

East Village Plot N18/19

RESERVED MATTERS APPLICATION

Environmental Compliance Statement

Stratford Village Property Holdings 1 (SVPH1) & Stratford Village Property Holdings 2 (SVPH2)

February 2023

Stratford Village Property Holdings 1 (SVPH1) and Stratford Village Property Holdings 2 (SVPH2)

Plot N18 and N19

Environmental Compliance Statement

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1. Introduction

1.1 Introduction

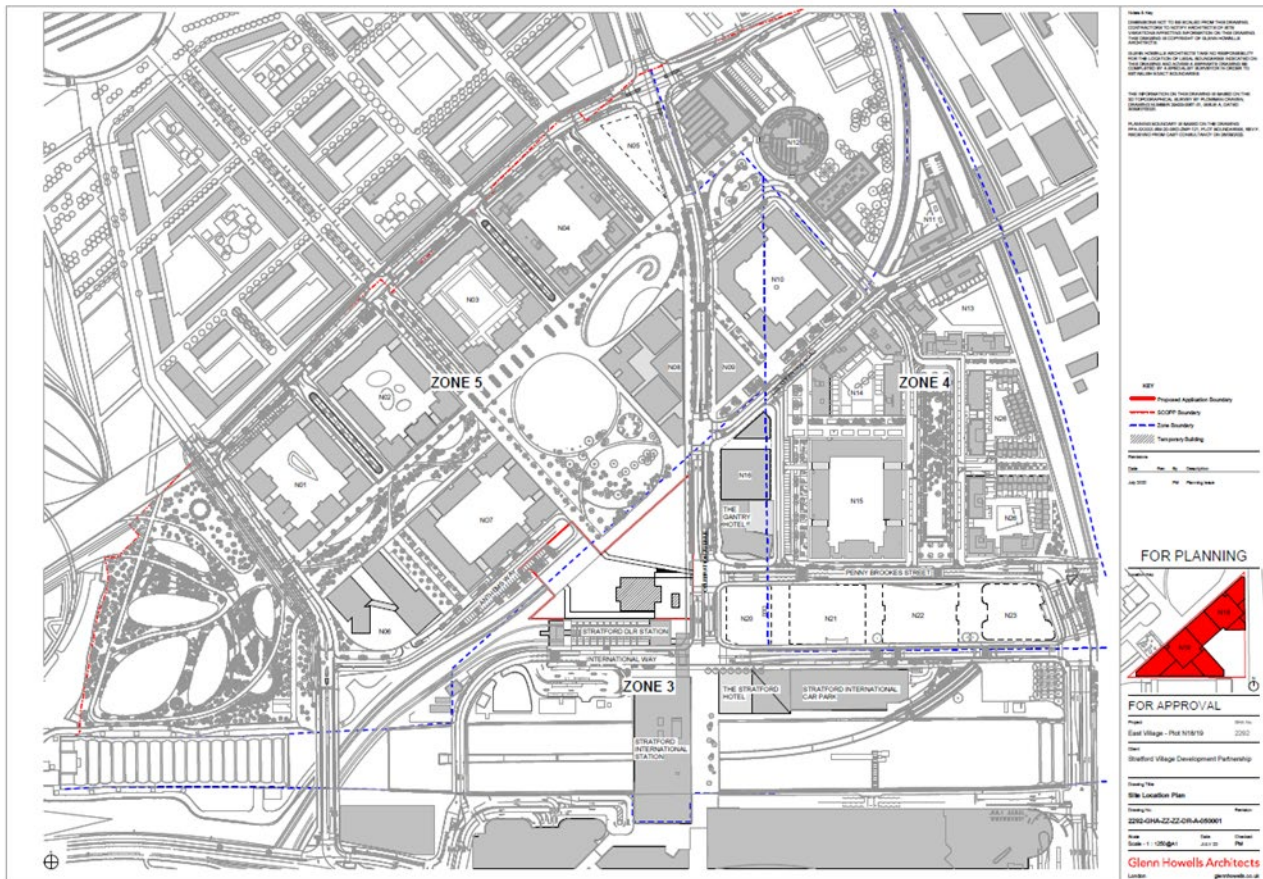
This Environmental Compliance Statement ('ECS') has been prepared by Ove Arup & Partners Ltd ('Arup') on behalf of Stratford Village Property Holdings 1 (SVPH1) and Stratford Village Property Holdings 2 (SVPH2) (the 'Applicant') to accompany a Reserved Matters Application ('RMA') for predominantly residential development for Plots N18 and N19 ('the Proposed Development') (the Proposed Development is described further in Section 3).

The RMA proposals for Plots N18/19 encompass a triangular shaped plot located in East Village on the Celebration Avenue approach to Stratford International Station and is approximately 0.97ha in size ('the Site'). The Site location and surrounding context is presented in Figure 1 below. The Site is located within East Village, which comprises land in Zones 3, 4, 5 and 6. The Site is located at Ordnance Survey National Grid Reference: Easting: 538168, Northing: 184925. The Site is on the Celebration Avenue approach to Stratford International Station and is approximately 9,694 sqm (0.97 hectares). The Proposed Development is located predominately within Zone 3, except for a small area of the Site which is currently occupied by part of the NEAP (the NEAP is located partly within the Site and to the immediate northwest of the Site and above the High Meads Loop Enclosure) which is located within Zone 5 of the of the Outline Planning Permission (the 'SC OPP') (ref: 10/90641/EXTODA). The Site is situated within the London Legacy Development Corporation ('LLDC') boundary.

The Proposed Development comprises two tower blocks, with two podium blocks on each tower, all of which are largely residential accommodation with some retail space provided at ground floor level.

The Site comprises one of the last remaining vacant development Plots within East Village and is currently occupied by Get Living's management suite.

Figure 1: Site location and surrounding context (Plots N18/19 denoted by red line boundary) (Glen Howells Architects)



The proposed details contained within the RMA have been informed by the relevant parameters and principles of the SC OPP. The proposals are in general conformity with those principles thereby ensuring that it does not undermine or prejudice the comprehensive redevelopment of SC.

This ECS assesses the detailed RMA proposals for compliance with the environmental requirements for reserved matters submissions set out in the SC OPP.

The scope of the assessments and scenarios contained therein have been discussed and agreed with the LLDC and their environmental advisors in advance of this submission.

An Environmental Screening Letter to assess potential changes to the significant effects identified in the ES for the consented SC OPP that could arise from this RMA has been submitted under separate correspondence to the LLDC.

1.2 Planning strategy in conjunction with Plot N16

Plot N18 and N19 are also occupied by a temporary building that accommodates Stratford Village Property Holdings' main lettings and management suite. That permission expires in March 2023 (ref: 13/00044/FUL). Plot N16 is currently occupied by retail and leisure uses for a temporary period until June 2023 (ref: 13/00140/REM).

Both N16 and N18 and N19 Plots benefit from extant RMAs for primarily residential uses (with non-residential uses at ground floor) which are consistent with the SC OPP (N16 ref: 14/00056/REM). Under the SC OPP, all of the consented floorspace would be taken up if both Plots were built to the existing consented massing and height parameters. Both RMAs are capable of implementation but neither have been implemented to date.

The Applicant has undertaken a review of the remaining development Plots at East Village to explore ways in which the remaining development (i.e. Plots N16 and N18/N19, all of which sit within part of Zone 3 of the overarching SC OPP (reference: 10/90641/EXTODA) could be delivered.

The planning strategy has been discussed and agreed through pre-application consultation with the LLDC Planning Policy and Decisions Team ('PPDT'). The agreed planning strategy will result in all of the remaining residential floorspace within Zone 3 being absorbed by Plot N18/N19 (and be the subject of a new reserved matters application ('RMA') pursuant to the SC OPP). This would then allow Plot N16 to be progressed as a new standalone detailed planning application independent of the SC OPP.

In order to implement this planning strategy, Plot N16 will need to be removed from the current SC OPP (i.e. slotted out) as part of a separate planning application. It is intended that this would occur at the same time as the new Plot N16 planning application is submitted, allowing the changes to be considered by LLDC PPDT at the same time with a full understanding of the proposals for the development of both Plot N16 and Plots N18/N19. This will require the submission of a suite of interrelated applications to be submitted concurrently as follows:

Plots N18/N19

- A new RMA pursuant to the SC OPP for a predominantly residential development;
- An application under S96A of the Town and Country Planning Act (1990) (as amended) ('TCPA') for NMA to the SC OPP associated with the Plot N18/N19 RMA; and
- An approval of details application pursuant to Condition C1 of the SC OPP to update the Site Wide Housing Strategy.

Plot N16

- A standalone detailed planning application for Plot N16 for purpose-built student accommodation;
- An application under S96A of the TCPA 1990 (as amended) to remove Plot N16 from the SC OPP; and

- An approval of details application pursuant to Condition A1 of the SC OPP to update the previously approved Zonal Masterplan (ZMP) for Zones 3-6. This will remove Plot N16 from the ZMP (consistent with the S96A application).

Public Realm at Victory Park/Belvedere

- A new detailed planning application that will be standalone from the SC OPP.

1.3 Report Structure

Section 2 sets out the history of the various applications made within the East Village including references to updates the Zonal Masterplan ('ZMP') and a previous unimplemented RMA specifically for Plots N18 and N19. It also sets the context for how the proposed design sits within the existing project's EIA framework.

Section 3 describes the characteristics of the Proposed Development design and how it varies from the SC OPP and subsequent RMAs. It also describes how the characteristics of the development are defined in SC OPP, by means of planning conditions and the changes that have occurred since the original consent was granted.

Section 4 details the planning conditions which apply to the RMA alongside a narrative of how the design is compliant with those conditions.

2. Planning history, recent amendments and proposals and current use

2.1 Planning history of the site

The Site (plots N18/N19) has been subject to various applications and subsequent variations since permission was granted for the SC OPP. The following sections outline the relevant planning applications and permissions pertaining to the Proposed Development in order to provide a historical planning context for the site.

2.1.1 Summary of the SC OPP

Outline planning permission for the SC OPP was granted on 17th February 2005 (reference P/03/0607) (the "First Planning Permission") by the then Local Planning Authority (LPA), the London Borough of Newham (LBN), for the:

"Comprehensive mixed use development of rail lands site comprising B1 offices, residential, retail development in the full range of A1, A2 and A3 uses, commercial leisure uses, hotels and conference facilities, community, health and education facilities, open space, landscaping, water features, parking, transport interchanges, associated infrastructure and a town centre link."

For the purpose of EIA, the outline planning application divided the SC site into 7 Zones, between which the floorspace approved in the application was distributed.

The SC OPP was granted subject to a detailed Section 106 Agreement and a number of planning conditions and also accompanied by an Environmental Statement. The conditions included Condition A1 which prevents the submission of reserved matters applications within any zone at SC until a ZMP for that zone had been submitted to, and approved by, the Local Planning Authority. Condition A3 required all ZMPs to contain the information set out in the ZMP Specification at Schedule 1 of the planning consent.

Subsequently, a number of applications have been made to specify in more detail the characteristics of the SC development in the form of ZMPs (and subsequent addendums) and RMAs, which, subsequent to consideration and approval by the planning authority have led to the build out of much of the development.

Numerous revisions were subsequently made to zonal masterplans and parameter plans between 2005 and 2009 to account for design changes as well as changes to the development specification. A full planning

history of changes across the SC site can be found in Section 5 of the SC 2010 Environmental Statement Update referred to below.

Whilst all matters were reserved, a number of controls were imposed that determine the approach to the implementation of the SC OPP which include approved Parameter Plans, planning conditions and also Section 106 obligations.

- **Parameter Plans:** all RMAs are required to be in strict accordance with the Parameter Plans (as required by Condition D9) which relate to matters such as development heights, access and circulation and open space. Approval to deviate from the parameters set out within the parameter plans can be sought (via Condition D9A) if it can be demonstrated that the deviation is unlikely to give rise to any new or different environmental effects;
- **Site Wide Strategies (SWS):** that address the topics of sustainable design, estate management, construction method, air quality and housing have been submitted and approved by the Local Planning Authority (LPA) Olympic Delivery Association (ODA) Planning Delivery Team (PDT) pursuant to Condition C1 of the SC OPP. Condition C3 requires all works to be carried out in accordance with the approved site wide strategies, unless otherwise agreed in writing;
- **Zonal Masterplan (ZMP):** Condition A1 of the outline consent precludes the submission of reserved matters until a ZMP for the zone has been approved. Separate ZMPs have been submitted to and approved by the then LPA for Zone 1; Zone 2 and Zones 3-6 (inclusive). The Zones 3- 6 ZMP was initially approved in May 2008 (ref: 07/90208/AODODA), the most recent update for which was approved in March 2014 (ref:14/00010/AOD). Condition A4 states that all RMAs must be in accordance with the ZMP, which includes (within specified limits of deviation) specification of plots, routes and the distribution of ground floor uses together with text setting the context for various open spaces, unless otherwise agreed with the LPA; and
- **Reserved Matters Application (RMA):** The SC OPP assumes that detailed consent for the individual components of SC will be secured via the submission and approval of RMAs. Such applications have been made pursuant to (most notably) Conditions B1 and B8 of the SC OPP. Whilst the bullet points above set the parameters and thresholds for the development, the submission of RMAs will demonstrate how the detailed design of each building/component of the scheme comply with those requirements.

2.1.2 Amendments to the SC OPP

The SC OPP was re-issued in 2007 following the submission of two minor material amendment applications under Section 73 of the TCPA ('S73') (refs: 06/90017/VARODA (the 'Second Planning Permission') and 07/90023/VARODA (the 'Third Planning Permission').

The S73 Application relating to the Second Planning Permission ref: 06/90017/VARODA states:

"Application to vary conditions U1, D2, D9 and D10 of planning permission P/03/0607 to allow for increased residential floorspace and density in Zone 1, and increased flexibility to make changes to parameter plans".

The applicant submitted an environmental screening request letter to LLDC for consideration which outlined that the additional development proposed as a result of the S73 Application relating to the Second Planning Permission (ref: 06/90017/VARODA), would not give rise to any significant effects beyond those assessed in the original Environmental Statement. A Screening Opinion was issued by LLDC on 17th July 2006 which concluded that there were no significant additional effects and that no further or revised Environmental Statement was required.

The S73 application relating to the Third Planning Permission ref: 07/90023/VARODA states:

"Application to vary conditions T4 (street block size), P11 (visible plumes from plant equipment), and K2 (g) (visible plumes – CCHP) of planning permission ref: 06/90017/VARODA".

An environmental screening report was undertaken in February 2007 which considered the potential impact of the changes proposed in the S73 application for the Third Planning Permission ref: 07/90023/VARODA

for each of the environmental topics. The screening report concluded that a further Environmental Impact Assessment (EIA) and ES did not need to be provided in support of the Section 73 application for the Third Planning Permission. A negative screening opinion was issued by LLDC in 2007.

A further Section 73 application was submitted in 2010 to vary conditions attached to the SC OPP and subsequently approved on 30 March 2012 (ref: 10/90651/VARODA and the “Fourth Planning Permission”). The description of development for the Fourth Planning Permission states:

“Application to vary conditions A1, A4, D2, U1, U3, E2 and T2 of the Stratford City Outline Planning Permission 07/90023/VARODA to allow additional housing in Zones 3 and 5, changes to the open space strategy and increased flexibility to make changes to Zonal Masterplans”.

At the same time, a separate application to extend the life of the SC OPP pursuant to Article 18 of the Town and Country Planning (Development Management Procedure) (England) Order 2010 (SI 2010 No. 2184) was approved by the LPA on 30 March 2012 (ref: 10/90641/EXTODA and the “Fifth Planning Permission”). The description of development for the Fifth Planning Permission states:

“Application to vary conditions B6 and B7 of the Stratford City Outline Planning Permission 07/90023/VARODA to allow an additional 10 years to submit reserved matters and implement the development in Zone 1 (Class B1 only) and Zones 2-7 (all uses).”

Of particular relevance, the Fifth Planning Permission allows for i) applications for RMAs in respect of Zones 2-7 (the Proposed Development is located predominately within Zone 3, with a small area of landscaping located within Zone 5) to be made by 17 February 2027; and ii) development in Zones 2-7 to be begun not later than 17 February 2030 or, if later, the expiration of two years from the final approval of RMA.

The Fourth and Fifth Planning Permissions were accompanied by an update of the original SC EIA and ES to account for changes to the site brought about the implementation of ZMP and RMAs since the original consent was granted in 2005. Importantly, the update to the EIA and ES assessed the cumulative effects of other developments known at that time, and included, most notably, the Legacy Communities Scheme (LCS).

Further environmental information was submitted in January 2014 and June 2014.

The EIA/ES is now defined in the SC OPP under “AA Definitions and Interpretations” and states:

“Stratford City ES” means the Stratford City ES submitted with the planning application P/03/0607 and the further environmental information submitted in January 2014 and June 2014 [sic] together with the ES dated December 2010 and the Regulation 19 response of March 2011 submitted with application 10/90641/EXTODA and planning application 10/90651/VARODA”.

The characteristics of the SC Zone 3 development are defined in the planning consent by means of planning conditions and the Section 106 obligations¹. Condition D9 states that: *“unless otherwise agreed in writing by the Local Planning Authority, the development shall be carried out in strict accordance with the Parameter Plans”*. These Parameter Plans, along with a Development Specification were defined in the First Planning Permission granted in 2005. These elements formed the basis of the EIA carried out and were included in the SC ES Volume 1, as revised in the further information submitted in January 2014 and June 2014.

Since the grant of the SC OPP, numerous applications have been submitted which have affected the development parameters. A full planning history of the changes is provided in Section 5 and Appendix 22 of the SC ES Update of 2010.

As a result of the various changes relating to other zones, the Parameter Plans now comprise the following, which reserved matters applications under the OPP are considered against:

- Parameter Plan 1 - Post CTRL Site Plan: Rev A;

¹ The SC OPP is accompanied by a Section 106 Agreement (for the SV Land Zones 2-7) (dated 30 March 2012) and Deed of Variation (“S106 DoV” dated 25 March 2014).

- Parameter Plan 2 – Post CTRL Layout Plan: Rev A;
- Parameter Plan 3 - Stratford City Land Profiles: Rev D;
- Parameter Plan 4 - Development Zones: Rev D;
- Parameter Plan 5 - Open Space: Rev J;
- Parameter Plan 6 - Access and circulation: Rev J;
- Parameter Plan 7 - Development Heights: Rev G;
- Parameter Plan 8 - Utilities Plan (on-site): Rev C;
- Parameter Plan 9 - Utilities Plan (off-site): Rev C;
- Parameter Plan 10 - Town Centre Link: Rev D; and
- Parameter Plan 11 - Composite Drawing: Rev O.

2.2 Recent amendments and proposals

Since the approval of the Fifth Planning Permission multiple RMAs have been submitted to LLDC and relate to the remaining residential developments at East Village (RMAs have also been submitted for other parts of SC such as, but not limited to, commercial buildings at International Quarter London (IQL) South (Zone 2 of SC)). As outlined within the National Planning Practice Guidance (NPPG), the LPA must have regard to the effect of the change, in addition to previous changes made under S96A. The following provides a summary of the principal amendments that have been made to the SC OPP since 2010.

In 2014, a suite of RMAs were approved for the remaining development Plots in Zones 3 and 5, namely Plots N05, N06, N08, N16 and N18/N19. The Plots secured RMA for a total of 1,951 residential units. All units comprised market units except for Plot N05 which comprises 48 social rented units. A revised RMA for Plot N06 was also subsequently approved in 2017 (see further explanation below). All of the RMAs were approved – Plots N18/N19 on 8 July 2014 (ref: 14/00141/REM).

Plots N08 and N06 have been built and are now occupied, whilst Plot N05 is under construction. RMAs for Plots N18/N19 and N16 have not been implemented but are both still capable of implementation.

The previous RMA for Plot N18/19 secured the approval of reserved matters of layout, scale, appearance, access and landscaping pursuant to conditions B1, B8, Q1 and Q4 of the SC OPP 10/90641/EXTODA comprising the construction of buildings comprising two towers and two podium blocks with a maximum height of 147.6m AOD for the two towers (up to 36 storeys) to provide:

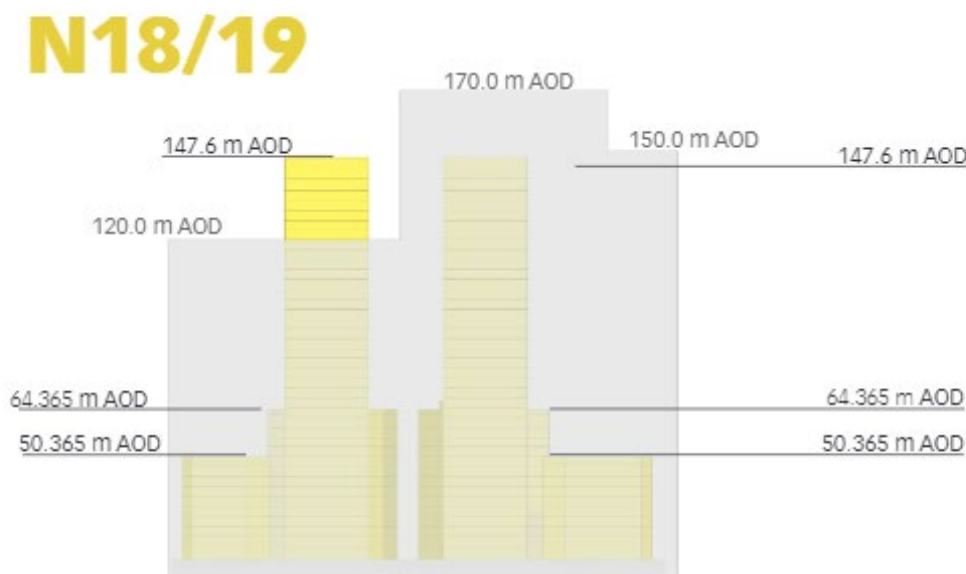
- 710 residential units;
- 1,826 sqm of complementary retail (A1-A5);
- 1,639 sqm of leisure (D1);
- Public toilet facilities;
- Building management space;
- Associated parking for cars, motorcycles, cycles and mobility scooters;
- Servicing, refuse and plant areas;
- Vehicular access from International Way including construction of a new bridge over the Docklands Light Railway box;
- Provision of private amenity spaces with hard and soft landscaping;
- Provision of public open spaces, including hard and soft landscaping and location of cycle hire docking station; and

- Alterations to existing streetscape including; - Relocation of a bus stop on north side of International Way - Construction of dropped kerbs along Anthems Way - Provision of a loading bay on Celebration Avenue Together with approval in writing to exceed the maximum height parameter as shown on Parameter Plan 7 and the Zonal Masterplan for Zones 3-6, pursuant to conditions A4 and D9/D9A of the outline planning permission.

The submission of the 2014 RMA's were also supported by a separate, albeit related a S96A application for non-material amendments to the SC OPP (Ref: 14/00143/NMA). That S96A application sought approval to deviate from the SC OPP in a limited number of instances as follows:

- Conditions D9 and D9A ('Parameter Plan') to allow Plots N08 and N18 to deviate from Parameter Plan 7 'Height Parameters'. With specific reference to Plot N18, the proposal deviated from a height parameter of 120m AOD by 27.6m (i.e. up to 147.6m AOD) as shown in Figure 2 below, taken from the Design Development Report and submitted in support of the S96A application at that time:

Figure 2: Variations to the N18/19 height parameters in 2014



- Conditions D2 and D2A ('Development Thresholds and Phasing') to allow emerging proposals for the remaining plots at East Village to exceed the residential floorspace permissible under Condition D2, whilst allowing non-residential floorspace to be redistributed between the zones. One of the main reasons for exceeding the residential floorspace was largely to accommodate internalised and shared residential amenity space i.e. it did not facilitate an increase in the overall number of residential units capable of being implemented under the SC OPP; and
- Condition U3 ('Housing') to allow minor adjustments to be made to the market housing mix to be brought forward at East Village.

In considering the application proposals at that time, the officer's report to the LLDC planning committee concluded that:

"The proposed deviations would not result in additional significant landscape character effects which were not identified in the Stratford City Update ES"

More recently a new RMA was subsequently approved for Plot N06 (ref: 17/00045/REM) on 7 June 2017. This RMA secured the approval of layout, scale, design, appearance, access and landscaping pursuant to Conditions B1, B8, B9, B10, Q1 and Q4 of the SC OPP (ref: 10/90641/EXTODA) comprising the construction of buildings up to a maximum height of +115m AOD to provide approximately 524 residential units along with complementary retail uses (Use Classes A1-A5) with associated blue badge parking, motorcycle and cycle parking, vehicular access from Olympic Park Avenue together with alterations to the existing open space along Portlands and Ravens Walk and the provision of a Local Area of Play (LAP).

At the same time a separate albeit related S96A application was submitted alongside the RMA (ref: 17/00047/NMA) subsequently approved on 7 June 2017. The S96A secured approval for:

- the transfer of 1,532 m² Gross External Area (GEA) of complementary retail floorspace from Zone 3 to Zone 4. There was no increase in the overall quantum of complementary retail floorspace authorised by the SC OPP.
- an increase of 2,299 m² residential floorspace compared to the approved N06 RMA. However, due to a surplus of 806m² residential floorspace, the net increase in “true” residential GEA of 1,493 m²; and
- an increase of 1,603 m² of complementary retail compared to the approved Plot N06 RMA.

There have also been other S96A applications seeking non-material amendments to the SC OPP within the SC site, but unrelated to East Village (i.e. outside of Zones 3-6), subsequently approved by the LLDC. These are summarised below:

- *15/00006/NMA (Zone 2)*
 - relocate the access to a Secondary Road; allow two buildings to deviate from Parameter Plan 7 ‘Height Parameters’
 - allow the community facilities floorspace to be exceeded (consistent with the requirements of a Section 106 Agreement).
- *18/00335/NMA (Zone 2 and 3)*
 - transfer of 2,000 m² Gross External Area (GEA) of leisure floorspace (converted from commercial floorspace) from Zone 3 to Zone 2. There was no increase in the overall quantum of complementary retail floorspace authorised by the SC OPP.
- *18/00336/NMA (Zone 3 and 2):*
 - transfer of 28,132 m² Gross External Area (GEA) of commercial floorspace from Zone 3 to Zone 2.
- *18/00337/NMA (Zone 2 and 4):*
 - transfer of 313 m² Gross External Area (GEA) of retail floorspace from Zone 4 to Zone 2.
 - There was no increase in the overall quantum of complementary retail floorspace authorised by the SC OPP.

2.3 Current use of Plot N18/19

A temporary planning permission has also been approved on the Site (Plot N18/19) for a temporary building that accommodates Get Living Plc’s main lettings and management suite. That permission expires in March 2023 (ref: 13/00044/FUL) and will be replaced by the Proposed Development subject to the RMA which this report accompanies.

3. Proposed Development

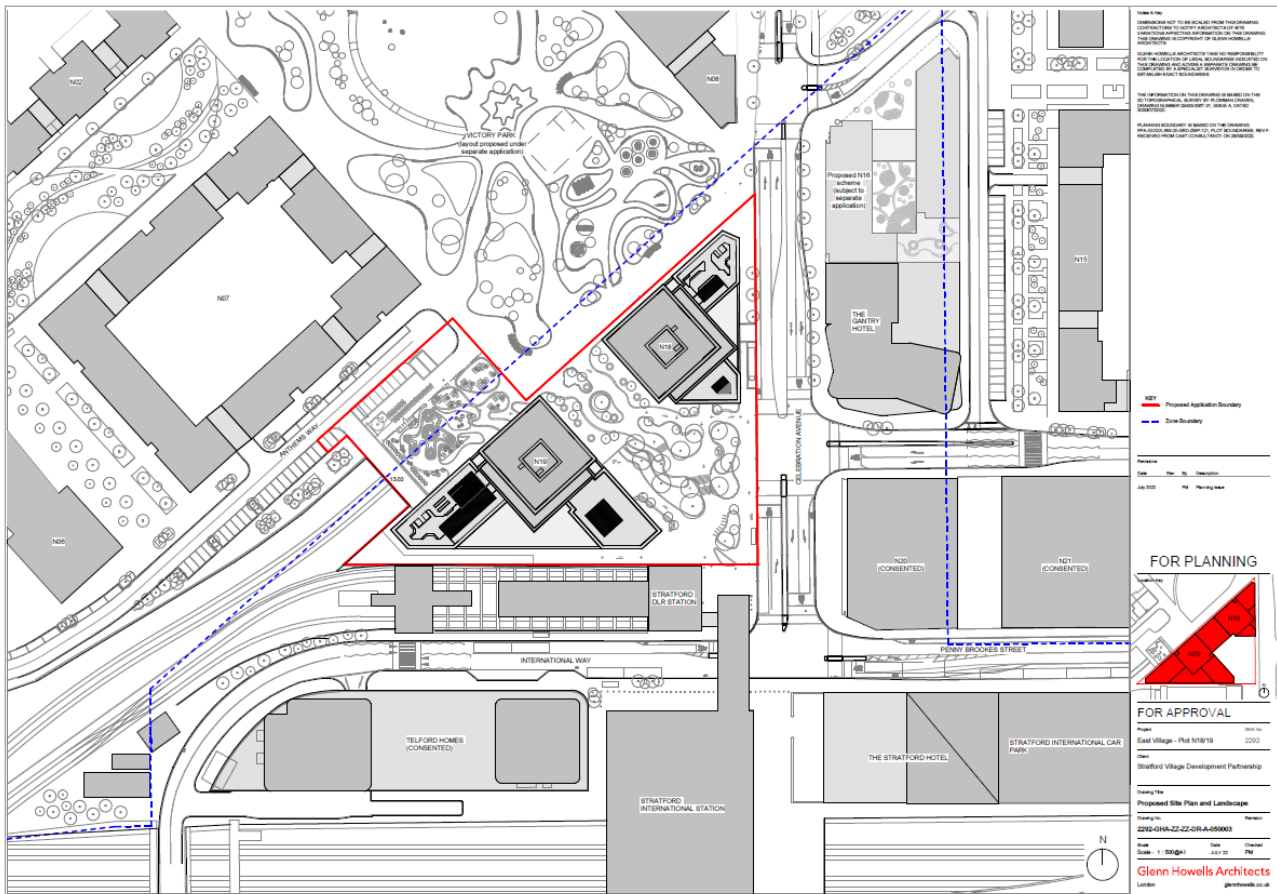
3.1 Development description

The Site location is described in Section 1.1 and shown in Figure 1.

The Proposed Development comprises two tower blocks, with two podium blocks on each tower, all of which are largely residential accommodation with some retail space provided at ground floor level.

The proposed Site Plan is provided in Figure 3 below.

Figure 3 Proposed Site Plan (Glen Howells Architects)



The N18 tower block will be 147.6m AOD in height and 39 storeys and the N19 tower block will be 132 m AOD and 34 storeys with all four podium blocks being 50.5m AOD in height. A single storey basement will be provided as part of the towers which will be 6.5m AOD in height.

A total of 848 units will be provided all of which will be market residential units broken down into the following mix:

- 84 studio apartments;
- 424 one bedroom units;
- 300 two bedroom units;
- 30 three bedroom units; and
- 10 four bedroom units.

The Proposed Development includes the provision of 875m² GEA of complimentary retail space (Use Class E (a)-(c) and Sui Generis (drinking establishments and hot food takeaways). No commercial, leisure or community floorspace is proposed.

New landscaping is being provided through the 'Gateway' area between the two buildings, consisting of trees, shrubs and rain gardens. There are also two planted roof terraces, intensive green roofs to service roofs and an extensive green roof above the podium. The Urban Greening Factor ('UGF') for the site has increased from 0.29 (existing) to 0.34 (proposed). An estimate of the UGF for the previous RMA equates to around 0.06 UGF.

The Proposed Development also results in the repurposing of the area that is currently occupied by a Neighbourhood Equipped Area of Play ('NEAP') to the immediate northwest of the Site and above the High

Meads Loop Enclosure located in Zone 5. The NEAP is being relocated as part of a separate standalone planning application (submitted concurrently) for public realm enhancements to Victory Park and the area formerly known as Belvedere. The requirements for the NEAP are consistent with the SC OPP requirements. The area currently occupied by the NEAP, and contained within this RMA, is proposed to provide vehicular access into Plots N18/N19 from Anthems Way, whilst the remainder of that space will provide more doorstep play space for the younger age group (over and above what is required by the SC OPP), thereby further supporting the proposals for N18/N19.

There will be the provision of 26 blue badge parking spaces, motorcycle parking, and the provision of 1,406 cycle parking spaces. No standard car parking spaces are proposed. Service vehicle access to the Proposed Development will be via Anthems Way, with blue badge and motorcycle access provided via Anthems Way and Celebration Avenue.

For the Proposed Development there is no back-up generator proposed but a second electrical life-safety supply and all heating and hot water will be provided by the Kings Yard Energy Centre and district heating network.

The anticipated construction start date is circa January 2024 with the works taking place in one phase and being completed by approximately February 2029. During the construction phase the site access is anticipated to be via two locations - one on Anthems Way, one on Celebration Avenue. Construction compounds are anticipated to be located on the north side of the Site, in the location of the current Anthems Way NEAP (Neighbourhood Equipped Area of Play), which will be relocated as part of the works to Victory Park. Low emission vehicles will be used throughout, where practicable.

A S96a application is being submitted concurrently to allow the proposals to deviate from the SC OPP in the following ways:

- i. Conditions D9 and D9A ('Parameter Plans') to allow emerging proposals at Plots N18/N19 to deviate from Parameter Plan 7 (relating to heights) (the application is seeking approval for the N18 tower height to be raised by 27.6mAOD to 147.6mAOD in comparison to the 120mAOD agreed for the SC OPP); and
- ii. Condition U3 ('Housing') to allow minor adjustments to be made to the market housing mix to be brought forward at East Village (the application is seeking approval for a variation to the housing mix of Zone 3 compared to the approved 2017 Site Wide Housing Strategy to increase the to increase the 1 bedroom units by 2.14%%, reduce the 2 bed units by 1.06%, reduce the 3 bed units by 1.15% and increase the 4 bed units by 0.05%).

3.2 Changes as a result of the proposed Reserved Matters Application

The following sections describe the main changes to the design of the Proposed Development to that of the previously consented scheme for Plots N18 and N19 to provide context and set out any changes that are relevant to compliance with the environmental requirements and mitigations of the SC OPP.

A separate Environmental Report submitted with a Section 96A (S96A) application relating to the Proposed Development considers whether the proposed deviations, when taken as a whole is likely to give rise to any new or different significant environmental effects that were not previously assessed in the SC OPP or subsequent revisions in the updated SC ES. The S96A will be submitted concurrently with the new RMA for the Proposed Development.

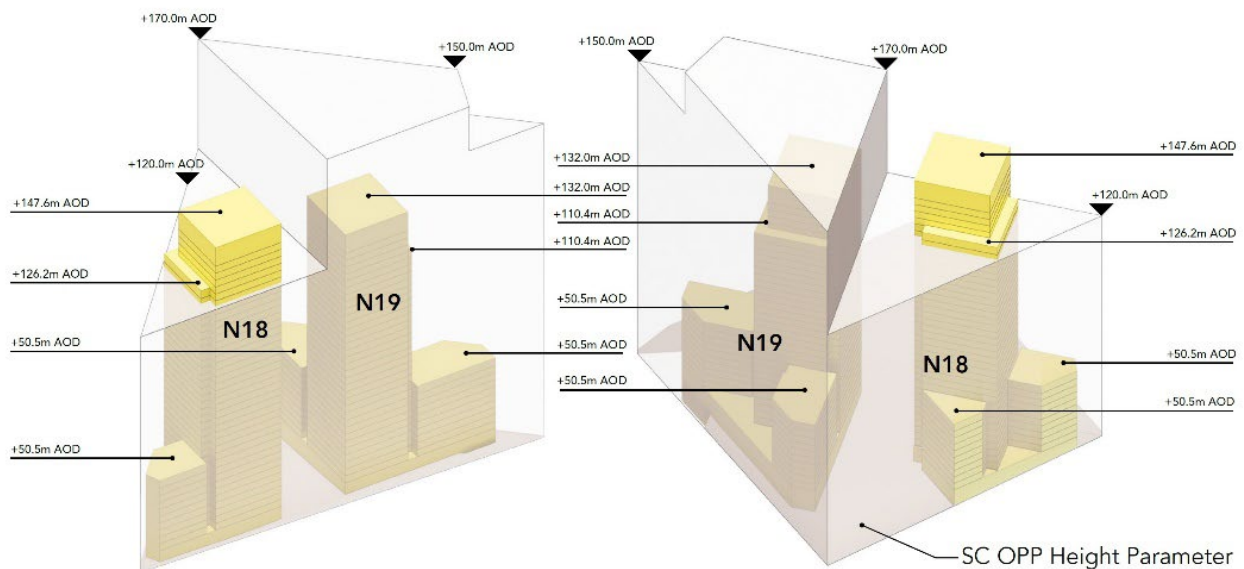
Table 1 below compares the heights of the Proposed Development to that of the approved SC OPP, and of the previously consented RMA.

Table 1: Proposed Development tower height comparisons with the approved parameter plan (Plot N18 is denoted by the yellow topped tower)

	N18 tower	N18 podium blocks	N19 tower	N19 podium blocks
Parameter Plan 7 ('Building Heights')	120m AOD	120m AOD and 170m AOD	170m AOD	170m AOD and 120m AOD
Proposed Development	147.6m AOD	50.5m AOD	132m AOD	50.5m AOD
Previously consented RMA	147.6m AOD	50.365m AOD and 63.78m AOD	147.6m AOD	50.365m AOD and 63.78m AOD

The comparison of the proposed heights with the approved parameter plan under the SC OPP is graphically shown in Figure 4 below, taken from the Design Report prepared by GHA in support of the S96A application.

Figure 4 Proposed Development tower height comparisons with the approved parameter plan (Plot N18 is denoted by the yellow topped tower)



The height of N18 does not exceed the height of the tower as approved in the approved RMA and breaches the maximum parameter height of the consented SC OPP. All other heights are compliant with the maximum parameter heights.

The basement height is compliant with that approved under the SC OPP and has been reduced by 4m in comparison to the consented RMA from 2.85mAOD to 6.5mAOD, with just one level being provided as opposed to two.

The nature of the proposed deviations are similar to those that were approved as part of the suite of RMAs approved in 2014, including that for Plots N18/N19. This approach has been deemed sound and was based on a broader master planning review of East Village to ensure a coordinated and master planned approach to height strategy. The Proposed Development does not deviate from those design principles.

East Village (or, Zones 3a, 4a, 5 and 6 of the SC OPP) represents the main residential component of the wider SC site. Originally occupied by the Athletes' Village during the 2012 Olympic and Paralympic Games, it was occupied by its first permanent residents in 2013.

Plots N01, N02, N03, N04, N07, N09, N10, N11, N12, N14, N15, N25 and N26 were originally developed for the Athletes' Village and now comprises of 2,818 homes which are now occupied. Of these, 1,439 units are rent to market units, operated by Get Living. The remaining, 1,379, are predominantly affordable homes permitted under the SC OPP (comprising both social rent and intermediate units), owned by Triathlon Homes. A further 48 social rented homes are currently under construction at N05, which maximises the quantity of affordable housing for the East Village as consented within the SC OPP. As such all of the units within the Proposed Development will be market residential units only.

Condition U3 of the SC OPP sets out the market housing mix across the SC site. This has been updated over time, in line with detailed proposals for the development as it is implemented.

Condition C1 of the SC OPP requires that a series of Site Wide Strategies are submitted and approved prior to the approval of any Zonal Masterplan (ZMP) or RMA.

Condition C1 (e) requires the submission of a SWHS. The current SWHS was approved in May 2014 and follows a number of updates to the original SWHS (which was approved on 27 November 2007 (ref: 07/90006/AODODA) and subsequent updates in July 2009, October 2013 and January 2014 (ref: 13/00422/AODODA) respectively). The latest SWHS was approved in June 2017 (ref: 17/00044/AOD).

The overall objective of the SC SWHS is to confirm how approved floorspace for SC could be distributed across the zones in order to provide a reasonable balance of housing across the whole of the SC site. The decision notice for the approved SWHS in November 2007 recognized that:

“The submitted Site Wide Housing Strategy (version 3, dated 15th June 2007) indicates that this Strategy may be revised as the development evolves. The Local Planning Authority expects any proposed amendments to this Strategy to comply with the Outline Planning Permission and the s106 agreement in providing a reasonable balance of housing across the site”.

The SWHS was informed by the market housing mix set out in Condition U3 of the SC OPP.

Table 2 below provides a more detailed analysis of the changes in Zone 3 against the approved 2017 Site Wide Housing Strategy (SWHS). The table illustrates that there is an increase in the proportion of one bed units and a decrease in proportions of both two and three bed units. If these changes are considered in relation to wider approved market housing mix across the entire SC, they do not materially alter the approved market housing.

Table 2: Approved and Proposed Market Housing Mix in Zone 3

Room Size	Approved 2017 SWHS (Zone 3)	Proposed 2022 SWHS (Zone 3)	Change by number	Change by %
1 bed (inc studios)	431 (48%)	508 (60%)	+77	+12%
2 bed	370 (41%)	300 (35%)	-70	-6%
3 bed	89 (9.9%)	30 (3.5%)	-59	-6.4%
4 bed	8 (0.9%)	10 (1.5%)	+2	+0.6%
Total	898	848	N/A	N/A

Table 3 below provides a comparison of the proposed SWHS against the market housing mix indicated within Condition U3 which relates to the entire SC development. Details of the housing mix that was previously consented as part of the extant RMA are also provided for information.

Table 3: Comparison of 2017 SWHS and proposed SWHS against Condition U3

Room Size	1 bed	2 bed	3 bed	4 bed	Total units
Proposed Development	36.15%	45.53%	15.4%	2.9%	848

Room Size	1 bed	2 bed	3 bed	4 bed	Total units
Condition U3 requirements	28%	48%	21%	3%	
Consented N18/19	34.01%	46.59%	16.55%	2.85%	710
% change between the Proposed Development SWHS and the Approved SWHS	+2.14%	-1.06%	-1.15%	+0.05%	

The number of homes being proposed is less than in the Environmental Statement that supported the SC OPP. This was also a consideration when the May 2014 SWHS and June 2017 SWHS was approved.

As explained above, a new standalone and detailed planning application is being submitted concurrently with this RMA for PBSA on Plot N16. However, in order for those proposals to be realised, Plot N16 is proposed to be removed ('slotted out') from the SC OPP (because no provision is made for PBSA in the SC OPP). This means that the remaining quantum of development will come forward on Plots N18/N19 only. The removal of Plot N16 from the SC OPP and the increase in the absorption of the floorspace into the Plot N18/N19, does not change the overall residential use being delivered under the SC OPP. However, as a result of the proposed amendments there will be changes to the housing density within Plot N18/19. Condition U1 of the SC OPP set the density levels permissible in Zones 3 as 866 units per hectare (u/ha) or 2,684 habitable rooms per hectare (hr/ha), whichever is the lesser. The proposed changes (i.e. the Proposed Development on N18/19 and considering the 'slotting out' of Plot N16) would not result in an exceedance of the density ranges set out by Condition U1 and therefore a variation to Condition U1 is not being sought. Further detailed information relating to density changes are provided in the ZMP Conformity Statement submitted in support of the RMA.

The Proposed Development includes the provision of 875m² of complimentary retail space (Class E/Sui Generis) and no commercial, community or leisure floorspace. This represents a reduction of their provisions from 1,826m² of retail and 1,639m² of leisure floorspace when compared to the consented Plot N18/N19 2014 RMA.

The previous 2014 RMA proposals were designed to achieve the standards in the London Plan (2011). However, since the RMA was approved the environmental policies and guidance have been strengthened in national and strategic policy with the latest policies set out in the London Plan (2021) seeking a higher environmental standard of design. Therefore, the Proposed Development is targeting the higher environmental standards and will result in improved environmental performance when compared to the 2014 RMA.

3.3 Development parameter plans

The characteristics of the SC Zone 3 development are defined in the SC OPP by means of planning conditions and the Section 106 Agreement. Condition D9 states that: "*unless otherwise agreed in writing by the Local Planning Authority, the development shall be carried out in strict accordance with the Parameter Plans*". These Parameter Plans, along with a Development Specification were defined in the original 2003 outline planning application. These elements formed the basis of the EIA carried out and were included in the SC ES Volume 1, as revised in the Further Information submitted in January 2014.

Since the grant of SC OPP, numerous applications have been submitted which have affected the development parameters for Plots N18 and N19. The most recently approved Parameter Plans, which accompany the RMA for this assessment, are listed at Section 2.1.2.

4. Planning conditions applied to Reserved Matters Applications

The SC OPP was granted subject to a number of planning conditions requiring the submission of environmental information with each reserved matters submission. A number of planning conditions which identify a series of items of environmental information, which must be submitted with a reserved matters submission. This report covers those items required under the following planning conditions.

4.1 A – Zonal Master Plans

Condition A4

Condition A4 requires that all reserved matters submitted shall be in accordance with the Zonal Masterplan approved for each zone pursuant to Condition A1, unless otherwise agreed in writing with the Local Planning Authority (LPA).

Applicant response

Conformity with the Zonal Masterplan (ZMP) can be found in the Plot N18/19 ZMP Conformity Statement submitted in support of the RMA.

4.2 B – Reserved Matters and Commencement of Development

Condition B11

The development (including all reserved matters and other matters submitted for approval pursuant to this permission) shall be carried out in accordance with the mitigation measures set out in the SC ES unless otherwise provided for in any of these conditions or subject to any alternative mitigation measures as may be approved in writing by the Local Planning Authority, provided that such measures do not lead to there being any significant effects other than those assessed in the Environmental Statement and further environmental information referred to in this condition.

Applicant response

The mitigation measures in the original SC ES are listed in the schedule attached in Appendix A – Schedule of ES Mitigation Measures.

As described in the separately submitted Environmental Screening statement the Plot N18 and N19 reserved matters proposals are consistent with the development which has previously been assessed. Consequently, it is concluded that the mitigation measures as set out in the SC ES continue to apply and the application will be in accordance with those mitigation measures.

4.3 C – Site Wide Strategies

Condition C3

Condition C3 states that all works shall be carried out in accordance with the approved Site Wide Strategies, unless otherwise agreed in writing by the Local Planning Authority.

Applicant response

Details of how the development complies with site wide strategies are reported in Appendix B – Site Wide Strategy Compliance.

4.4 D - Development Thresholds and Phasing

Condition D2

This condition states that all reserved matters applications, unless minor variations are agreed in writing with the Local Planning Authority, should not exceed the following floor space thresholds, as outlined in condition D2 (see Table 4).

Table 4: Primary land use quantum

Primary land use	Zones m ²							Total
	1	2	3	4	5	6	7	
Core retail	140,000	0	0	0	0	0	0	140,000
Complimentary retail	2,000	5,000	4,136	1,332	4,376	0	0	18,644
Commercial	106,236	255,267	28,132	71,338	0	0	0	461,000
Residential	99,870	29,310	106,018	111,903	273,804	0	0	620,905
Hotel	34,794	0	25,528	0	0	0	0	60,322
Leisure	35,300	0	3,924	0	1,200	0	0	40,424
Community facilities	1,905	309	0	1,187	1,111	985	0	5,497
Health Care	502	0	0	2,800		0	0	3,302
Car parking	135,000	0	22,950	0	0	0	0	157,950

Applicant response

The RMA for Plots N18 and N19 proposes 875m² of complimentary retail floorspace. This is the only complementary retail floorspace across Zone 3, which is below the 4,136m² allowance of the condition.

The total residential floorspace equates to 77,347m² which is below the 106,018m² allowance of the condition.

Condition D9

This condition cites the requirement for all reserved matters applications to be in strict accordance with the Parameter Plans, unless agreements are made in writing to the LPA with respect to Condition D10 and subject to Condition D9A.

Applicant response

The Proposed Development would be in accordance with all Parameter Plans save as identified herein/below.

The finished floor level (FFL) of the Proposed Development proposed in the current application is 6.8m AOD at the lowest Station Level, which falls marginally below the 7.0m AOD outlined in Parameter Plan 3 – Land Profiles. This minor deviation reflects the need to have entrances at different levels to meet the slope across the Site and at 0.2m will not materially affect adjacent sites or the principles or the parameter plans.

A concurrent S96a application seeks the approval to deviate from the SC OPP in a limited number of instances including Conditions D9 and D9A ('Parameter Plan'). This is to allow Plots N18/N19 to deviate from Parameter Plan 7 'Height Parameters. A Townscape, Heritage and Visual Impact Assessment is provided as part of the S96a application to support the proposed height variation and the exceedance of the height parameters for Plot N18 (see Appendix C). It is assumed, within this application, that the S96A

application will be approved and therefore this RMA considers how the Proposed Development complies with the amended conditions.

The Proposed Development would represent an enhancement to the townscape of East Village and the setting of Victory Park. While the taller N18 tower would breach the SC OPP parameters, it would do so only to the same extent as the consented RMA proposal, and this additional height, combined with the reduced height of N19, would serve to enhance the compositional quality of the development in views. The differential in height between the two proposed towers successfully creates a landmark building that signposts Victory Park, reinforces principles of the SC OPP and creates a compelling townscape arc. The height of the tallest tower is lower than Manhattan Loft Gardens, which remains East Village's tallest building. The breach to the SC OPP height parameters, which is confined to a single element of the Proposed Development (i.e. the N18 tower) is marginal, and the visual effects and the manner in which the proposals appear in long, medium and close range would generally be in keeping with the effects associated with the SC OPP parameters.

4.5 Q - Landscaping

Condition Q

Applications for Reserved Matters shall include details of open space and design and landscaping of all unbuilt areas of each zone (including items (a) to (k)) hard and soft landscape works, details of plants etc.

Applicant response

Details of hard and soft landscaping are included within the landscape drawings for the Plot N18 and N19 RMA.

4.6 V - Daylighting, Sunlighting and Microclimate

Condition V1

The developer shall demonstrate that the development has been designed to accord with the BRE Site Layout Planning for Sunlight and Daylight: A Guide to Practice and this shall be reflected in all applications for approval of reserved matters.

Applicant response

A sunlight availability study has been carried out by GIA Chartered Surveyors on the development proposals for Plots N18 and N19 in order to assess the suitability of the development in respect of sunlight (see Appendix D). The methodology used to prepare this assessment is entirely consistent with the methodology adopted in the daylight/sunlight assessments for all built Plots within the SC site. More specifically, the assessment is based on the following metrics:

Effects of the Proposed Development on the surrounding buildings: Vertical Skylight Component, Probable Annual and Winter Sunlight Hours, Sun Hours (open spaces); and

Effects of the Proposed Development on itself: Vertical Skylight Component, Probable Annual and Winter Sunlight Hours, Average Daylight Factor, No Sky Line, Sun Hours (open spaces).

The assessment scenarios which formed the basis of the report were agreed with LLDC in advance of the works with details of the assessment scenarios available in Appendix D.

The assessment concludes that the design of the massing has been carried out considering the guidelines of BRE 209 and BS 8206. A summary of the findings are provided below:

- The Proposed Development deviates from the height parameters of the SC OPP with one exceedance noted at the N18 tower. However, given that daylight, sunlight and overshadowing assessments consider the massing as a whole and not just the height parameters, this is balanced by a significant reduction in the height and massing of the N19 tower and the podium blocks associated with N18 and N19;

- Consequently, any potential additional effect of the Proposed Development beyond the parameters approved as part of the SC OPP is considered to be negligible and the overall results are likely to improve due to the plot wide height reductions;
- Comparisons between the Proposed Development and the Consented 2014 RMA show that there would be no noticeable change to daylight, sunlight and overshadowing in regard to effects upon surrounding sensitive receptors. The reduced height of the Proposed Development would result in improvements to daylight, sunlight and overshadowing levels compared to those predicted in the assessment of the previously consented RMA;
- When comparing the Proposed Development against the Consented 2014 RMA for N18/19, there would be isolated instances no skyline reductions. However, these can partially be attributed to the balcony design of the affected sensitive neighbouring buildings, which restrict daylight within the rooms; and
- Overall, it is considered that there would be no noticeable changes to daylight, sunlight and overshadowing caused by the Proposed Development when compared to the consented RMA. Therefore, the significance of effects are considered to be no greater than that which was previously approved, and the impact results are better in most instances.

The Proposed Development has been designed with consideration to the Building Research Establishment (BRE) handbook 'Site Layout Planning for Daylight and Sunlight — A Guide to Good Practice (2022)'. This is evidenced through not only the above assessment findings but also via the following:

- The daylight (VSC and NSL) and sunlight (APSH) effects of the proposed N18/19 RMA on the surrounding receptors are considered negligible compared against the consented N18/19 RMA (approved baseline);
- Approximately 45% of the windows and 14% of the rooms will experience improvements in VSC and NSL respectively, when compared to the baseline consented RMA; and
- The public open spaces surrounding the proposed 18/19 RMA development will receive greater level of sunlight when compared against the baseline consented RMA.

It is therefore concluded that the planning conditions V1 are met by the Proposed Development.

Condition V2

The developer shall demonstrate that all buildings are designed according to the guidance in BS8206 Part II and the Applications Manual: Day lighting and window design – Lighting Guide LG10 (1999) published by the Chartered Institute of Building Services Engineers, and this shall be reflected in all applications for approval of Reserved Matters.

Applicant response

Plot N18 and N19 has been designed in accordance with BS8206 Part II and the Applications Manual: Day lighting window design – Lighting Guide LG10. Further work is currently being undertaken to demonstrate compliance with V2 and will be submitted as supplementary information to LLDC when available.

Condition V3

Condition V3 states that modelling shall be carried out to demonstrate that all outdoor spaces and all buildings that are to be the subject of wind tunnel testing pursuant to Condition V4 shall be designed using the Lawson Criteria for Distress and comfort as a guide to the appropriate level of amenity that needs to be achieved.

Condition V4

The Condition states that modelling shall be carried out to identify all outdoor spaces and buildings in the relevant zone that are to be the subject of wind tunnel testing, to include (but not limited to) all buildings of more than 30 m in height.

Applicant response to conditions V3 and V4

A boundary layer wind tunnel study has been carried out to assess the wind microclimate for the proposed Plot N18 and N19, by FD Global. Full details of the wind tunnel testing are presented in Appendix D.

The assessment undertaken is based on criteria that are a UK industry standard accepted formulation of the so-called Lawson criteria and is consistent with the City of London Planning Advice Notes 'Wind Effects and Tall Buildings' dated July 2017.

The conclusions of the wind assessment are as follows:

- Safety criteria for general public is met in all locations at ground level, and all terraced and roof areas;
- At ground level and roof level, the design target comfort criteria is met for all locations;
- Significant effects are predicted at two sensitive receptors, one located at the buildings entrance of the Adaggio Aparthotel (located on Celebration Avenue) and the other is the proposed playground (receptors G91 and G8 respectively within the Microclimate assessment report), in the event that the Proposed Development is built in advance of N16 (and therefore the N16 plot is vacant);
- Both receptors require wind mitigation measures which will be to increase the height of the of the soft landscaping around the building entrance and introduce lower level greenery to the west of the playground;
- With wind mitigation measures in place, the Proposed Development has no residual impacts throughout the public realm for any of the assessment scenarios; and
- The results overall have demonstrated that despite the changes in height as outlined in Section 2, when compared to the original SC OPP, the wind impacts of the Proposed Development are not significant with wind mitigation in place. The modelling and wind tunnel testing have demonstrated that with mitigation in place (including temporary mitigation, as required, should N18/19 be constructed in advance of N16) the appropriate level of amenity will be achieved for all outdoor spaces and buildings. Evidence of this is supported by the Wind Microclimate assessment found within Appendix D.

Appendix A - Schedule of ES Mitigation Measures

Appendix B – Site Wide Strategy Compliance

Appendix C – Townscape, Heritage and Visual Impact Assessment

Appendix D – Daylight, Sunlight and Overshadowing

Appendix E – Wind and Microclimate Assessment