



BISHOPSGATE GOODSYARD 2020 PLANNING APPLICATION
RESPONSE BY RECLAIM THE GOODSYARD CAMPAIGN GROUP

Application References:

London Borough of Hackney: 2014/2427

London Borough of Tower Hamlets: PA/14/2011

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1 INTRODUCTION

This objection comes from the Reclaim the Goodsyard campaign, founded by Weavers Community Action Group in 2020. The campaign is endorsed by local community groups, including Weavers Community Action Group, Columbia Tenants and Residents Association, Friends of Arnold Circus, Jesus Hospital Estate Residents Association, Boundary Tenants and Residents Association, East End Preservation Society, East End Trades Guild, Rochelle Studios, Saint Hilda's East Community Centre, Spitalfields Trust, Federation of Tower Hamlets Tenants and Residents Associations. Some of these groups are submitting objections separately.

These groups are long-standing stakeholders in the area and many of their members, along with local individuals, have been concerned about the future of the Goodsyard for years; some involved before the current developers took on the site in 2002. While proposals and planning policy have come and gone, the community has been consulted at intervals by the Boroughs, developers and the GLA. But while we have readily responded to all consultations, our main concerns have been ignored - above all, the view that this area is not the City and must be treated as a separate, distinct place with its own character and its own needs.

Before the events of 2020 we formed the opinion that the amended application cannot be supported, for reasons that include housing, heritage, local business and the local economy, hotel provision, health and the environment. Now in the context of Covid19 and the growing climate emergency it is evident that the justification for the scheme must be reviewed. It should be withdrawn or refused so that a more responsible, realistic and exemplary solution can be found for this major site.

2 THE SITE AND ITS CONTEXT

We consider that the site occupies a crucial and pivotal position between the two historic and distinct districts of Spitalfields and Shoreditch. The Bishopsgate Goods Yard is surrounded by conservation areas which represent the rich history and character of the area in which it sits. The site possesses great character in itself, with considerable heritage significance for its Victorian railway infrastructure.

We believe that the existing character of the site is distinct and not part of the City financial business area. Despite the proximity of Broadgate, the Bishopsgate Tower, Principal Place and other commercial developments that have extended the visual presence of the City northwards, the Bishopsgate Goodsyard is a different entity which relates to the East End rather than to the City of London.

Up until now the incursion of City-type commercial development in the area east of Bishopsgate / Norton Folgate and Shoreditch High Street has been comparatively low-rise. Foster's Bishops Square, the blocks on the eastern side of Bishopsgate, British Land's Norton Folgate scheme (under construction) and the recently-completed Fruit and Wool Exchange development are not gigantic in scale. The last of these, despite accommodating a very large City legal firm, was designed to minimise its bulk and adverse impact.

We accept that the site, which has been partly abandoned and under-used for many years (though well-used by Powerleague) requires regeneration, but believe that this should be

done in a manner which respects its character and urban context and which above all serves the local community. Developers Hammerson and Ballymore have not advanced credible plans for the site in the eighteen years since they acquired the option on it, leading us to think that they are, and always have been, the wrong developers for the Goodsyrd.

3 THE CURRENT SCHEME

While the current scheme is a reduction in the previous proposals for a range of super-towers across the site, we consider that it remains an over-development of the area, with an excessive provision of commercial and retail space and an under-provision of affordable housing for local people. While lower than the previous proposals, the scale and massing of the current scheme on the western half of the site remains a highly objectionable matter which will have a widespread adverse impact.

4 IMPACT ON HERITAGE ASSETS

Within the site itself, the proposals involve radical intervention into and on top of the surviving railway viaducts, including the demolition of large parts of those structures that are not statutorily listed. We note and agree with the views and objections of the Victorian Society who are best placed to judge such matters. It is regrettable that more of the surviving fabric cannot be retained and repurposed, not least in sustainability terms. We note that concern has already been raised about the problems of waste disposal from such a huge amount of demolition. The loss of embodied energy will be very significant and must be a key concern.

The height and massing of the proposals will have an adverse impact on several conservation areas, many statutorily listed buildings and numerous non-designated heritage assets that lie close to or even some distance from the site.

We note the objections raised by Historic England in terms of the harm caused to the South Shoreditch Conservation Area and to the Boundary Estate, and we consider that the harmful impact is serious, or substantial. The Townscape and Visual Impact Assessment View 29 shows that within the consistent low-rise nature of Shoreditch High Street the tower and spire of St Leonard's church is at present the primary focus and is a landmark of the highest architectural, historic and communal significance. Its relationship with its surroundings is a key element in the significance of the character and appearance of this part of the conservation area. The proposed tower will be a very prominent intrusion and distraction to the existing character and appearance, with a major adverse impact. We would also point out that there is a continuum of views along Kingsland Road and Shoreditch High Street.

The existing Tea Building at the junction of Shoreditch High Street and Bethnal Green Road is the highest building on that side of the street, rising to nine storeys, but it will be completely overwhelmed by the scale of the proposals, as shown in View 35.

Similarly View 26, with its existing consistent parapet heights of mainly Victorian buildings lining both sides of Great Eastern Street, will be radically altered by the proposals. We completely disagree with the applicant's analysis that 'the effect is beneficial'. The applicant's claim that the tower will 'act as a beacon' and 'provide a marker at the end of the street and the direction of the City' is symptomatic of an intention to expand the physical presence of the City, which at present is completely absent in this view.

Further along Great Eastern Street, View 28 demonstrates the overbearing impact of the proposals on the Victorian listed buildings in the foreground. There are indeed empty sites offering opportunities for sympathetic development which would enhance the character and appearance of the South Shoreditch Conservation Area, but this view demonstrates that the proposals are very damaging.

In addition to Historic England's objections we consider that the proposals will have a harmful impact to the south and east of the site, including the following:

- a continuum of views along the entire length of Commercial Street, which includes the Wentworth Street Conservation Area as well as Brick Lane / Fournier Street
- a continuum of views looking westwards along Bethnal Green Road
- the view northwards from Folgate Street along Elder Street and Blossom Street, within the Elder Street Conservation Area
- views northwards from the Artillery Passage Conservation Area across Bishops Square
- views from Allen Gardens, looking westwards across Brick Lane
- views from Cheshire Street looking westwards

We conclude that the scale of the proposals will have a very harmful impact on the setting of many conservation areas in Hackney and Tower Hamlets and on the setting of dozens of listed buildings and unlisted buildings which are non-designated heritage assets, all of which the ES Built Heritage addendum has listed.

As a general observation, we consider that the applicant's consultants underestimate the degree of harm caused by the proposals. Their analysis cannot be relied upon as an independent or unbiased assessment. Their conclusions that the impacts are at the very worst "low adverse", or in the main "neutral" or "beneficial" does not tally with the advice given by expert bodies such as Historic England or the Victorian Society. While we note that various additional questions have been asked of the applicant concerning their heritage analysis as part of the Final Review Response we request that the Greater London Authority take proper independent advice in order to assess the scheme, not rely exclusively on the judgements of the applicant. The acceptability or otherwise of the proposals should not be a box-ticking exercise by the applicant.

4.1 RECENT AMENDMENTS TO THE PROPOSALS

The removal of part of the brick-arched roof of the London Road viaduct structure in order to create new openings will involve the further loss of historic fabric. Coupled with the additional demolition of brick arches in Wheler Street this represents additional erosion of the surviving Victorian heritage. The Wheler Street arch is atmospheric and a well recognised part of the fabric of the Goodsyard along the only north-south route.

The retention of Nos 71-75 Sclater Street is welcome, although the setting of these 18th century weavers' houses will be severely compromised by the adjacent development.

4.2 POLICIES AND PLANNING GUIDELINES

We are aware that existing planning policy and guidance for the Goodsyard, including the City Fringe Opportunity Area Framework and the Bishopsgate Goodsyard Planning Guidance, all assume and promote tall buildings at the western end of the site and a high level of development, with an emphasis on commercial development rather than housing.

In the radically different post-Covid social and economic climate these policies and guidance are now out-dated and out of step with reality, requiring immediate reappraisal. We believe that the proposed development violates Key Objective 1a in Tower Hamlets Local Plan which states: "Growth must contribute positively to existing identified social, economic and environmental needs".

Notwithstanding the adoption of current policy there was considerable objection from the local community during the consultation stages, which the current proposals now justify. As was reported in 2009 in the public consultation summary report on the Bishopsgate Goodsyard Interim Planning Guidance, "the local community has mixed views on the presence of tall buildings on the Bishopsgate Goodsyard site. Particular concerns were regarding local views, effect on daylight availability, impact on microclimates, and the overall impact of tall buildings on the local area". We retain and restate these strong concerns.

It was noted in paragraph 2.61 of the Bishopsgate Goodsyard Interim Planning Guidance (IPG) 2010 that "buildings will need to be carefully designed with regard to mitigating the possible negative effects as highlighted by the public consultation comments." In the current scheme these design considerations have been ignored, with resulting negative impacts such as loss of light acknowledged in the Residual Effects report. The applicant tries to downgrade the weight of the IPG by saying it was published nine years ago (Planning Statement para 6.27). By this logic their application must be broadly out of date, given that its concept masterplanning began more than seven years ago.

Other guidance in the Bishopsgate Goodsyard IPG that has been completely ignored in the current proposals includes:

- Future development of the goods yard will need to preserve or enhance the character and appearance of the adjoining conservation areas;
- Ensure new development on the site integrates with the surrounding area, taking into account local character;
- Ensure that any development proposals fit within the strategic and local planning context, are sustainable and maximise benefits to the local community;
- In paragraph 2.63 "Design Guideline for Tall Buildings": "tall buildings should be set back from the edge of the site to allow a transition between the scale of new and existing buildings", and "tall buildings should be set back on a podium. The podium level should be designed to relate to the existing building heights of the surrounding context, to create a human-scale architecture that relates to existing streetscape".
- Orientation of the blocks to ensure that there is not a wall of development along the northern site edge and to allow sunshine into the site from the south. The current proposals disregard this advice and instead create a massive, over-scaled and unrelieved wall of development along Bethnal Green Road on plot 1.
- The Guidelines intended a new civic space to be created within the commercial buildings near the station at the western end, but this does not form part of the

proposals. Even in such a large scheme there is no meaningful gathering space at ground level, the 'public realm' is more a collection of passageways between tall buildings. This fails to meet Tower Hamlets policy for sustainable growth S.DH2 c. "providing a range of public spaces that can function as places for social gatherings and other recreational uses."

The recently adopted Hackney Local Plan includes a supplement titled "Future Shoreditch" which states with reference to the Goodsyards: "Building heights should respect the prevailing building heights along Shoreditch High Street". It is accompanied by an indicative massing diagram which clearly shows the Tea Building as the key mass and height anchor for the western end of the site. Yet in the proposed application, Plot 1 opposite the Tea Building extends to over twice its height with a staggering bulk enclosing the boxed-over railway line. Plot 2 - at 142m and with considerable bulk - is also contrary to this massing guideline.

4.3 DEGREE OF HARM

The National Planning Policy Framework identifies two categories of harm to heritage assets, 'substantial' and 'less than substantial'. An important test for finding substantial harm is whether a key element of significance of a heritage asset is badly or seriously damaged. The word 'serious' has been held to mean the same as 'substantial' in the Bedford case.

We submit that the height and massing of the proposed new buildings will have a major adverse impact on the fundamental character and appearance of the existing site and the adjoining conservation areas in terms of challenging their existing prevailing scale and grain. These tall new buildings are so different in scale to their surrounding context, and will so dominate the townscape that a key element of the significance of the existing conservation areas will be radically undermined. We consider that this amounts to substantial harm.

We do not agree that if the new buildings were considered to be well designed this mitigates their harmful impact. Good design is a requirement of any new building, large or small. In any event it is an inexact and largely subjective science as to what constitutes a well designed tower. The physical presence and visibility of the buildings remains a critical issue.

Were it to be held that each individual harmful impact identified amounted to 'less than substantial' harm, the question would arise as to whether the cumulative impact of so many instances of harm results in substantial harm. We would say that it does.

4.4 BALANCING HARM AGAINST PUBLIC BENEFITS

The National Planning Policy Framework requires in paragraphs 195 and 196 that where proposed development will lead to either substantial or less than substantial harm to designated heritage assets, a balance has to be struck between the harm that is caused and the public benefits that are achieved. Paragraph 193 also requires that when considering the impact of a proposed development on the significance of a designated heritage asset great weight should be given to the asset's conservation, and the more important the asset the greater the weight should be.

4.5 ASSESSMENT OF PUBLIC BENEFITS

We consider that the public benefits provided by the scheme are insufficient and a lost opportunity for such a large site. In particular we consider that:

- the provision of only 90 social rented homes is derisory, given the size of the site and the high demand for genuinely affordable housing in Hackney and Tower Hamlets
- much of the new public space is related to commercial offices and high-end retail and has not been designed with the local residential population in mind
- the quality of much of the new public realm, including the green space on the viaduct and the existing public realm on adjoining streets, will be reduced and overshadowed by the scale of development
- good design is a standard requirement of any scheme and not in itself a public benefit, or a mitigating factor. Furthermore we would suggest that the proposed and indicative design of the large blocks at the western end of the site is questionable, showing little evidence of fitting with the local context. These are designs for buildings that could be located anywhere, in Vauxhall / Nine Elms, Houston or Dubai.

4.6 OPTIMUM VIABLE USE

Paragraph 196 of the National Planning Policy Framework requires that when balancing harm against public benefit consideration should be given to the optimum viable use of the heritage asset. We believe that an alternative scheme might provide equivalent or greater public benefits which would also cause less harm to heritage assets.

In the current and evolving post-Covid19 economic climate there must be great uncertainty about the viability of a scheme of this scale, particularly the office and retail elements whose occupation would rely upon large numbers of people travelling into the area. The scheme relies on an economic model of high growth and floorspace demand in these commercial sectors. The proposals seem over-ambitious and if given consent present a high risk that the site would be left empty and potentially blighted for many more years to come, particularly if an excessive price has been paid for the land.

We believe that the needs and opportunities for retail expansion already exist within the Brick Lane, Old Truman Brewery, Spitalfields Market and Wentworth Street areas. Existing retail uses are already struggling in these areas. We consider that the Goodsyrd is by now not an appropriate or vital location for corporate offices and retail at this scale.

A lower scale, less expensive and less ambitious alternative, predicated on local community needs in terms of living, working and leisure-related uses should be explored. Such an alternative scheme might involve retention of far more of the existing viaduct structures on the site and their conversion into affordable business space. It might involve the construction of light-weight residential units above these existing structures, focussed on meeting local needs for social housing and community facilities.

In conclusion we consider that the public benefits offered by the scheme are not of such exceptional merit that they would come close to outweighing the heritage harm that arises.

5 HOUSING MIX

The Bishopsgate Goodsyrd Planning Statement refers to the site's "strategic importance" for London, but fails to adequately address the most important issue for Londoners – housing. This was true at the time it was written and submitted, but, as stated above, the situation has now changed to a point where the entire project should be re-evaluated, particularly with a view to housing provision.

The full implications of COVID-19 are unknown. But it would be absurd to consider this Planning Statement and the future of the site, as though COVID-19 has not happened! At least three provisional, general assumptions can be made:

1. demand for commercial office space and ancillary retail/leisure services is likely to reduce;
2. the housing market will continue to be volatile, but favour those with higher incomes;
3. demand for non-market rented housing (i.e. council housing) for those on low and medium incomes will increase, particularly in Tower Hamlets and Hackney (with a current combined waiting list for such homes of approximately 40,000).

The Planning Statement takes no account of these critical issues. In particular, the revised scheme reduces the number of homes from 1,356 to a maximum of 500, in favour of increasing the allocation of office, retail and hotel space. This is a fundamental flaw in the proposal and should be reviewed by the Mayor of London to take account of highly significant changes in the planning and policy landscape.

Even allowing for the unforeseeable impacts of C-19, the Planning Statement's housing elements are based on vague notions of the implementation schedule, which over a period of ten years is impossible to guarantee, offering parameters for housing provision that range from 346 to 500 new homes. It is impossible to see how elected politicians can make an informed judgment about the merits of the scheme based on these unknowns.

However, in the maximum and minimum scenarios presented, only 18% of the new homes would be for social rent. This is woefully inadequate and does not address evidenced housing need as required by the aims of policy H4 in the unpublished London Plan and 3.11 in the current London Plan which requires 150 social rented homes from a total of 250 "affordable".

Furthermore, it is noticeable that the Planning Statement refers to "Low Cost Rent" - a term used in the new London Plan - without defining whether this means Social Rent or the more expensive London Affordable Rent. It should be noted that Tower Hamlets in its Strategic Housing Market Assessment 2017 states at 5.36: "...Even though Tower Hamlets Living Rents are below both London Living Rents and Affordable Rents, the vast majority of households who require affordable housing will still not be able to afford to meet the costs of its rents."

In another departure from policy, the housing mix is disproportionately skewed towards one-bedroom flats, proposed as constituting over half the new homes on the site. Tower Hamlets Local Plan D.H2 specifies housing unit size mix of 30% 1-bed, 50% 2-bed and 20% 3+ bed housing mix for private tenure. This is flatly ignored in the planning application which proposes 77% 1-bed, 23% 2-bed and no 3+ bedroom homes on the private part of the

tenure mix, betraying an absence of any true attempt at community-building within the development.

This does not reflect the level of demand for family-sized homes in Tower Hamlets and opens the strong possibility of homes being used for short-term lets like Airbnb, which has become increasingly evident at similar developments in the area, demonstrating again that the application's approach to new development does not contribute adequately towards the urgency of reducing housing need or help to create strong communities.

Other unknowns are wrapped up in the implementation plan. The first housing blocks are not due to complete until 2025 - approximately 120 homes, tenure unspecified. The next tranche of homes not delivered until 2030, and final homes not until 2032. In all cases the tenure at each delivery point is unspecified as far as we can tell from the documents.

6 SMALL INDEPENDENT BUSINESS, LOCAL EMPLOYMENT

There has been no study of the local business and employment landscape for the purpose of providing workspace and retail space of a kind that is needed locally, on this large site. It is not sufficient to count employment in terms of construction jobs, which are temporary and never a guarantee of significant local employment.

Small / local / independent / creative businesses and entrepreneurs have contributed to the area's distinctiveness alongside its architecture and heritage, making it a major attraction and a unique success through the work of individuals. But as the East End Trades Guild has said, large-scale developments of this kind can kill off diversity of economy through increasing land values that in turn raise local rents, displacing even the most viable of small businesses. With this demise the unique attraction of the area may decline, with a loss to the economy and London's economy as a whole.

Community groups for years have asked for the local economy to be recognised in policy, particularly when the City Fringe Opportunity Area was drawn up by the GLA. Instead, the economic needs of major developers and the City have been prioritised. In the application this is reflected in the claim that "New developments such as 'The Stage' and 'Principal Place' are in close proximity and 'The Goodsyard' will complement the overall regeneration of the area." (Planning Statement 1.2.13) It seems Regeneration is only understood in terms of tall buildings and their accompanying rental values.

The Retail Study gives some credit to independent and small businesses in that they will serve to attract custom to their development but there seems to be little understanding of the sector and the application contains no mention of affordable retail space.

The 10% affordable workspace has been provided in the office buildings. While small tech are important, this affordable space cannot be taken by other businesses needing different kinds of employment space, such as light industrial uses. The Goodsyard presents an ideal opportunity to repurpose some of the arches as light industrial workspaces, but the arches are intended only for upscale retail in the plans.

We consider that new LP GG1D has not been followed in this application: "seek to ensure that London continues to generate a wide range of economic and other opportunities, and

that everyone is able to benefit from these to ensure that London is a fairer, more inclusive and more equal city.”

7 HOTEL SATURATION AND AIRBNB

If the current application is approved - or indeed other nearby pending applications for hotel approval - it will redefine the area as a hotel district that no policy, local or London-wide, has determined it should be. It will result in an unplanned and harmful effect on the character of the area as a whole. A similar mistake was made in Lambeth some years ago, wherein Waterloo became a hotel district through the sheer volume of applications submitted by developers, which was not reflected in planning policy.

The London Plan asserts the need for an additional 40,000 hotel rooms for twenty years from 2016 to 2036, based on the report *GLA Economics, Understanding the demand for and supply of visitor accommodation in London to 2036*, GLA, 2013¹. For Tower Hamlets, the report allocates 2,900 of the total rooms to Tower Hamlets and 1600 to Hackney: respectively 145 and 80 per year for twenty years.

The new London Plan increases these requirements to 58,000 hotel rooms for 25 years from 2016 to 2041 based on the report *Projections of demand and supply for visitor accommodation in London to 2050 (2017)*². While this sounds like a large number, when broken down per borough and per year the requirements are relatively modest: 5100 of the total is allocated to Tower Hamlets and 3400 to Hackney, 198 and 130 per year respectively.

London was estimated to have 141,000 hotel rooms and Tower Hamlets to have 6,469 rooms in 2015³. Thus the updated London Plan calls for an increase of 41% in room supply across London, but weighted towards Tower Hamlets in which it demands a 79% increase.

The revised Application’s 2019 Hotel Needs Assessment quotes these GLA projections: that the boroughs of Tower Hamlets and Hackney will require additional 5100 bedrooms and 3400 bedrooms respectively over the 2016-2041 period. But since the study was conducted in 2015, approximately 1800 bedrooms (TH) and 850 bedrooms (Hackney) have already been constructed, with an additional 1900 bedrooms (TH) and 750 bedrooms (Hackney) under construction. This would indicate a further need of 1400 rooms and 1800 rooms in TH and Hackney, respectively, to 2041 (from the Hotel Needs Assessment, with numbers rounded to reflect the approximate nature of the research]). This leaves just 70 (TH) and 90 (Hackney) rooms to be apportioned per year for the next twenty years.

A parallel piece of research conducted by ourselves shows that within a 1 mile radius of the application site, around 3000 rooms have been built or are in the pipeline since the report. The combined data suggests that over 50% of all hotel development across Hackney and Tower Hamlets is concentrated at this junction of the two boroughs.

¹ [GLA Economics, Understanding the demand for and supply of visitor accommodation in London to 2036. GLA Working Paper 58, 2013](#)

² [Projections of demand and supply for visitor accommodation in London to 2050. GLA Working Paper 88, 2017](#)

³ *AMPM Database, GLA Economics Analysis* quoted in [1] above

Not included in these figures are three significant planning applications in progress but not yet approved for additional hotel rooms within the Hackney Road to Bethnal Green Road vicinity:

Joe&Joe Hostel (Bethnal Green Road) - 400 hostel beds

114-150 Hackney Road - 253 room hotel

This application - 150 room hotel

This amounts to 803 of Tower Hamlets' entire remaining 1400-room allocation (58%) up to 2041 in the revised London Plan.

A short distance to the west of the current application, Hackney's Great Eastern Street alone boasts at least 1240 hotel rooms in use or being built:

Hoxton hotel - 200 rooms

Nobu - 148 rooms

CitizenM - 216 rooms

Hart Shoreditch - 126 rooms

Art'Otel - 350 rooms

Highgate - 200 rooms

These figures, sourced in various different ways, all tell the same story - that the build-out of hotels is already far in excess of that envisaged by the London Plan or its 2019 update. Given such saturation, the application's Hotel Needs Assessment has not demonstrated additional need for a hotel on this site.

7.1 AIRBNB EXPLOSION

None of the figures in the London plan, or in the reports that feed into it, take account of the extraordinary explosion of short term letting and Airbnb-style room supply in London over the last four years. We can however refer to the recently-published GLA report *Short-term and holiday letting in London*⁴.

- The number of Airbnb listings in London is growing exponentially and has quadrupled in the last four years
- Whilst the report suggests actual figures are hard to measure and are likely to underestimate the full totals, Tower Hamlets offered 4,701 Airbnb lettings on 5 May 2019. This was evenly split between private rooms and whole apartments, so room numbers will be somewhat larger - say 5000-6000. This is a similar size to the baseline figure for total number of hotel rooms offered in Tower Hamlets (6469 - see [2]), so Airbnb is arguably doubling the amount of short stay lettings in the borough.
- Tower Hamlets Airbnb room count in London is second only to Westminster.
- One of the most highly concentrated Airbnb areas in London is Weavers Ward, where the proposed hotel on the Goodsyrd is located.

It is entirely likely that the 77% 1-bedroom private homes will make a substantial increased contribution to the short-term lettings make-up of the area. This does not form part of any current planning policy.

⁴ [Short-term and holiday letting in London. GLA Housing and Land Housing Research Note 2020/04](#)

8 ENVIRONMENT & SUSTAINABILITY

The new London Plan asks for major developments to demonstrate a pathway to zero carbon on site by 2050 but it is not clear how the applicants plan to do this. Given that the applicants cannot demonstrate this, their scheme should be refused as it contravenes NLP policy S12A.

The environmental measures in this development appear to be standard with little sense of urgency about climate issues. It is difficult to judge the whole scheme on its energy statement as a detailed energy statement is only available for plots 2 and 7 - which contravenes NLP policy S12B.

The claim is for a 35% improvement in on-site emissions over building regulations, the current requirement of the London Plan, however the Tower Hamlets Local Plan asks for a 45% reduction in onsite emissions over the requirements of current building regulations, meaning these measures do not meet Tower Hamlets policy. Tower Hamlets needs to reduce carbon dioxide emissions per person significantly more than most other London boroughs, as it is the third worst performing borough within London (Local Plan para 14.48).

The London Plan requires residential developments to 'offset' the carbon emissions produced on site from the required 35% to 100% (zero carbon), which would require paying around £60 per tonne of emissions per year for thirty years. We question why this will only apply to the residential element of the scheme while the larger non-residential commercial side will only offset 35%.

It is not clear who will get the benefit of the offset payment but we fundamentally disagree with the offset strategy, as London and the local area will still suffer the emissions. This is also Tower Hamlets policy: "The policy also recognises that on-site carbon reductions have a greater impact on reducing carbon emissions than contributions in lieu." (Local Plan 14.49)

The proposed scheme is backwards-looking, wasteful of resources and in the case of the office buildings there is mounting evidence that office development is undergoing a change: therefore, as stated above, the development does not conform with the Tower Hamlets Local Plan Key Objective 1a: "Growth must contribute positively to existing identified social, economic and environmental needs".

The transport of materials to and from the site means the Bethnal Green Road will suffer a very high level of lorry traffic that will lead to poor air quality and does not conform with Tower Hamlets policy S.ES1 Protecting and enhancing our environment: "improve air quality; use less energy". This is unsustainable yet inexplicably the Environmental Statement states that construction has no impact on traffic and air quality (Non technical summary 1.11.1). The demolition of the western arches will create a high proportion of these trips through its waste and energy use and should be stopped.

We are also concerned by the air quality red warnings for receptors on Commercial Street and on Sclater Street, Brick Lane and Cheshire Street during construction. The impact of the proposed level of construction traffic has not been explained to the local community. In Sclater Street it is likely that the Brick Lane market and Close-Up Cinema would be irrevocably damaged.

9 DAYLIGHT, SUNLIGHT AND OVERSHADOWING

According to the applicant's 2019 DSO report, the scheme will cast long winter shadows up to Austin Street to the north of the Boundary Estate, and beyond its eastern edge. In the summary report many residential addresses that will be affected were omitted.

We note that there is no final sunlight and daylight report in the latest documents. The Final Response Report states:

The review of this chapter has been undertaken internally by the GLA and comments will follow shortly.

We could not locate these comments in the 2020 consultation documents.

This information is important and should form part of the consultation. Daylight, sunlight and overshadowing issues were a key factor in a recommendation for refusal of the previous version of this application and those concerns should be properly scrutinised at this time.

10 COVID-19 CONSIDERATIONS

The long term impact of COVID-19 is impossible to predict, but it is reasonable to assume that lasting changes in behaviour will result, which will affect patterns of work, leisure and living. There are multiple ways that this impacts the current planning application and render its reasoning and conclusions questionable.

- Demand for large floorplate corporate HQ style offices can be expected to decline.
- Provision of a new retail space is predicated on high concentrations of daily visitors
- The need for living and working to be close together, with less commuting and with local services playing an important role. It would seem more logical that any development here should centre first around the needs of the area instead of tourists and visitors. The local will always be an attractor: the interest in Spitalfields and the East End is due to them being unique local places with a history.
- The site's adjoining neighborhoods should be subject to a wide-ranging Social Infrastructure Needs Assessment (London Plan 3.16) in the light of COVID-19.

As examples of documents that must now be deemed outdated, appendices A and B of the Planning Statement need to be called into question.

11 CONCLUSION

We consider that the public benefits offered by the scheme are not of such exceptional merit that they would come close to outweighing the heritage harm that arises.

We believe the application does not conform to the new London Plan Good Growth policy / objective Making the Best Use of Land GG2E : "understand what is valued about existing

places and use this as a catalyst for growth, renewal, and place-making, strengthening London's distinct and varied character.”

A fundamental issue remains with the height and massing of the proposals particularly at the western end of the site. These tall and massive blocks present an incursion of City-scale buildings and uses east of Shoreditch High Street and Bishopsgate, which is unprecedented and will radically alter the relationship between the City and the East End. It will effectively move the City's cluster of towers northwards and eastwards.

We consider that the proposals would cause a very serious level of harm and urge that planning permission be REFUSED.

(ENDS)