

News International Building, Wapping

in the London Borough of Tower Hamlets

planning application no. PA/09/00548

Strategic planning application stage 1 referral (new powers)

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.

The proposal

Full permission for the remodelling of the existing print works building and the adjoining Rum Warehouse building as a campus type office facility incorporating new retail space and a museum and entailing alterations to the main print works building and the Rum Warehouse, the creation of revised vehicular and pedestrian access routes into and through the site, landscaping to provide publicly accessible space, and car parking, access and servicing provisions.

The applicant

The applicant is **News International Ltd.**, and the architect is **Amanda Levete Architects**.

Strategic issues

The proposed **land use**, urban **design**, approach to **built heritage** and the **access** provisions are largely consistent with London Plan policy. The approach to **biodiversity**, and those aspects of London Plan design policy relating to this, is inconsistent with the London Plan. Further information and commitments are required regarding **climate change** mitigation and adaptation to ensure compliance with the London Plan and aspects of the **transport** proposals are currently inconsistent with the London Plan.

Recommendation

That Tower Hamlets Council be advised that the application does not comply with the London Plan, for the reasons set out in paragraph 61 of this report; but that the possible remedies set out in paragraph 63 of this report could address these deficiencies. The application does not need to be referred back to the Mayor if Tower Hamlets Council resolves to refuse permission, but it must be referred back if Tower Hamlets Council resolves to grant permission.

Context

1 On 28 April 2009 the Mayor of London received documents from Tower Hamlets Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor has until 8 June 2009 to provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for

taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under Category 3F of the Schedule to the Order 2008:

- *"Development for a use, other than residential use, which includes the provision of more than 200 car parking spaces in connection with that use".*

3 Once Tower Hamlets Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision, as to whether to direct refusal; or allow the Council to determine it itself, unless otherwise advised. In this instance if Tower Hamlets Council resolves to refuse permission it need not refer the application back to the Mayor.

4 The Mayor of London's statement on this case will be made available on the GLA website www.london.gov.uk.

Site description

5 The 4.3 hectare News International site is bounded by Pennington Street and Virginia Street to the north, Vaughan Way and a car park to the west, Tobacco Dock to the east and flatted residential development off Asher Way and Wapping Canal to the south.

6 The rectangular site comprises the seven-storey print works building and the single storey Grade II listed Rum Warehouse, which runs along the southern side of Pennington Street. To the west of the site is a car park, which is part of the News International complex but does not form part of the application site. There is currently no public access through the site.

7 Pennington Street lies to the south of The Highway (A1203) which forms part of the Transport for London Road Network. Further to the north, Commercial Road (A13) is also part of the Transport for London Road Network. There are two bus routes serving the area directly (100 and D3) which both serve stops on Wapping Lane, to the east of the site. The site is approximately ten minutes walk from Shadwell Docklands Light Railway and East London Line stations and twelve minutes walk from Tower Gateway (Docklands Light Railway) and Tower Hill (London Underground) stations (although the size of the site can result in increased walking distances, depending on pedestrian access points). The site has a public transport accessibility level of two which is low in comparison with other sites in the City Fringe opportunity area.

Details of the proposal

8 The planning application seeks full permission for the remodelling of the existing print works building and the adjoining Rum Warehouse building as a campus type office facility incorporating: 85,842 square meters of office space (Use class B1); the creation of new retail space (Use classes A1-A3) and museum (Use class D1); external alterations to the main print works building to include a landscaped roof terrace and works of alteration to the Rum Warehouse; creation of revised vehicular and pedestrian access routes into and through the site; landscaping to provide publicly accessible space; and car parking, access and servicing provisions. The planning application is accompanied by an application for listed building consent for the works to the adjoining Rum Warehouse building.

9 The print works building was vacated following the relocation of the printing presses to Broxbourne in April 2008. The proposal would, in broad terms, convert the vacated space for use as office space by News International and remodel the campus as the UK Headquarters for the News International Group accommodating around 4,300 employees.

Case history

10 There is no relevant strategic case history.

Strategic planning issues and relevant policies and guidance

11 The relevant issues and corresponding policies are as follows:

- City Fringe *London Plan*
- World city role *London Plan*
- Economic development *London Plan; the Mayor's Economic Development Strategy*
- Employment *London Plan; PPG4; draft PPS4; Industrial Capacity SPG*
- Urban design *London Plan; PPS1; View Management Framework SPG*
- Built heritage *London Plan; PPG15*
- Inclusive access *London Plan; PPS1; Accessible London: achieving an inclusive environment SPG; Planning and Access for Disabled People: a good practice guide (ODPM)*
- Biodiversity *London Plan; the Mayor's Biodiversity Strategy; Improving Londoner's Access to Nature: Implementation Report; PPS9*
- Sustainable development *London Plan; PPS1, PPS Planning and Climate Change Supplement to PPS1; PPS3; PPG13; PPS22; the Mayor's Energy Strategy; Sustainable Design and Construction SPG.*
- Transport and parking *London Plan; the Mayor's Transport Strategy; PPG13; Land for Transport Functions SPG*

12 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the 1998 Tower Hamlets Unitary Development Plan (saved policies) and the London Plan (Consolidated with Alterations since 2004).

13 The draft City Fringe Opportunity Area Planning Framework (February 2008) is a relevant material consideration.

14 In October 2007 the Secretary of State directed Tower Hamlets Council to withdraw the submitted Tower Hamlets Core Strategy and Development Control development plan documents and the associated area action plans. This includes the City Fringe Area Action Plan (2007) and the supporting Aldgate Masterplan Supplementary Planning Document (2007). The Council has since adopted the withdrawn documents as 'Interim planning guidance for the purposes of development control'. The Council has also recently produced a 'Core Strategy - Options and Alternatives for Places' document which has undergone public consultation. These documents, though of limited weight, are relevant material considerations.

Land use

15 The site lies in the North East sub-region (Policies 5C.1-3) and the City Fringe Opportunity Area (Policy 2A.5) in the London Plan but is outside the Central Activities Zone. Table 5C.1 of the London Plan identifies that the City Fringe opportunity area has an indicative employment capacity of 80,000 jobs and the potential to deliver a minimum of 5,000 homes (both these figures assume commensurate investment in transport capacity enhancements). The draft City Fringe Opportunity Area Planning Framework provides further strategic policy guidance for development in the area and, in particular, supports the intensification of commercial use and enhancement of links through the site, which are both facilitated by the proposal.

16 The London Plan recognises and supports London’s role as a world city and identifies the need to facilitate London’s continued attractiveness to international business activities through the supply of appropriate floorspace. London Plan Policies 3B.1 and 3B.2 seek to support this aspect of London’s world city role and London’s continued economic development by seeking the provision of a variety of type, size and cost of business premises and office space to meet the needs of all sectors.

17 Accordingly, the principle of the proposed remodelling and enhancement of the News International campus and the continuation of employment use on the site is consistent with the relevant policies of the London Plan and guidance in the draft City Fringe Opportunity Area Planning Framework.

Urban design and built heritage

18 Good design is central to all objectives of the London Plan and is specifically promoted by the policies contained within Chapter 4B which address both general design principles and specific design issues. London Plan Policy 4B.1 sets out a series of overarching design principles for development in London. Other design policies in this chapter and elsewhere in the London Plan include specific design requirements relating to maximising the potential of sites, the quality of new housing provision, tall and large-scale buildings, built heritage, designated views, and the Blue Ribbon Network.

19 The proposed layout would result in significant improvements to pedestrian permeability in the area by opening up new routes through the south of the site and between Pennington Street and Wapping Canal via a new public plaza. This, in combination with the active uses and position of the entrances, would animate the locality and improve passive surveillance, particularly around Wapping Canal and Tobacco Dock, which would be opened up to the new plaza.

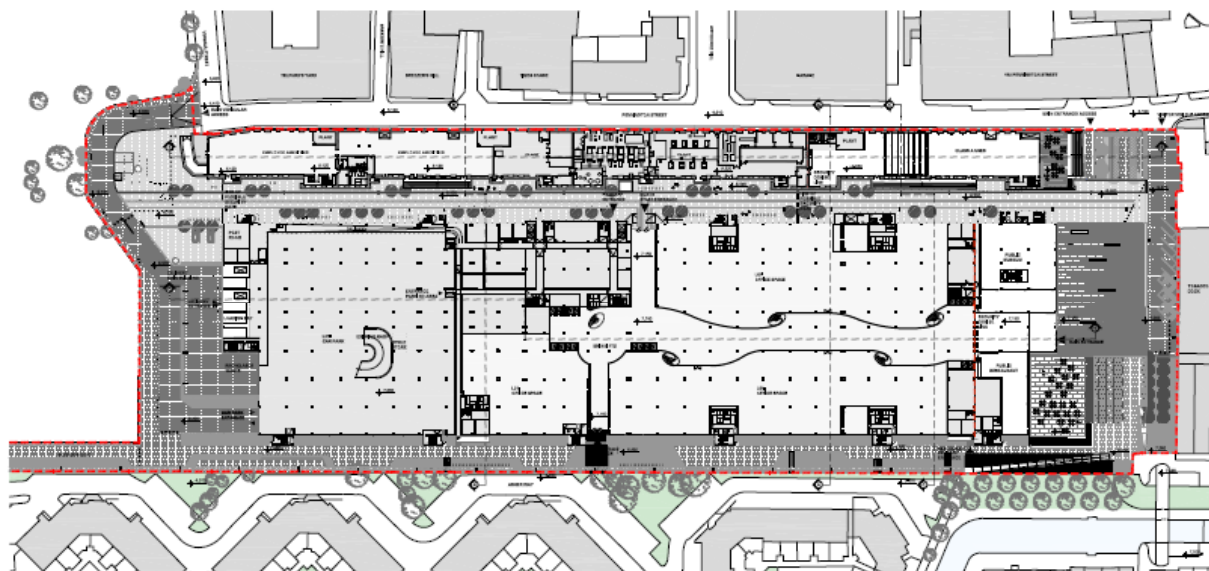


Figure 1: Proposed ground floor layout. Source: Design & Access Statement, April 2009.

20 The proposal would not substantively change the existing form, scale and massing of the main building or the Rum Warehouse with the main changes focused on the eastern end where parts of the existing structures would be demolished to facilitate the creation of the plaza. The acceptability of the proposed removal of the eastern end of the Rum Warehouse should be determined via the accompanying listed building application. The Mayor will have regard to this in forming his final view of this element of the proposal.

21 The most apparent external change to the building would be the alterations to the facade where the architect has proposed an intricate, layered cladding system that expresses the function of the building, particularly the former printing presses. This would combine some brick elements from the existing facade with solid and perforated metal cladding and new glazing to give the building a dynamic and visually engaging appearance that would also break down its massive scale. This would be a significant improvement on the appearance of the existing building. The proposed internal alterations would increase natural light and ventilation in the core of the main building by the insertion of large atria and additional glazing and create a large area of flexible, accessible office space which is a positive aspect of the scheme.

22 The landscape and public realm proposals are, on the whole, well considered but should be developed in response to the biodiversity comments below in order to ensure compliance with policy 4B.1.

23 In summary the proposed design is largely consistent with London design policy but the landscape and public realm proposals should be developed in response to the biodiversity comments below in order to ensure compliance with policy 4B.1.

Inclusive access

24 Policy 4B.5 of the London Plan expects all future development to meet the highest standard of accessibility and inclusion. This, together with the Mayor's Supplementary Planning Guidance 'Accessible London: achieving an inclusive environment', underpins the principles of inclusive design and aims to achieve an accessible and inclusive environment across London.

25 The design and access statement and supporting plans demonstrate that inclusive design principles have informed all aspects of the proposed design. The local planning authority access officer should confirm this through their review of the relevant material, including the detailed plans for the landscaping and public realm, and attach conditions as necessary to any planning consent to ensure compliance with the above policy.

Biodiversity

26 London Plan Policy 3D.14 seeks a proactive approach to the protection, promotion and management of biodiversity in support of the London Biodiversity Strategy. The application site is within an Area of Deficiency in access to nature, as defined in the Improving Londoners' Access to Nature (London Plan Implementation Report). London Plan Policy 3D.14 expects new developments to achieve positive gains for biodiversity conservation through the form and design of development. Measures may include creating and enhancing wildlife habitat and improving access to nature. This especially applies to application sites within or near to areas of deficiency in accessible wildlife sites.

27 The landscape proposals offer the potential to enhance the biodiversity value of the site but at present the design appears to be principally driven by other considerations despite the supportive recommendations contained in the applicant's biodiversity report. This is a missed opportunity and inconsistent with London Plan Policy 3D.14. The applicant should ensure that the landscape proposals reflect the findings of the biodiversity report and would be consistent with London Plan Policy 3D.14. The local planning authority should confirm this through their review of the detailed landscape proposals and attach conditions as necessary to any planning consent to ensure compliance with the above policy.

Climate change - mitigation

28 The London Plan climate change policies as set out in chapter 4A collectively require developments to make the fullest contribution to the mitigation of and adaptation to climate change and to minimise carbon dioxide emissions (Policy 4A.1). The applicant has submitted an energy statement, as required by the London Plan, setting out its approach to applying the energy hierarchy in Policy 4A.1. This is assessed below.

Be lean

29 The applicant is improving the building facade, which is welcomed. The reduction in the demand for energy achieved by this, demand reduction and energy efficiency design measures has been modelled. At present it is not clear that the level of natural ventilation/passive cooling is the most that could be achieved and the applicant should provide further details, supported by modelling, demonstrating that this has been maximised as far as reasonably possible. The applicant should also clarify whether the lighting system could be improved further as part of the refurbishment works and model any energy savings attributable to this.

Be clean

30 The applicant has described that there are currently six gas boilers in the boiler plant room with a total capacity of 15 MW thermal. The operational life remaining for this plant is in the range of 15 years and a survey concludes that most of the existing plant can be retained. There are four chillers, installed in 1997, on site in order to cope with the cooling requirements. A total of 8MW cooling capacity is installed, which is very close to the estimated cooling peak demand after the proposed works take place.

31 The efficiency and operational life remaining in the current system is acknowledged, as are the expected improvements in chiller efficiency. Consequently the installation of a combined heat and power or combined cooling heat and power system at this time may not achieve significantly greater carbon savings unless this served a wider area. The applicant has not identified any available heat loads adjacent to the development that could be served by the development.

32 That being the case, in order for the retention of the existing equipment to be acceptable the applicant should demonstrate that the design of the energy systems would allow for future connection to a district energy system in the area and neighbouring sites (including the adjacent car park site which is likely to be redeveloped in the near future).

Be green

33 The proposed use of solar thermal panels to provide around 100 MWh of domestic hot water per year is welcomed. Further to this, the applicant has stated that use of photovoltaic panels is technically viable and has estimated that of the 1,256 sq.m. of roof available, half could be used for photovoltaic panels (only 144 sq.m. has been used for solar thermal panels at present). The applicant has, however, disregarded the use of photovoltaic panels on the basis of cost which is unacceptable. The proposal should be revised to include greater photovoltaic panel coverage towards the target of 20% renewable energy generation on site.

Summary

34 The proposed energy efficiency measures are welcomed but the applicant should address the questions raised above to confirm compliance with the London Plan. The applicant should also demonstrate that the proposed system would be capable of future connection to a district energy system in the area in line with the London Plan. The proposal should be revised to include greater

photovoltaic panel coverage towards the target of 20% renewable energy generation on site. Until these matters have been addressed the application is inconsistent with London Plan policies 4A.1, 4A.6, and 4A.7.

Climate change - adaptation

35 The London Plan includes five principles in Policy 4A.9 to promote and support the most effective adaptation to climate change. These are to minimise overheating and contribution to heat island effects, minimise solar gain in summer, contributing to flood risk reductions, including applying sustainable drainage principles, minimising water use and protecting and enhancing green infrastructure. Specific policies cover overheating, living roofs and walls and water. London Plan Policy 4A.3 promotes sustainable design and construction and this is supported by the Sustainable Design and Construction SPG. The applicant has not submitted a sustainability statement as required by London Plan Policy 4A.3 but has submitted sufficient other information to address this matter.

36 London Plan Policy 4A.10 addresses overheating in buildings and the heat island effect in London. The extensive improvements to the ventilation and cooling of the building, the living roof and landscaping proposals are all positive in this regard but the applicant should note and address the comments elsewhere in this report regarding these matters.

37 London Plan Policy 4A.11 promotes the inclusion of living roofs and walls. The proposal would incorporate a significant area of living roofs except where plant and maintenance space prohibit this. The proposal is therefore consistent with London Plan policy. If the local planning authority is minded to approve the application it should enforce the implementation, operation and retention of the relevant measures by planning condition.

38 The majority of the proposal lies within an area classified by the Environment Agency as Flood Zone 1 (low risk of flooding) although parts lie in Flood Zones 2 and 3a. London Plan Policy 4A.14 seeks to ensure that surface water run-off associated with a proposed development is managed as close to its source as possible, and sets out a hierarchy of preferred measures to achieve this. The proposal would incorporate living roofs, which would reduce surface water run-off, and rainwater harvesting and would offer significant improvements on the existing situation. If the local planning authority is minded to approve the application it should enforce the implementation, operation and retention of the relevant measures by planning condition.

39 Policy 4A.16 of the London Plan requires the Mayor and boroughs to have regard to the impact of proposals on water demand and existing capacity by minimising the use of treated water and maximising rainwater-harvesting opportunities. The water report submitted suggests a range of water efficiency measures that would or could be adopted in the scheme and the potential savings that would result. This is welcomed but the applicant should clarify all water efficiency measures that would be incorporated into the building and if the local planning authority is minded to approve the application it should enforce the implementation, operation and retention of the relevant measures by planning condition.

Transport

40 This application was the subject of Transport for London (TfL) pre-application advice issued on 16 March 2009 which stated that before TfL can support the scheme, concerns related to pedestrian and cycle access and the need to accommodate increased public transport trips and reduce travel demand should be addressed, whilst additional information was required on the quality of pedestrian and cycle facilities, bus stop infrastructure, the Travel Plan and the future use of the surface car park.

Trip generation and modal split

41 Although lower than during the site's operation as a print works, there will still be a significant number of car trips following the remodelling given the 270 parking spaces to be retained on site. By reducing the number of spaces to bring provision in line with the London Plan, the number of car trips could be reduced.

42 The data presented in the applicant's Transport Assessment report indicates that there will be a significant increase in non-car trips following the remodelling. Whilst the list of sites used from the TRAVL database to assess modal split is reasonable, TfL has concerns about the low mode split estimate for buses as this has been reduced from 12% to 7% with trips re-allocated to cycling and walking. TfL does not accept the various arguments put forward by the applicant's consultants to justify this. In TfL's view the reduction is unrealistic and even the 12% may represent an underestimate when making allowance for connecting trips by bus to rail stations. TfL therefore requests the modal split is revised to address the above concerns.

Car parking

43 The existing News International site provides 596 car parking spaces in a combination of covered and surface parking areas. The surface parking area to the west of the site does not form part of the current application. At the pre-application meeting, concerns were expressed about the way in which trips associated with the surface car park should be treated in the transport assessment. The key issue is that the car park could be brought back into use and this would generate additional traffic without a requirement to apply for planning permission. TfL understands that the applicant is prepared to enter into an undertaking to restrict future use of the car park. This has now been confirmed by the applicant in correspondence and should therefore be secured through a legally binding agreement.

44 Although TfL welcomes any reduction in car parking, the retention of 271 spaces would still exceed London Plan and the Council's standards for office uses. Annex 4 of the London Plan specifies a maximum provision for offices in inner London but outside the Central Activities Zone of 1 space per 600 square metres. Based on a total office floor space of 85,824 square metres, this would permit a maximum of 143 spaces. The Council's standard of 1 space per 1,250 square metres, which are supported by TfL, would only permit a maximum of 69 spaces. Whether measured against the London Plan or Council standards, the provision of 271 spaces is excessive and should be reduced in combination with measures to improve access for non-car users.

45 TfL welcomes the commitment to provide electric vehicle charging points. Provision should be made to allow the number of points to be increased should this be warranted by future demand.

Impacts on the bus network

46 At the pre application meeting, TfL requested a person-based trip generation analysis for bus services, by time and direction, with peak hour trip generation calculated separately, supplemented by survey data indicating expected origins and destinations. This has not been carried out, but in its absence and based on a very conservative 12% mode share, TfL estimates that the proposed remodelling will generate a minimum of 48 additional bus trips during the peak hour. It cannot be assumed that passengers will arrive at the stops at regular intervals and be distributed evenly between services. Given that Route 100 is already at capacity this would require an additional bus to be provided to accommodate the trips at a cost of £220,000 per annum for a period of three years, resulting in a total contribution of £660,000. The contribution to provide additional bus capacity should form part of the section 106 agreement. In recent correspondence the applicant's consultant has rejected this request, although this appears to be based on a misunderstanding that it relates to a new bus service. The requirement is for a contribution to

provide additional bus capacity on routes serving the development to cater for the additional bus trips arising directly as a result of the remodelling.

47 The transport assessment also indicates that there will be increased demand for connecting trips by bus to Tower Hill. Although some of these trips may use the shuttle bus, the option will not be available for occasional visitors. Any delays to the shuttle bus or trips undertaken outside the limited hours of operation will lead to increased demand on conventional services. This further strengthens the requirement for additional bus capacity. The applicant has provided information on the times of shuttle bus operation but there is no guarantee that this service would be maintained. TfL believes that a more effective way to cater for increased travel demand would be through capacity enhancements to the conventional bus network which would cater for a wider range of trips to the site. The future role and operation of the shuttle bus should be considered as part of the travel plan framework.

48 Although a bus stop audit has been carried out, TfL would expect the applicant to fund measures that addressed the identified deficiencies as well as meeting standards for full accessibility at stops serving the site. Improvements should be secured through the section 106 agreement. An allowance of up to £15,000 per stop should be made unless the specific scope of works has been more accurately costed.

Impacts on rail stations and interchange

49 Based on the transport assessment, additional use of Tower Hill station would represent 5% of total egress from the station during the morning peak. This significant increase in usage would cause concern, given existing capacity constraints within the station and high pedestrian flows in the surrounding area. TfL Interchange is currently examining options to improve interchange and accessibility in the Tower Hill and Tower Gateway areas. Based on the figures presented in the transport assessment, a significant contribution towards the work undertaken by TfL Interchange to mitigate the impact of these additional trips would be expected.

50 However, TfL questions the assumption that such a large proportion of national rail based trips will use Tower Hill. For a significant number of journeys, the DLR from Bank to Shadwell is likely to provide a more attractive option, particularly given changes to pedestrian access arrangements at the News London site which will shift the focus from the west to the east. TfL would expect a sensitivity analysis to be carried out which assumed a higher proportion of trips using Shadwell. Although there have been recent improvements at Shadwell DLR station that have helped to address security concerns, further proposals have now been developed to improve interchange and upgrade the public realm. Depending on the results of the sensitivity tests, a contribution to works at Shadwell may be justified. TfL understands that the applicant has now agreed to provide £50,000 towards improvements to Dellow Street linking the site to Shadwell – this is welcomed.

Pedestrian environment

51 At the pre-application meeting, TfL requested a walking audit utilising the Pedestrian Environmental Review System (PERS) focusing on desire lines to principal public transport facilities as well as the immediate surroundings of the site. Apart from a cursory analysis of conditions on Pennington Street and The Highway, this has not been provided in the original submission. It is disappointing that, given the acknowledged security concerns of existing staff, TfL's request for a pedestrian audit have been rejected by the applicant in its recent response, particularly given the increased numbers of pedestrians that will result directly from the remodelling. This issue is, therefore, still outstanding and should be addressed.

Provision for cyclists

52 A cycle audit was previously requested and although limited information has been provided on cycle routes, there has been no examination of facilities such as toucan crossings and advanced stop lines.

53 Although the transport assessment did not originally include details of cycle parking, the applicant's consultant has now confirmed that 548 cycle spaces will be provided in total together with shower/changing facilities. These provisions are in accordance with TfL guidelines and are welcomed. Locations should be convenient for entrances to the building, secure and sheltered. Cycle parking for visitors should be provided in a prominent position.

54 TfL had previously understood that the applicant would be willing to provide an area of land for a cycle hire docking station. However, there were no references to this in either the transport assessment or the travel plan. Although the site lies outside zone 1 and would not form part of the initial scheme to be launched in 2010, it is just beyond the boundary and likely to feature early in a future roll-out programme. The site would need to be accessible to the public at all times. A commitment to the provision of land for a cycle hire docking station should be secured through the section 106 agreement. It is understood that this could be incorporated as part of the planned public realm works on Pennington Street. If this option is pursued it is important that the design of these works takes place in consultation with the Cycle Hire team at TfL.

Travel Plan requirements

55 The travel plan framework submitted as part of the transport assessment falls well short of the requirements set out in TfL guidance. A full travel plan should be submitted with the planning application because the land use classes and end occupiers are known. There is real potential for News International to develop an exemplar Travel Plan that will support the proposed remodelling. In correspondence the applicant's consultant has confirmed that a more detailed travel plan will shortly be submitted and TfL looks forward to reviewing this document.

56 TfL welcomes information on servicing and the inclusion of a draft delivery and servicing plan. This should form the basis for securing a delivery and servicing plan through the section 106 agreement or by condition. The applicant has confirmed that a construction logistics plan would be submitted to demonstrate how the impacts of construction activity on the transport network will be managed.

Summary

57 To fully comply with London Plan policies 3C.1, 3C.3, 3C.20 and 3C.21 the development should provide funding towards additional bus capacity and include measures to improve access to and from the site for pedestrians and public transport users. To comply with London Plan policies 3C.23 and 3C.17 the amount of car parking should be reduced in line with maximum standards in Annex 4 and a legal agreement should be drawn up to restrict future use of the surface car park. TfL welcomes proposals to improve Pennington Street and Dellow Street and to open up the public realm around the site which will help to achieve the aims of Policy 3C.18 and support Policy 3C.21. The proposals for cycle parking and a cycle hire facility are also welcomed and will support policy 3C.22. Submission of a more detailed Travel Plan as requested will help to achieve the objectives of Policy 3C.2.

Local planning authority's position

58 This remains to be determined at this time.

Legal considerations

59 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged or direct the Council under Article 6 of the Order to refuse the application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

Financial considerations

60 There are no financial considerations at this stage.

Conclusion

61 London Plan policies on land use, design, inclusive access, biodiversity, climate change and transport are relevant to this application. The application complies with some of these policies but not with others, for the following reasons:

- **Land use:** the proposal is consistent with London Plan policies 2A.5, 3B.1, 3B.2, 5C.1 and 5C.3.
- **Urban design and built heritage:** the proposal is inconsistent with the requirements of London Plan Policy 4B.1 (as relate to biodiversity) but consistent with 4B.11 and 4B.13.
- **Inclusive access:** the proposal is consistent with London Plan Policy 4B.6.
- **Biodiversity:** the proposal is inconsistent with London Plan Policy 3D.14.
- **Climate change mitigation:** the application is inconsistent with London Plan policies 4A.1, 4A.6, and 4A.7.
- **Climate change adaptation:** the application is consistent with London Plan policies, 4A.10, 4A.11, 4A.14, and 4A.16.
- **Transport:** the proposal is inconsistent with London Plan policies 3C.1, 3C.2, 3C.3, 3C.17, 3C.20, 3C.21, and 3C.23.

62 On balance, the application does not comply with the London Plan.

63 The following changes might, however, remedy the above-mentioned deficiencies, and could possibly lead to the application becoming compliant with the London Plan:

- **Urban design and biodiversity:** the applicant should ensure that the landscape proposals reflect the findings of the biodiversity report and revise them as necessary in order to be consistent with London Plan policies 3D.14 and 4B.1.
- **Climate change mitigation:** the applicant should provide the further information requested regarding energy efficiency and district energy systems and revise the proposal to include greater photovoltaic panel coverage towards the target of 20% renewable energy generation, in line with London Plan policies 4A.1, 4A.6, and 4A.7.
- **Transport:** the applicant should address all of the detailed comments and requirements set out above in order for the proposal to be considered consistent with London Plan policies 3C.1, 3C.2, 3C.3, 3C.17, 3C.20, 3C.21, and 3C.23.

for further information, contact Planning Decisions Unit:

Giles Dolphin, Head of Planning Decisions

020 7983 4271 email giles.dolphin@london.gov.uk

Justin Carr, Strategic Planning Manager (Development Decisions)

020 7983 4895 email justin.carr@london.gov.uk

Colin Wilson, Strategic Planning Manager (Planning Frameworks)

020 7983 4783 email colin.wilson@london.gov.uk

David Watkinson, Senior Strategic Planner / Urban Designer (Case Officer)

020 7983 4493 email david.watkinson@london.gov.uk
