment where an air source heat pump is proposed, and planning permission is required.	Being such a dynamic and complex system with varying demands and temperatures, it is very difficult to calculate the benefit that this “free” exchange of energy has on the overall system efficiency. Additionally, approved Part L calculation software (used to undertake the calculations in this report) do not include input options to demonstrate the benefits of an ambient loop. However, it should be noted that we envisage the actual on-site energy loop to operate at a much-improved overall efficiency to the figures stated within the software inputs section of this report, which will bring further benefits to the “Be Clean” energy strategy approach to those tabled herein.  Therefore, the scheme will integrate Air Source Heat Pumps (ASHP) which will be connected to a local ambient heat network to deliver space heating and hot water. Additionally, there is also 26.2m <sup>2</sup> of photovoltaics (PV) proposed for the scheme to be located on the Victorian Building roof of the proposed Sclater Street buildings.
<b>Monitoring</b>	
For major development applicants should, where applicable, build reporting requirements into their agreements with building owners, tenants and energy system operators.  Applicants for minor development are encouraged to follow the same process where possible. As a minimum, it is recommended to introduce smart energy and water metering that will allow occupants to monitor their own consumption of energy and water.	Effective energy metering will be enabled by the provision of suitable infrastructure within the building services systems. This will enable energy usage of the central plant to be monitored, and the system performance optimised. Electrical and thermal meters will be provided on the main central heat pumps, providing data on plant energy consumption throughout the year.  Each tenant area and each area of high energy load will be sub-metered in order to monitor energy consumption in greater granularity and facilitate billing and reporting. Energy intensity and carbon emissions will be monitored and reported annually. Energy performance will be verified and reported on through the Mayor's post construction monitoring platform in line with appropriate guidance.  The Applicant is committed to monitoring and reporting sustainability performance and data every year in a transparent way.
<b>Air Quality</b>	

Policy Targets	Proposed Development Response
Applicants for major development are required to submit an Air Quality Assessment (AQA) as part of the planning application.  In February 2023, the GLA adopted Air Quality Positive Guidance to replace the previous ‘Air Quality Neutral’ approach. The new guidance seeks to ensure new buildings contribute actively to a progressive reduction in the total amount of London’s emissions and associated exposure.  Developments in Air Quality Focus Areas, or that are likely to be used by large numbers of people, should demonstrate that design measures have been used to minimise exposure.  Masterplans and development briefs for large-scale development proposals subject to an Environmental Impact Assessment should consider how local air quality can be improved across the area of the proposal as part of an air quality positive approach.  Applicants for small scale development are also encouraged to consider air quality at all stages from design to operation stage.	An air quality assessment has been undertaken for the wider Bishopsgate Goods Yard site is to be submitted as part of the planning application, which will form part of the Environmental Statement. It will assess the impact of the development on concentrations of nitrogen dioxide and particulate matter (PM10 and PM2.5), including emissions from road traffic and from energy plant to be installed (such as backup diesel generators). The assessment will also determine the air quality conditions that future residents and occupiers will experience.  The site is located across two Air Quality Management Areas (AQMA), Tower Hamlets AQMA and Hackney AQMA, declared for exceedances of the AQOs for exceedances of the annual mean and 1-hour mean NO <sub>2</sub> objectives, and the annual mean and 24-hour mean PM <sub>10</sub> objectives.  The site is partially located in an Air Quality Focus Area and 15 m north of a neighbouring AQFA. The assessment will determine any impacts of the development on concentrations of pollutants in the Focus Areas.  A review of external baseline air quality at the site show exceedances of the annual mean NO <sub>2</sub> AQO, but that the 1-hour mean NO <sub>2</sub> AQO for PM <sub>10</sub> and PM <sub>2.5</sub> , and 24-hour PM <sub>10</sub> AQOs are likely to be complied with. The WHO guidelines for all pollutants are likely to be exceeded at the Site. However, for Plot 01 specifically, there are only likely to be exceedances of the WHO guidelines for PM <sub>10</sub> and PM <sub>2.5</sub> .  As no combustion sources are proposed for the primary energy supply, no local air quality impacts are anticipated and a detailed assessment of impacts of combustion emissions from the energy plant will not be required.  The impacts on air quality from emissions generated by operational phase traffic and combustion sources included in the design proposals are likely to be not significant.  Additionally, the Air Quality Positive Statement is being produced by Temple and will be included as part of the

Policy Targets	Proposed Development Response
	EIA Statement of Conformity submitted in support of this application.
Local Plan Policy CT1 requires that walking, cycling and public transport are safe, easy, attractive and inclusive for all.  All development proposals should seek to support sustainable and active transport options and minimise any increase in traffic congestion or on-street parking pressure.	WSP are the contracted transport consultants for the proposed development, and it is understood that a transport assessment and travel plan will be developed in support of this submission for the Bishopsgate Goods Yard site.  The Sclater Street site will contain: <ul style="list-style-type: none"> <li>- 8 x long-stay cycle parking spaces for the Residential units, located in access to Plots 5B and 5C (between the Mission Chapel and Victorian Buildings)</li> <li>- 8 x long-stay cycle parking spaces for the Office use in the courtyard to the rear of Weavers Cottage building</li> <li>- 14 x short-stay cycle parking spaces for all visitors to the Sclater Street Buildings</li> </ul>
Urban Greening	
Applicants for major development should submit an assessment showing the UGF score.  The UGF score should achieve at least 0.4 for residential and of 0.3 for commercial developments.  Achieving an improved UGF score is encouraged for small-scale developments. It is encouraged that applications for minor development include a calculation of the existing and proposed UGF.	A specific landscape strategy has been developed by Spacehub for Sclater Street, the image below outlines the specific UGF for the development. This is indicated to be 0.31.  
Minimising flood risk	

Policy Targets	Proposed Development Response
Flood risk  Major and most minor developments at ground level will require Flood Risk Assessments in Flood Zones 2, 3 and Critical Drainage Areas	The Environment Agency Flood Risk Map ( <a href="https://flood-map-for-planning.service.gov.uk/">https://flood-map-for-planning.service.gov.uk/</a> ) confirms that the Proposed Development is in Flood Zone 1 and thus has a low probability of flooding from rivers and the sea.    <ul style="list-style-type: none"> <li>• Sequential and exception tests may be needed for some developments.</li> <li>• The sequential test compares the proposed site with other available sites to find out which has the lowest flood risk.</li> <li>• The exception test demonstrates that flood risk to people and property will be managed satisfactorily, while allowing necessary development to go ahead in situations where suitable sites at lower risk of flooding are not available.</li> </ul>
Flood risk measures and flood risk assets should be shown on plans and maintained to ensure they are in working condition through the development's lifetime.	However, referring the long-term flood risk survey <a href="https://check-long-term-flood-risk.service.gov.uk/">https://check-long-term-flood-risk.service.gov.uk/</a> suggests that the development is high risk of flooding during potential future extreme rainfall events.  
Water Infrastructure  Development in opportunity areas should produce an Integrated Water Management Strategy at an early stage.  Major development:	Mains water consumption will be designed to meet target of 105 litres or less per person per day within the residential areas. The use of low flow water use fittings, metering and leak detection will contribute to lowering water demand for the non-domestic elements of the scheme.

Policy Targets	Proposed Development Response
<ul style="list-style-type: none"> <li>Residential development should achieve water consumption of 105l/day per head (excluding 5l external water allowance).</li> <li>Commercial development to achieve at least the BREEAM excellent standard for the 'Wat 01' water category or equivalent.</li> </ul>	
<p>SuDS are required throughout the Borough for all major development and for small-scale development at ground and below ground levels.</p> <p>Major development should achieve greenfield run-off whereas small-scale development should provide a 50% betterment.</p> <p>The retrofitting of SuDS is encouraged even if the development will not have drainage implications.</p> <p>Green SuDS which allow for natural drainage and provides multiple benefits are preferred as they provide multiple benefits.</p> <p>Attenuation tanks (tank which store rainwater below ground and which require pumping) and other grey infrastructure which only store water are not encouraged.</p> <p>It is encouraged that a drainage engineer is engaged to design the SuDS and ensure compliance with Building Control regulations.</p>	<p>The levels and drainage strategy has been coordinated with plot architects and the wider team and is based on the high level strategy produced at the planning stage. The strategy provides a public realm which is accessible to all. The levels and drainage General Arrangement drawing can be found below.</p> 

Policy Targets	Proposed Development Response
<ul style="list-style-type: none"> <li>an Ecological Constraints and Opportunities Plan (ECOP);</li> <li>a balance table showing habitats lost, gained and their importance.</li> </ul> <p>Major Developments are expected to achieve an UGF score of at least 0.4 for residential developments and of 0.3 for commercial as well as at least a 10 per cent biodiversity net gain.</p> <p>Small-scale developments should consider the protection and enhancement of the site's biodiversity.</p>	<p>The proposals should incorporate open mosaic habitat which can include:</p> <p>Sparsely vegetated, low nutrient substrates of different grades, sculpted into landforms; diversity from bare areas to scrub patches; ephemeral and pioneer vegetation; wildflower rich areas and native scrub; biodiversity roofs will help provide replacement habitat of this nature.</p>

<b>Biodiversity</b>	
<p>Applicants for major development should submit an ecological survey and assessment to identify existing biodiversity features and likely impacts. Minor developments should have regard for biodiversity and applicants should check if an ecological survey is required.</p> <p>Applications for major development should also include:</p> <ul style="list-style-type: none"> <li>an Ecological Impact Assessment or Preliminary Ecological Assessment;</li> </ul>	<p>Sclater Street:</p> <p>Opportunities to maximise urban greening at ground level have been maximised, taking into account the various site constraints such as existing and proposed utilities, light levels, wind, vehicular movements and heritage sensitivities.</p> <p>Opportunities to provide vertical greening in the form of climbing plants will be explored wherever possible.</p>

## Appendix A – Policy Context Review.

### Current Policy Framework.

The policies considered when preparing this strategy are contained in Part L of the Building Regulations, the London Plan (GLA, 2021) and the local planning policy of the London Borough of Tower Hamlets.

### National Policy.

#### Approved Document Part L 2021: Conservation of fuel and power

Part L of the Building Regulations is the mechanism by which Government is driving reductions in the regulated CO<sub>2</sub> emissions from new buildings. The residential elements will be required to comply with Part L1A and the commercial elements with Part L2A of Approved Document Part L 2021 (ADL 2021) which was enforced on 15<sup>th</sup> June 2022.

The main updates under ADL 2021 are as follows:

- It is now significantly more challenging to achieve compliance with fossil fuel heating, therefore an all-electric heat pump strategy is likely to be the preferred solution
- A varying carbon factor associated with grid electricity is 73% lower on average than ADL 2013
- A new non-domestic building will deliver a 27% reduction in CO<sub>2</sub> emissions on average across the new-build non-domestic building mix relative to ADL 2013
- A primary energy target has been introduced and the Fabric Energy Efficiency target retained
- Schedule 1 of the Building Regulations Part L states that reasonable provisions shall be made for: Limiting Heat Gains and Losses through;
  - Thermal elements and other parts of the building fabric; and;
  - From pipes, ducts and vessels used for space heating, space cooling and hot water services.
- Providing fixed building services which are:
  - Energy Efficient;
  - Have effective controls; and;
  - Are commissioned by testing and adjusting as necessary to ensure they use no more fuel and power than is reasonable in the circumstances

### Local Policy.

#### London Plan (March 2021).

##### Policy G5 – Urban greening

Major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage.

Boroughs should develop an Urban Greening Factor (UGF) to identify the appropriate amount of urban greening required in new developments. The UGF should be based on the factors set out in Table 8.2 but tailored to local circumstances. In the interim, the Mayor recommends a target score of 0.4 for developments that are predominately residential, and a target score of 0.3 for predominately commercial development (excluding B2 and B8 uses).

Existing green cover retained on site should count towards developments meeting the interim target scores set out in (B) based on the factors set out in Table 8.2

##### Policy G6 – Biodiversity and access to nature

Sites of Importance for Nature Conservation (SINCs) should be protected.

Boroughs, in developing Development Plans, should:

- use up-to-date information about the natural environment and the relevant procedures to identify SINCs and ecological corridors to identify coherent ecological networks
- identify areas of deficiency in access to nature (i.e. areas that are more than 1km walking distance from an accessible Metropolitan or Borough SINC) and seek opportunities to address them
- support the protection and conservation of priority species and habitats that sit outside the SINC network, and promote opportunities for enhancing them using Biodiversity Action Plans
- seek opportunities to create other habitats, or features such as artificial nest sites, that are of particular relevance and benefit in an urban context
- ensure designated sites of European or national nature conservation importance are clearly identified and impacts assessed in accordance with legislative requirements.

Where harm to a SINC is unavoidable, and where the benefits of the development proposal clearly outweigh the impacts on biodiversity, the following mitigation hierarchy should be applied to minimise development impacts:

- avoid damaging the significant ecological features of the site
- minimise the overall spatial impact and mitigate it by improving the quality or management of the rest of the site
- deliver off-site compensation of better biodiversity value.

Development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process.

Proposals which reduce deficiencies in access to nature should be considered positively.

#### Policy SI 1 – Air quality

Development Plans, through relevant strategic, site-specific and area-based policies, should seek opportunities to identify and deliver further improvements to air quality and should not reduce air quality benefits that result from the Mayor's or boroughs' activities to improve air quality.

To tackle poor air quality, protect health and meet legal obligations the following criteria should be addressed:

- Development proposals should not:
  - lead to further deterioration of existing poor air quality
  - create any new areas that exceed air quality limits, or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits
  - create unacceptable risk of high levels of exposure to poor air quality.
- In order to meet the requirements in Part 1, as a minimum:
  - development proposals must be at least Air Quality Neutral
  - development proposals should use design solutions to prevent or minimise increased exposure to existing air pollution and make provision to address local problems of air quality in preference to post-design or retrofitted mitigation measures
  - major development proposals must be submitted with an Air Quality Assessment. Air quality assessments should show how the development will meet the requirements of B1
  - development proposals in Air Quality Focus Areas or that are likely to be used by large numbers of people particularly vulnerable to poor air quality, such as children or older people should demonstrate that design measures have been used to minimise exposure.

Masterplans and development briefs for large-scale development proposals subject to an Environmental Impact Assessment should consider how local air quality can be improved across the area of the proposal as part of an air quality positive approach. To achieve this a statement should be submitted demonstrating:

- how proposals have considered ways to maximise benefits to local air quality, and

- what measures or design features will be put in place to reduce exposure to pollution, and how they will achieve this.

In order to reduce the impact on air quality during the construction and demolition phase development proposals must demonstrate how they plan to comply with the Non-Road Mobile Machinery Low Emission Zone and reduce emissions from the demolition and construction of buildings following best practice guidance.

Development proposals should ensure that where emissions need to be reduced to meet the requirements of Air Quality Neutral or to make the impact of development on local air quality acceptable, this is done on-site. Where it can be demonstrated that emissions cannot be further reduced by on-site measures, off-site measures to improve local air quality may be acceptable, provided that equivalent air quality benefits can be demonstrated within the area affected by the development.

#### Policy SI 2 – Minimising greenhouse gas emissions

- Major development should be net zero-carbon. This means reducing greenhouse gas emissions in operation and minimising both annual and peak energy demand in accordance with the following energy hierarchy:
  - Be Lean: use less energy and manage demand during operation
  - Be Clean: exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly
  - Be Green: maximise opportunities for renewable energy by producing, storing and using renewable energy on-site
  - Be Seen: monitor, verify and report on energy performance.
- Major development proposals should include a detailed energy strategy to demonstrate how the zero-carbon target will be met within the framework of the energy hierarchy.
- A minimum on-site reduction of at least 35 per cent beyond Building Regulations is required for major new build development. Residential development should achieve 10 per cent, and non-residential development should achieve 15 per cent through energy efficiency measures. Where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site, any shortfall should be provided, in agreement with the borough, either:
  - through a cash in lieu contribution to the borough's carbon offset fund, or
  - off-site provided that an alternative proposal is identified, and delivery is certain.
- Boroughs must establish and administer a carbon offset fund. Offset fund payments must be ring-fenced to implement projects that deliver carbon reductions. The operation of offset funds should be monitored and reported on annually.
- Major development proposals should calculate and minimise carbon emissions from any other part of the development, including plant or equipment, that are not covered by Building Regulations, i.e. unregulated emissions.
- Development proposals referable to the Mayor should calculate whole life-cycle carbon emissions through a nationally recognised Whole Life Cycle Carbon Assessment and demonstrate actions taken to reduce life cycle carbon emissions.
- Where an existing building or group of buildings is refurbished and the development qualifies as a major refurbishment, applicants are required to provide an energy assessment demonstrating how the individual elements of the energy hierarchy have been implemented and how reductions in regulated CO2 emissions have been achieved. The BER/DER of the refurbished building should be determined following improvements at each stage of the energy hierarchy using Building Regulations compliance software. These figures should then be used to report the CO2 savings at each stage of the energy hierarchy in the carbon emissions reporting spreadsheet and included in the energy assessment.
- It is generally acknowledged that the level of carbon savings that can be achieved through a refurbishment can vary considerably, however every effort should be made to improve the energy performance of the building in line with London Plan carbon targets and to follow the energy hierarchy.

#### Policy SI 3 – Energy infrastructure

- Boroughs and developers should engage at an early stage with relevant energy companies and bodies to establish the future energy and infrastructure requirements arising from large-scale development proposals such as Opportunity Areas, Town Centres, other growth areas or clusters of significant new development.
- Energy masterplans should be developed for large-scale development locations (such as those outlined in Part A and other opportunities) which establish the most effective energy supply options. Energy masterplans should identify:
  - major heat loads (including anchor heat loads, with particular reference to sites such as universities, hospitals and social housing)
  - heat loads from existing buildings that can be connected to future phases of a heat network
  - major heat supply plant including opportunities to utilise heat from energy from waste plants
  - secondary heat sources, including both environmental and waste heat
  - opportunities for low and ambient temperature heat networks
  - possible land for energy centres and/or energy storage
  - possible heating and cooling network routes
  - opportunities for futureproofing utility infrastructure networks to minimise the impact from road works
  - infrastructure and land requirements for electricity and gas supplies
  - implementation options for delivering feasible projects, considering issues of procurement, funding and risk, and the role of the public sector
  - opportunities to maximise renewable electricity generation and incorporate demand-side response measures.
- Development Plans should:
  - identify the need for, and suitable sites for, any necessary energy infrastructure requirements including energy centres, energy storage and upgrades to existing infrastructure
  - identify existing heating and cooling networks, identify proposed locations for future heating and cooling networks and identify opportunities for expanding and inter-connecting existing networks as well as establishing new networks.
- Major development proposals within Heat Network Priority Areas should have a communal low-temperature heating system:
  - the heat source for the communal heating system should be selected in accordance with the following heating hierarchy:
    - connect to local existing or planned heat networks
    - use zero-emission or local secondary heat sources (in conjunction with heat pump, if required)
    - use low-emission combined heat and power (CHP) (only where there is a case for CHP to enable the delivery of an area-wide heat network, meet the development's electricity demand and provide demand response to the local electricity network)
    - use ultra-low NOx gas boilers
  - CHP and ultra-low NOx gas boiler communal or district heating systems should be designed to ensure that they meet the requirements in Part B of Policy SI 1 Improving air quality
  - where a heat network is planned but not yet in existence the development should be designed to allow for the cost-effective connection at a later date.
- Heat networks should achieve good practice design and specification standards for primary, secondary and tertiary systems comparable to those set out in the CIBSE/ADE Code of Practice CP1 or equivalent.



#### Policy SI 4 – Managing Heat Risk

- Development proposals should minimise adverse impacts on the urban heat island through design, layout, orientation, materials and the incorporation of green infrastructure.
- Major development proposals should demonstrate through an energy strategy how they will reduce the potential for internal overheating and reliance on air conditioning systems in accordance with the following cooling hierarchy:
  - reduce the amount of heat entering a building through orientation, shading, high albedo materials, fenestration, insulation and the provision of green infrastructure
  - minimise internal heat generation through energy efficient design
  - manage the heat within the building through exposed internal thermal mass and high ceilings
  - provide passive ventilation
  - provide mechanical ventilation
  - provide active cooling systems.

#### Policy SI 5 – Water infrastructure

In order to minimise the use of mains water, water supplies and resources should be protected and conserved in a sustainable manner.

Development Plans should promote improvements to water supply infrastructure to contribute to security of supply. This should be done in a timely, efficient and sustainable manner taking energy consumption into account.

Development proposals should:

- through the use of Planning Conditions minimise the use of mains water in line with the Optional Requirement of the Building Regulations (residential development), achieving mains water consumption of 105 litres or less per head per day (excluding allowance of up to five litres for external water consumption)
- achieve at least the BREEAM excellent standard for the 'Wat 01' water category or equivalent (commercial development)
- incorporate measures such as smart metering, water saving and recycling measures, including retrofitting, to help to achieve lower water consumption rates and to maximise futureproofing.

In terms of water quality, Development Plans should:

- promote the protection and improvement of the water environment in line with the Thames River Basin Management Plan, and should take account of Catchment Plans
- support wastewater treatment infrastructure investment to accommodate London's growth and climate change impacts. Such infrastructure should be constructed in a timely and sustainable manner taking account of new, smart technologies, intensification opportunities on existing sites, and energy implications. Boroughs should work with Thames Water in relation to local wastewater infrastructure requirements.

Development proposals should:

- seek to improve the water environment and ensure that adequate wastewater infrastructure capacity is provided
- take action to minimise the potential for misconnections between foul and surface water networks.

Development Plans and proposals for strategically or locally defined growth locations with particular flood risk constraints or where there is insufficient water infrastructure capacity should be informed by Integrated Water Management Strategies at an early stage.

#### Policy SI 6 – Digital connectivity infrastructure

To ensure London's global competitiveness now and in the future, development proposals should:

- ensure that sufficient ducting space for full fibre connectivity infrastructure is provided to all end users within new developments, unless an affordable alternative 1GB/s-capable connection is made available to all end users

- meet expected demand for mobile connectivity generated by the development
- take appropriate measures to avoid reducing mobile connectivity in surrounding areas; where that is not possible, any potential reduction would require mitigation
- support the effective use of rooftops and the public realm (such as street furniture and bins) to accommodate well-designed and suitably located mobile digital infrastructure.

Development Plans should support the delivery of full-fibre or equivalent digital infrastructure, with particular focus on areas with gaps in connectivity and barriers to digital access.

#### Policy SI 7 – Reducing waste and supporting the circular economy

Resource conservation, waste reduction, increases in material re-use and recycling, and reductions in waste going for disposal will be achieved by the Mayor, waste planning authorities and industry working in collaboration to:

- promote a more circular economy that improves resource efficiency and innovation to keep products and materials at their highest use for as long as possible
- encourage waste minimisation and waste prevention through the reuse of materials and using fewer resources in the production and distribution of products
- ensure that there is zero biodegradable or recyclable waste to landfill by 2026
- meet or exceed the municipal waste recycling target of 65 per cent by 2030
- meet or exceed the targets for each of the following waste and material streams:
  - construction and demolition – 95 per cent reuse/recycling/recovery
  - excavation – 95 per cent beneficial use
- design developments with adequate, flexible, and easily accessible storage space and collection systems that support, as a minimum, the separate collection of dry recyclables (at least card, paper, mixed plastics, metals, glass) and food.

Referable applications should promote circular economy outcomes and aim to be net zero-waste. A Circular Economy Statement should be submitted, to demonstrate:

- how all materials arising from demolition and remediation works will be re-used and/or recycled
- how the proposal's design and construction will reduce material demands and enable building materials, components and products to be disassembled and re-used at the end of their useful life
- opportunities for managing as much waste as possible on site
- adequate and easily accessible storage space and collection systems to support recycling and re-use
- how much waste the proposal is expected to generate, and how and where the waste will be managed in accordance with the waste hierarchy
- how performance will be monitored and reported.

Development Plans that apply circular economy principles and set local lower thresholds for the application of Circular Economy Statements for development proposals are supported.

#### Policy SI 8 – Waste capacity and net waste self sufficiency

In order to manage London's waste sustainably:

- the equivalent of 100 per cent of London's waste should be managed within London (i.e. net self-sufficiency) by 2026
- existing waste management sites should be safeguarded (see Policy SI 9 Safeguarded waste sites)
- the waste management capacity of existing sites should be optimised
- new waste management sites should be provided where required
- environmental, social and economic benefits from waste and secondary materials management should be created.

Development Plans should:

- plan for identified waste needs

- identify how waste will be reduced, in line with the principles of the Circular Economy and how remaining quantum's of waste will be managed
- allocate sufficient sites, identify suitable areas, and identify waste management facilities to provide the capacity to manage the apportioned tonnages of waste, as set out in Table 9.2 - boroughs are encouraged to collaborate by pooling their apportionment requirements
- identify the following as suitable locations to manage borough waste apportionments:
  - existing waste and secondary material sites/land, particularly waste transfer facilities, with a view to maximising their capacity
  - Strategic Industrial Locations and Locally Significant Industrial Sites
  - safeguarded wharves with an existing or future potential for waste and secondary material management.

Mayoral Development Corporations must cooperate with host boroughs to meet identified waste needs.

Development proposals for materials and waste management sites are encouraged where they:

- deliver a range of complementary waste management and secondary material processing facilities on a single site
- support prolonged product life and secondary repair, refurbishment and remanufacture of materials and assets
- contribute towards renewable energy generation, especially renewable gas technologies from organic/biomass waste, and/or
- are linked to low emission combined heat and power and/or combined cooling heat and power (CHP is only acceptable where it will enable the delivery or extension of an area-wide heat network consistent with Policy SI 3 Energy Infrastructure Part D1c)

Developments proposals for new waste sites or to increase the capacity of existing sites should be evaluated against the following criteria:

- the nature of the activity, its scale and location
- effective implementation of the waste hierarchy and its contribution to London's circular economy
- achieving a positive carbon outcome (i.e. re-using and recycling high carbon content materials) resulting in significant greenhouse gas savings - all facilities generating energy from waste will need to meet, or demonstrate that steps are in place to meet, a minimum performance of 400g of CO2 equivalent per kilowatt hour of electricity produced
- the impact on amenity in surrounding areas (including but not limited to noise, odours, air quality and visual impact) - where a site is likely to produce significant air quality, dust or noise impacts, it should be fully enclosed
- the transport and environmental impacts of all vehicle movements related to the proposal - the use of renewable fuels from waste sources and the use of rail and waterway networks to transport waste should be supported

When planning for new waste sites or to increase the capacity at existing sites the following should be considered:

- job creation and social value benefits, including skills, training and apprenticeship opportunities
- local need
- accessibility of services for local communities and businesses.

#### Policy SI 12 – Flood risk management

Current and expected flood risk from all sources (as defined in paragraph 9.12.2) across London should be managed in a sustainable and cost-effective way in collaboration with the Environment Agency, the Lead Local Flood Authorities, developers and infrastructure providers.

Development Plans should use the Mayor's Regional Flood Risk Appraisal and their Strategic Flood Risk Assessment as well as Local Flood Risk Management Strategies, where necessary, to identify areas where particular and cumulative flood risk issues exist and develop actions and policy approaches aimed at reducing

these risks. Boroughs should co-operate and jointly address cross-boundary flood risk issues including with authorities outside London.

Development proposals should ensure that flood risk is minimised and mitigated, and that residual risk is addressed. This should include, where possible, making space for water and aiming for development to be set back from the banks of watercourses.

Developments Plans and development proposals should contribute to the delivery of the measures set out in Thames Estuary 2100 Plan. The Mayor will work with the Environment Agency and relevant local planning authorities, including authorities outside London, to safeguard an appropriate location for a new Thames Barrier.

Development proposals for utility services should be designed to remain operational under flood conditions and buildings should be designed for quick recovery following a flood.

Development proposals adjacent to flood defences will be required to protect the integrity of flood defences and allow access for future maintenance and upgrading. Unless exceptional circumstances are demonstrated for not doing so, development proposals should be set back from flood defences to allow for any foreseeable future maintenance and upgrades in a sustainable and cost-effective way.

Natural flood management methods should be employed in development proposals due to their multiple benefits including increasing flood storage and creating recreational areas and habitat.

#### Policy SI 13 – Sustainable drainage

Lead Local Flood Authorities should identify – through their Local Flood Risk Management Strategies and Surface Water Management Plans – areas where there are particular surface water management issues and aim to reduce these risks. Increases in surface water run-off outside these areas also need to be identified and addressed.

Development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible. There should also be a preference for green over grey features, in line with the following drainage hierarchy:

- rainwater use as a resource (for example rainwater harvesting, blue roofs for irrigation)
- rainwater infiltration to ground at or close to source
- rainwater attenuation in green infrastructure features for gradual release (for example green roofs, rain gardens)
- rainwater discharge direct to a watercourse (unless not appropriate)
- controlled rainwater discharge to a surface water sewer or drain
- controlled rainwater discharge to a combined sewer.

Development proposals for impermeable surfacing should normally be resisted unless they can be shown to be unavoidable, including on small surfaces such as front gardens and driveways.

Drainage should be designed and implemented in ways that promote multiple benefits including increased water use efficiency, improved water quality, and enhanced biodiversity, urban greening, leisure and recreation.

#### Policy T4 – Assessing and mitigating transport impacts

Development Plans and development proposals should reflect and be integrated with current and planned transport access, capacity and connectivity.

When required in accordance with national or local guidance, transport assessments/statements should be submitted with development proposals to ensure that impacts on the capacity of the transport network (including impacts on pedestrians and the cycle network), at the local, network-wide and strategic level, are fully assessed. Transport assessments should focus on embedding the Healthy Streets Approach within, and in the vicinity of, new development. Travel Plans, Parking Design and Management Plans, Construction Logistics Plans and Delivery and Servicing Plans will be required having regard to Transport for London guidance.

Where appropriate, mitigation, either through direct provision of public transport, walking and cycling facilities and highways improvements or through financial contributions, will be required to address adverse transport impacts that are identified.

Where the ability to absorb increased travel demand through active travel modes has been exhausted, existing public transport capacity is insufficient to allow for the travel generated by proposed developments, and no firm plans and funding exist for an increase in capacity to cater for the increased demand, planning permission will be contingent on the provision of necessary public transport and active travel infrastructure.

The cumulative impacts of development on public transport and the road network capacity including walking and cycling, as well as associated effects on public health, should be taken into account and mitigated.

Development proposals should not increase road danger.

#### Policy T5 – Cycling

Development Plans and development proposals should help remove barriers to cycling and create a healthy environment in which people choose to cycle. This will be achieved through:

- supporting the delivery of a London-wide network of cycle routes, with new routes and improved infrastructure
- securing the provision of appropriate levels of cycle parking which should be fit for purpose, secure and well-located. Developments should provide cycle parking at least in accordance with the minimum standards set out in Table 10.2 and Figure 10.2, ensuring that a minimum of two short-stay and two long-stay cycle parking spaces are provided where the application of the minimum standards would result in a lower provision.

Cycle parking should be designed and laid out in accordance with the guidance contained in the London Cycling Design Standards. Development proposals should demonstrate how cycle parking facilities will cater for larger cycles, including adapted cycles for disabled people.

Development Plans requiring more generous provision of cycle parking based on local evidence will be supported.

Where it is not possible to provide suitable short-stay cycle parking off the public highway, the borough should work with stakeholders to identify an appropriate on-street location for the required provision. This may mean the reallocation of space from other uses such as on-street car parking. Alternatively, in town centres, adding the required provision to general town centre cycle parking is also acceptable. In such cases, a commuted sum should be paid to the local authority to secure provision.

Where it is not possible to provide adequate cycle parking within residential developments, boroughs must work with developers to propose alternative solutions which meet the objectives of the standards. These may include options such as providing spaces in secure, conveniently located, on-street parking facilities such as bicycle hangers.

Where the use class of a development is not fixed at the point of application, the highest potential applicable cycle parking standard should be applied.

#### Policy T7 – Deliveries, servicing and construction

Development plans and development proposals should facilitate sustainable freight movement by rail, waterways and road.

Development Plans, Opportunity Area Planning Frameworks, Area Action Plans and other area-based plans should include freight strategies. These should seek to:

- reduce freight trips to, from and within these areas
- coordinate the provision of infrastructure and facilities to manage freight at an area-wide level

- reduce road danger, noise and emissions from freight, such as through the use of safer vehicles, sustainable last-mile schemes and the provision of rapid electric vehicle charging points for freight vehicles.

To support carbon-free travel from 2050, the provision of hydrogen refuelling stations and rapid electric vehicle charging points at logistics and industrial locations is supported.

Development Plans should safeguard railheads unless it can be demonstrated that a railhead is no longer viable or capable of being made viable for rail-based freight-handling. The factors to consider in assessing the viability of a railhead include:

- Planning history, environmental impact and its relationship to surrounding land use context – recognising that the Agent of Change principle will apply
- Location, proximity to the strategic road network and existing/potential markets
- The existing and potential contribution the railhead can make towards catering for freight movements by non-road modes
- The location and availability of capacity at alternate railheads, in light of current and projected capacity and market demands.

Consolidation and distribution sites at all scales should be designed to enable 24-hour operation to encourage and support out-of-peak deliveries.

Development proposals for new consolidation and distribution facilities should be supported provided that they do not cause unacceptable impacts on London's strategic road networks and:

- reduce road danger, noise and emissions from freight trips
- enable sustainable last-mile movements, including by cycle and electric vehicle
- deliver mode shift from road to water or rail where possible (without adversely impacting existing or planned passenger services).

Development proposals should facilitate safe, clean, and efficient deliveries and servicing. Provision of adequate space for servicing, storage and deliveries should be made off-street, with on-street loading bays only used where this is not possible. Construction Logistics Plans and Delivery and Servicing Plans will be required and should be developed in accordance with Transport for London guidance and in a way which reflects the scale and complexities of developments.

Developments should be designed and managed so that deliveries can be received outside of peak hours and in the evening or night-time. Appropriate facilities are required to minimise additional freight trips arising from missed deliveries and thus facilitate efficient online retailing.

At large developments, facilities to enable micro-consolidation should be provided, with management arrangements set out in Delivery and Servicing Plans.

Development proposals must consider the use of rail/water for the transportation of material and adopt construction site design standards that enable the use of safer, lower trucks with increased levels of direct vision on waste and landfill sites, tip sites, transfer stations and construction sites.

During the construction phase of development, inclusive and safe access for people walking or cycling should be prioritised and maintained at all times.

### Local Policy.

#### Tower Hamlets Local Plan 2031 (2020)

The project will meet and exceed the key targets set out in Tower Hamlets Local Plan 2031, including but not limited to:

- D.ES7: A zero carbon borough
- S.TR1: Sustainable travel
- D.SG3: Health impact assessments
- D.ES2: Air quality
- D.ES9: Noise and vibration
- D.ES10: Overheating
- S.ES1: Protecting and enhancing environment
- D.ES3 Urban greening and biodiversity
- D.ES4: Flood risk
- D.ES5: Sustainable drainage
- D.ES6: Sustainable water and wastewater management
- D.DH2: Attractive streets, spaces and public realm
- D.OWS3: Open space and green grid networks

#### Sustainable Design and Construction Supplementary Planning Guidance (2016)

A number of sustainable design measures are suitable for all typologies and as such need to be considered and incorporated as standard for all development typologies on major applications. These include:

- Fabric first - improve fabric efficiency, quality and durability of buildings before all other measures.
- Transport - maximise links to public transport, provide cycle storage, car charging points and facilitate pedestrian desire lines.
- Urban Greening - increase biodiversity wherever possible, provision of areas for food growing and composting.
- Rainwater capture - avoid using potable water for irrigation and investigate the opportunity for gravity fed rainwater systems.
- 'Secured by Design'.
- Passive heating and cooling - prioritise zero or low energy measures to heat and cool the development over non passive systems.
- Provide ventilation and thermal comfort strategies at application stage.
- Building Management Systems - where feasible incorporate a BMS, and ensure the occupant/management is trained in its use and the system is user friendly.
- Design out waste and minimise resource use - work with the designers and contractors to reduce construction waste and recycle materials for re-use wherever possible.
- Permeable hard landscaping - absorbent and porous materials to be specified in all cases.
- Low Carbon/Communal Heating systems/Decentralised Energy - ensure that plant room is oversized to allow future connectivity, and act as anchor for future developments.



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