

GREATER LONDON AUTHORITY

[REDACTED]
(By email)

Our Ref: MGLA090620-4119

29 June 2020

Dear [REDACTED]

Thank you for your request for information which the Greater London Authority (GLA) received on 8 June 2020. Your request has been dealt with under the Freedom of Information Act 2000

You asked for:

- 1) A copy of all email/postal correspondence between the office of the Mayor of London/GLA and Tower Hamlets Council regarding the planning applications for City Pride & Island Point, Isle of Dogs between 1 January 2013 and 1 November 2013, and;*
- 2) A copy of all email/postal correspondence between the office of the Mayor of London/GLA and Chalegrove Properties Ltd regarding the planning applications for City Pride & Island Point, Isle of Dogs between 1 January 2013 and 1 November 2013.*

Our response to your request is as follows:

Please find attached the information the GLA holds within scope of your request. Please note that some names of members of staff are exempt from disclosure under s.40 (Personal information) of the Freedom of Information Act. This information could potentially identify specific employees and as such constitutes as personal data which is defined by Article 4(1) of the General Data Protection Regulation (GDPR) to mean any information relating to an identified or identifiable living individual. It is considered that disclosure of this information would contravene the first data protection principle under Article 5(1) of GDPR which states that Personal data must be processed lawfully, fairly and in a transparent manner in relation to the data subject

If you have any further questions relating to this matter, please contact me, quoting the reference at the top of this letter.

Yours sincerely

[REDACTED]
Information Governance Officer

If you are unhappy with the way the GLA has handled your request, you may complain using the GLA's FOI complaints and internal review procedure, available at:

<https://www.london.gov.uk/about-us/governance-and-spending/sharing-our-information/freedom-information>

GREATER LONDON AUTHORITY
Development and Environment Directorate

City Hall
The Queen's Walk
More London
London SE1 2AA
Switchboard: 020 7983 4000
Minicom: 020 7983 4458
www.london.gov.uk

██████████
Tower Hamlets Council
Town Hall
Mulberry Place
5 Clove Crescent
E14 2BG

Our ref: PDU 2187b
Your ref: PA/12/03248
Date: 4 February 2013

Dear ██████████

Town & Country Planning Act 1990 (as amended); Greater London Authority Act 1999 & 2007; Town & Country Planning (Mayor of London) Order 2008.
City Pride Public House, 15 Westferry Road, London, E14 8JH
PA/12/03248

Thank you for consulting the Mayor of London in respect of the above application of potential strategic importance, which your Council validated on 22 January 2013.

Under Article 4(2) of the above Order the Mayor has six weeks from the date of receipt to provide a statement setting out whether he considers the application complies with his London Plan and his reasons for taking that view.

I hereby give notice that your letter was received on 25 January 2013 and therefore the six-week period will terminate on 7 March 2013.

The application has been allocated to ██████████ who can be reached on 020 7983 ██████████ or ██████████ [@london.gov.uk](mailto:██████████@london.gov.uk).

A copy of this letter has been forwarded to the agent for information.

Yours sincerely,

Planning Decisions

Greater London Authority

cc **GVA Grimley, 10 Stratton Street, London, W1J 8JR**

Development & Environment Directorate

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Web: www.london.gov.uk
Our ref: 2187b&2188bEW01
Your ref: PA/12/03248 &
PA/12/03247
Date: 21 March 2013

Dear ██████████,

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

City Pride Public House, 15 Westferry Road, London, E14 8JH

PA/12/03248

Island Point, Site at 443 to 451, Westferry Road, London

Local Planning Authority Reference: PA/12/03247

I refer to the copy of the above planning applications, which were received from you on 25 January 2013 together with amended documents which were received on 22 February 2013. On 21 March 2013 Sir Edward Lister, Deputy Mayor and Chief of Staff, acting under delegated authority, considered a report on these proposals, reference PDU/2187b&2188b/01. A copy of the report is attached, in full. This letter comprises the statement that the Mayor is required to provide under Article 4(2) of the Order.

The Deputy Mayor considers that the application is generally acceptable in strategic planning terms however further discussion is needed, together with some consequent changes, on the issues set out in paragraph 118.

At the meeting the Deputy Mayor expressed his concern regarding the lack of affordable rented housing.

The application represents EIA development for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011. The environmental information made available to date has been taken into consideration in formulating these comments.

If your Council subsequently resolves to make a draft decision on the applications, it must consult the Mayor again under Article 5 of the Order and allow him fourteen days to decide whether to allow the draft decisions to proceed unchanged, or direct the Council under Article 6 to refuse the applications, or issue a direction under Article 7 that he is to act as the local planning authority for the purpose of determining the applications and any connected applications. You should therefore send me a copy of any representations made in respect of the applications, and a copy of any officer's reports, together with a statement of the decision your authority proposes to make, and (if it proposed to grant permission) a statement of any conditions the authority proposes to impose and a draft of any planning obligation it proposes to enter into and details of any proposed planning contribution.

Please note that the Transport for London case officer for this application is [REDACTED]
telephone 020 3054 [REDACTED]

Yours sincerely,

[REDACTED]

Senior Manager– Planning Decisions

cc John Biggs, London Assembly Constituency Member
Nicky Gavron, Chair of London Assembly Planning Committee
National Planning Casework Unit, DCLG
Alex Williams, TfL
Daniel Massie, GVA, 10 Stratton Street, London, W1J 8JR

City Pride & Island Point, Isle of Dogs**in the London Borough of Tower Hamlets****planning application no. PA/12/03248 & PA/12/03247****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

City Pride- Erection of residential led mixed use 75 storey tower (239m AOD) comprising 822 residential units and 162 serviced apartments and associated amenity floors, roof terrace, basement car parking, cycle storage, plant and an amenity pavilion including retail.

Island Point- erection of buildings ranging in height from 3-5 storeys with rooftop pavilions rising to 6 storeys, providing 173 residential units with underground parking, open space, plant and associated community building.

The applicant

Is **Charlegrove Property Ltd** and the architect is **Squires and Partners**.

Strategic issues

The development of these residential schemes is welcomed and is broadly in line with London Plan policy. The land use principle is accepted and the height of the buildings have an acceptable impact on strategic views. Further discussion is needed on residential quality, affordable housing, inclusive design, sustainable development and transport.

Recommendation

That Tower Hamlets Council be advised that the application is generally acceptable in strategic planning terms however further discussion is needed on the issues set out in paragraph 116.

Context

1 On 25 January 2013 the Mayor of London received documents from Tower Hamlets Council notifying him of planning applications of potential strategic importance to develop the above site for the above uses, and on 22 February 2013 amended documents were received. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor has until 4 April 2013 to provide the Council with a statement setting out whether he considers that the applications comply 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 City Pride application is referable under Category 1A, 1B and 1C of the Schedule to the Order 2008:

- Category 1A of the Schedule to the Order 2008: *“Development which comprises or includes the provision of more than 150 houses, flats or houses and flats.”*
- Category 1B *“Development (other than development which only comprises the provision of houses, flats or houses and flats) which comprises or includes the erection of a building or buildings in Central London (other than the City of London) with a total floorspace of more than 20,000 sq.m”*
- Category 1C *“Development which comprises or includes the erection of a building of one or more of the following descriptions, the building is more than 30 metres high and is outside of the City of London”*

3 The Island Point application is referable under Category 1A of the Schedule to the Order 2008.

4 Once Tower Hamlets Council has resolved to determine the applications, it is required to refer them back to the Mayor for his decision as to whether to direct refusal; take them over for his own determination; or allow the Council to determine them itself.

5 The environmental information for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 has been taken into account in the consideration of this case.

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

Site description

7 The proposal comprises two sites. The first, the City Pride site at 15 Westferry Road is located to the west of West India Dock South. The site is bounded by the A1206 Westferry Road to the west, Marsh Wall to the east, a pump house to the north and the Landmark Development, a new high-rise residential development, to the south. The A1261 Aspen Way, which forms part of the Transport for London Road Network, is approximately 680 metres to the north.

8 The site is well served by public transport with Heron Quays DLR station 250 metres to the east and Canary Wharf DLR station 400 metres to the north-east. Canary Wharf underground station (Jubilee Line) is 520 metres to the east and South Quay DLR is 420 metres south-east of the site. Five bus routes: 277, D3, D7, D8, 135 and N50 are accessible from the site. Correspondingly, the public transport accessibility level of the site is 5 (on a scale where 6 is high and 1 is low).

9 The second, the Island Point site at 443-451 Westferry Road, is located towards the southern tip of the Isle of Dogs on the northern side of Westferry Road, west of Millwall Park. The site fronts directly onto the A1206 Westferry Road and is bounded by residential developments off Chapel House Street to the north and west. Residential apartments around Lockesfield Place lie immediately to the east of the site. The area is characterised by 2-storey dwelling houses and taller flatted developments.

10 The site is served by two DLR stations; Mudchute station, 450 metres north-east of the site and Island Gardens station, 500 metres to the east. The site is well served by buses with three bus

routes running along Westferry Road and two other routes serving stops on Spindrift Avenue and East Ferry Road. Other public transport infrastructure includes Canary Wharf Underground station 1.7 kilometres to the north, Greenwich National Rail station 1000 metres to the south, via the Greenwich Foot Tunnel, and Masthouse Terrace Pier (Thames Clipper), 500 metres west of the site. Correspondingly, the public transport accessibility level of the site is 3 (on a scale where 6 is high and 1 is low).

Details of the proposal

11 The proposal is for the development of both sites. The Island Point site will provide the majority of the affordable housing for the City Pride development. The development description is as follows:

City Pride

12 Erection of residential led mixed use 75 storey tower (239m AOD) comprising 822 residential units and 162 serviced apartments and associated amenity floors, roof terrace, basement car parking, cycle storage, plant and an amenity pavilion including retail. For comparison the height of 1 Canada Square is 235m AOD. The residential mix is as set out in the table below:

Unit size	Private	Intermediate	Total	%
Studio	176	2	178	21.5
1 bed	324	36	360	44
2 bed	212	32	244	30
3 bed	36	0	36	4
4 bed	4	0	4	0.5
Total	752	70	822	
%	91%	9%		

13 Island Point- erection of buildings ranging in height from 3-5 storeys with rooftop pavilions rising to 6 storeys, providing 173 residential units with underground parking, open space, plant and associated community building. The residential mix is as set out in the table below:

Unit size	Private	Intermediate	Social rented	Total	%
1 bed		9	11	20	12
2 bed		18	22	40	23
3 bed		4	73	77	44
4 bed		0	26	26	15
5 bed		0	10	10	6
Total		31	142	173	
%	0%	18%	82%		

Case history

14 In July 2008 the applicant sought permission for the erection of a 62-storey tower (214m AOD) and 14-storey podium at City Pride, comprising 430 residential units, a 209-bed hotel, 18 serviced apartments together with ancillary restaurants, conference facilities, health club and associated car and cycle parking. Permission was also sought for the erection of six buildings ranging in height from 2 to 8 storeys to provide 189 residential units with associated car and cycle parking. These applications were withdrawn by the applicant, after the Stage I consultation response had been issued, to allow for the alteration to the podium at City Pride (a reduction in height from 14 to 9 storeys and a revised footprint) (PDU ref. 2187 and 2188.)

15 In 2009 planning permission was granted for the following: City Pride – The erection of a part 9, part 62-storey tower comprising 430 residential units, 203-bed hotel with conference facilities, spa, swimming pool, gymnasium, reception and lounge bar. Island Point – The erection of six buildings ranging in height from 2 to 8 storeys comprising 189 residential units. (PDU ref. 2187a and 2188a). These applications were supported by the GLA. These applications have been technically implemented, but not built out.

16 A pre-application meeting was held on the current proposals in August 2012. The advice report set out that the principle of the proposal was supported but that further discussion was needed on design and affordable housing in particular.

Strategic planning issues and relevant policies and guidance

17 The relevant issues and corresponding policies are as follows:

- Housing *London Plan; Housing SPG; Housing Strategy; draft Revised Housing Strategy; Providing for Children and Young People's Play and Informal Recreation SPG;*
- Affordable housing *London Plan; Housing SPG; Housing Strategy; draft Revised Housing Strategy*
- Density *London Plan; Housing SPG;*
- Urban design *London Plan;*
- Mix of uses *London Plan*
- Regeneration *London Plan; the Mayor's Economic Development Strategy*

• Transport	<i>London Plan; the Mayor's Transport Strategy;</i>
• Crossrail	<i>London Plan; Mayoral Community Infrastructure Levy; Crossrail SPG</i>
• Parking	<i>London Plan; the Mayor's Transport Strategy</i>
• Access	<i>London Plan; Accessible London: achieving an inclusive environment SPG; Planning and Access for Disabled People: a good practice guide (ODPM)</i>
• Tall buildings/views	<i>London Plan, Revised View Management Framework SPG</i>
• Historic Environment	<i>London Plan; World Heritage Sites SPG; Circular 07/09</i>
• Ambient noise	<i>London Plan; the Mayor's Ambient Noise Strategy;</i>
• Air quality	<i>London Plan; the Mayor's Air Quality Strategy;</i>
• Health	<i>London Plan; Health Inequalities Strategy</i>
• Education	<i>London Plan</i>
• Sustainable development	<i>London Plan; Sustainable Design and Construction SPG; Mayor's Climate Change Adaptation Strategy; Mayor's Climate Change Mitigation and Energy Strategy; Mayor's Water Strategy</i>

18 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 Tower Hamlets Core Strategy 2010, the saved policies of the Tower Hamlets Unitary Development Plan 1998 and the 2011 London Plan.

19 The following are also relevant material considerations:

- The National Planning Policy Framework and Technical Guide to the National Planning Policy Framework;
- The Managing Development Development Plan Document (submission version) which has been through EiP and for which the Inspector's report has been received;
- The draft Revised Early Minor Alteration to the London Plan.

Principle of use

20 The City Pride site is located in the Isle of Dogs opportunity area, which is identified in the London Plan as being capable of accommodating at least 10,000 additional dwellings. Mixed-use developments and densities which support the Isle of Dogs interdependence with central London and the Central Activities Zone are also supported. The principle of a mixed-use redevelopment of the site is therefore acceptable in strategic planning terms in accordance with policy 2.13 of the London Plan.

21 The provision of residential accommodation on the Island Point site is supported by policies 3.3 and 3.4, which seeks to increase London's supply of housing. Policy 3.4 seeks to ensure that development proposals achieve the maximum intensity of use compatible with the local context and character, the design principles in chapter 7 of the London Plan and with public transport capacity. The principle of residential accommodation on this site is therefore acceptable.

22 The replacement of the hotel with serviced accommodation is not of strategic concern but this use must be conditioned to prevent it becoming permanent accommodation.

23 The principle of an off site donor site for affordable housing which was established under the extant planning permission is allowed for in the 2011 London Plan. This states in exceptional circumstances off site provision may be provided to secure efficient delivery of new affordable housing on sites identified elsewhere where it is possible to secure a higher level of provision, better address priority needs, especially for affordable family housing, secure a more balanced community and better sustain strategically important clusters of economic activity especially in parts of the CAZ and north of the Isle of Dogs. Notwithstanding that, the fact that the donor site now provides 100% affordable housing is a concern given that the London Plan promotes the development of mixed and balanced communities.

24 London Plan policy 3.7 sets out that large residential developments should be properly masterplanned to co-ordinate the provision of social, environmental and other infrastructure. Although it is accepted, given the small size of the site, that social infrastructure cannot be provided on-site further discussion is needed over section 106 contributions and provision in the wider area.

Housing

25 On the City Pride site only 4.5% family units are provided, and none of the intermediate units are family units, given the location, the typology of the development and the constraints of the site this is acceptable in this instance.

26 The Island Point Site is 100% affordable split 82%:18% social rented:intermediate. 65% of the units are family units. The London Plan promotes the development of mixed and balanced communities and whilst the level of family units is supported the fact that the development is 100% affordable is of some concern. The principle of the Island Point site being a donor site for the City Pride development was established by the extant permission however the current proposal should be amended to include an element of market housing. Further discussion is also needed regarding the rented housing proposed. These should be affordable rented units in line with Government policy.

27 The applicant has submitted a viability assessment with the application and this is being independently assessed by the Council. Further discussion will be needed on whether the maximum reasonable amount of affordable housing has been provided following the receipt of the independent assessment.

Child playspace

28 Using the Child Playspace SPG methodology the City Pride site generates a child yield of 60. As such 600 sq.m. of child playspace should be provided. 730 sq.m. of playspace is provided on-site for all age groups and this is welcomed.

29 Using the Child Playspace SPG methodology the Island Point site generates a child yield of 252. As such 2,520 sq.m. of child playspace should be provided. 2,298 sq.m. of playspace is provided on-site for 0-11's. No on-site playspace for over 12's is provided on-site and the applicant sets out that there are two playspaces for older children within 800m of the application site. The applicant should set out what the capacity of these spaces are and whether there is a need for upgrade to these spaces.

Density

30 Given the height of the development and the fact that the site is very small the density of the City Pride site will be well above the density range set out in the London Plan. The

applicant has not set out the density but officers estimate that it is in the region of 7,300 habitable rooms per hectare. Given the nature of the site, the character of the surrounding area and the overall design quality of the scheme this may be acceptable in this instance subject to satisfactory further information regarding residential quality being supplied as set out below.

31 The density of the Island Point site is 584 habitable rooms per hectare and this is in line with the London Plan density guidelines.

Urban design

City Pride

32 Pre-application comments for the design of the City Pride development raised a number of issues with the design of the scheme, in particular with the ground floor layout and the residential quality, whilst some of these issues have been addressed others have not which is disappointing.

33 Concerns were previously raised regarding the quality of the ground floor frontage facing Westferry Road, which included a significant stretch of inactive frontage which undermined the quality of the public realm along this stretch of the street. This has since been addressed by increasing the amount of retail frontage and consolidating the service access which is welcomed.

34 Similar issues were raised regarding the ground floor frontage of the south of the tower, which is inhabited by the sub-station and refuse store. This has not been addressed which is disappointing. The applicant is advised to provide illustrations of the route adjacent to this to illustrate how the negative impact of this is being mitigated.

35 At pre-application stage concerns were raised over the residential quality of the scheme, in particular regarding the high proportion of single aspect units and large number of units sharing communal space on each floor. Fire doors have since been included splitting the communal areas in two separate clusters of six and eight units which mitigates some of the issues of having many households sharing the same communal space, however for this to be effective the fire doors need to be alarmed so they are not used. The high proportion of single aspect units is a result of the large footprint of the tower. The applicant is asked to set out how the issues associated with single aspect units have been mitigated, in particular need for deep penetration of light into the units.

36 The proposed building will be one of the tallest buildings in the emerging cluster when seen from the south. However, its impact on protected views and world heritage sites has been explored and officers are satisfied the scheme will not have a detrimental impact on either when seen in the context of the emerging proposals for the area. Its simple massing and footprint creates an elegant building which is welcomed, however, particular care will need to be taken on ensuring the detailing of the building will be of the highest quality.

37 In conclusion, while the overall design of the scheme is acceptable, there is concern with the quality of the route along the southern edge of the building and the residential quality. The applicant is advised to address these issues.

Island Point

38 At pre-application stage it was set out that the proposal for Island Point was generally supported as the street based approach created a good quality public realm whilst providing high quality usable private open space. The frontage on to Westferry Road is particularly welcomed, as it will contribute to improving the quality of the streetscape by providing a good level of enclosure

and generating pedestrian activity that would rebalance the currently vehicular dominated environment.

39 Concerns were raised at pre-application stage regarding the lack of individual entrances to all ground floor apartments directly from the public realm, as suggested in the London Housing Design Guide. These have since been provided creating an active and safe streetscape which is strongly supported.

40 The provision of front entrances to ground floor units means that the residential elements of the scheme are of a high quality, with a good amount of private open space, a high percentage of dual aspect units and a generally well considered layout.

41 The height of the scheme is generally in keeping with the surrounding area and the massing is simple and elegant. The proposed brick cladding creates a robust but homely feel to the buildings which is welcomed, however, particular care will need to be given to the detailing so as not to undermine the elegance of the architecture

Inclusive design

42 The applicant sets out for both developments that all units will meet Lifetime Homes Standards and that 10% will be wheelchair adaptable. The units should be distributed across tenure types and flat sizes to give disabled and older people similar choices to non disabled people (unless the Council through its Accessible Housing Register work can advise on the need in this part of the borough for a particular size of wheelchair accessible unit). A schedule of units setting out tenure types and flat sizes should be provided.

43 With regard to City Pride the raised table along Marsh Wall should have suitable tactile paving (metal studs are not suitable due to their lack of slip resistance) to differentiate the edge of the footway and the carriageway. The applicant should confirm that all playspace is accessible to disabled children and further explanation is needed of the ramped access to the amenity pavilion roof level/playspace.

44 With regard to Island Point the blue badge parking should be amended so that the spaces are located nearest to the lift. The applicant should investigate if there is scope to further reduce the gradient of the entry ramps into the site. The wheelchair units off Westferry Road do not appear to be accessible. The applicant should provide further explanation of how these units will be accessed. Lifetime neighbourhood principles have not been applied to the upper level maisonettes and as such further consideration should be given to reservation of a space for a lift in the future.

Sustainable development

Climate change adaptation

City Pride

Flood risk

45 The site is within Zone 3, a flood risk appraisal (FRA) should be provided. The site is protected from flooding to a high standard by the Thames Barrier and associated river walls. However, it is important that the development addresses the residual risk of flooding, especially given the presence of basement parking areas. Such measures should include:

- Subscription to the Environment Agency Flood Warning Service;

- Drawing up a flood emergency plan for each building;
- Providing safe refuge within the buildings as it is unlikely that a suitable dry access route will be available in the event of a flood;
- Ensuring that the buildings remain safe and comfortable in the event of a flood, this should include ensuring that all utility services can be maintained operational during a flood, for example by placing vital services, such as electricity supplies, lift power and control gear, in flood-proof enclosures;
- A sump within the basement to aid the removal of floodwater.

46 These measures should be secured by an appropriate planning condition in order for the development to comply with London Plan Policy 5.12 Flood Risk.

Surface Water Run-off

47 The FRA should include ways of reducing surface water discharge from the site. Given the proximity of the River Thames and Docks, it should be feasible to discharge clean rainwater to one of those waterbodies rather than the local sewer system.

48 The FRA should set out how the proposals comply with the London Plan Sustainable Drainage hierarchy contained within Policy 5.13. These measures should be secured via an appropriate planning condition

Island point

Flood risk

49 The flood risk assessment (FRA) confirms that the site is within Flood Zone 3 but is protected to a high standard by the Thames Barrier and associated tidal flood walls.

50 There remains a residual risk of flooding from overtopping or breach of the flood defences and the FRA has investigated this.

51 The development proposes to raise the ground level of the site above any likely flood level. The basement parking area access will also be raised however care should be taken as flood water could also enter the basement through any ventilation, drainage or other opening and this could present a significant hazard to anyone in the basement at the time of any flooding.

52 The FRA also recommends that occupants stay within the building during any flood. This is the preferred approach in this location as it is likely that any dry land will be some distance away. However in order to enable this the building must be designed to remain both safe and comfortable for those occupants using some or all of the following measures:

- Subscription to the Environment Agency Flood Warning Service;
- Drawing up a flood emergency plan for each building;
- Providing safe refuge within the buildings as it is unlikely that a suitable dry access route will be available in the event of a flood;
- Ensuring that the buildings remain safe and comfortable in the event of a flood, this should include ensuring that all utility services can be maintained operational during a flood, for example by placing vital services, such as electricity supplies, lift power and control gear, in flood-proof enclosures;
- A sump within the basement to aid the removal of floodwater.

53 These more detailed measures should be secured by an appropriate planning condition in order for the development to comply with London Plan Policy 5.12 Flood Risk.

Surface Water Run-off

54 The FRA proposes to reduce the surface water run-off by 50% however, the measures to achieve this are not clearly set out in the FRA.

55 This approach should be regarded as the minimum necessary to comply with the Sustainable Drainage Hierarchy within London Plan policy 5.13 and the measures should be specified and secured via an appropriate planning condition.

Climate change mitigation

City pride

56 The applicant has followed the energy hierarchy and is proposing to reduce carbon dioxide emissions by 31%, thus exceeding the London Plan requirement, which is welcomed. The development will reduce regulated carbon dioxide emissions by 7% below those of a 2012 Building Regulations compliant development through energy efficiency alone. The applicant should set out how the demand for cooling will be minimised. The applicant has identified that the neighbouring Landmark development has an existing combined heat & power (CHP) unit and is proposing to connect to this via a thermal header with a plate heat exchanger and primary pump. The applicant should provide evidence of correspondence with Landmark's network operator and confirmation that this CHP has the capacity to serve this development. The applicant should confirm that all building uses will be connected to the site heat network.

57 The applicant is proposing to install a 160 kW_t gas fired CHP unit as the secondary heat source for the site heat network. The CHP is sized to provide (with the Landmark development CHP) the domestic hot water load, as well as a proportion of the space heating. A reduction in regulated carbon dioxide emissions of 25% will be achieved through this second part of the energy hierarchy.

58 The applicant has investigated the feasibility of a range of renewable energy technologies but is not proposing to install any renewable energy technology for the development. This is acceptable in this instance.

Island Point

59 The applicant has followed the energy hierarchy and is proposing to reduce carbon dioxide emissions by 31%, thus exceeding the London Plan requirement, which is welcomed. The development will reduce regulated carbon dioxide emissions by 4% below those of a 2012 Building Regulations compliant development through energy efficiency alone. The applicant has carried out an investigation and there are no existing or planned district heating networks within the vicinity of the proposed development. The applicant should, however, provide a commitment to ensuring that the development is designed to allow future connection to a district heating network should one become available.

60 The applicant is proposing to install a site heat network and it should confirm that the community building will be connected to the heat network. A drawing showing the route of the heat network linking all buildings on the site should be provided.

61 The applicant is proposing to install a 50 kW_t gas fired CHP unit as the lead heat source for the site heat network. The CHP is sized to provide the domestic hot water load. A reduction in regulated carbon dioxide emissions of 26% will be achieved through this second part of the energy hierarchy.

62 The applicant has investigated the feasibility of a range of renewable energy technologies and is proposing to install 100 sq.m. of solar photovoltaic (PV) panels at roof level on the tallest part of the building. A drawing showing the proposed location has been provided. A reduction in regulated carbon emissions of 2% will be achieved through this third element of the energy hierarchy.

Transport

City Pride

Car parking

63 The proposed parking provision of 41 spaces is in line with the London Plan and the Council's standards and is therefore deemed acceptable by TfL.

64 No specific details have been included regarding electrical vehicle charging points (EVCP) or blue-badge parking however, the applicant has given TfL assurances that these will both be provided for the scheme in line with London Plan policy. The applicant should set out the level of blue badge parking proposed.

Cycle Parking

65 TfL also welcomes the total provision of 915 cycle parking spaces for both the residential and serviced apartments aspects of the scheme, which is in line with London Plan and borough standards. The applicant should however confirm that the spaces will be sheltered and secure.

66 No provision is given for the retail element of the scheme. Secure parking must be provided for staff, as well as spaces for visitors to the retail units; the number of spaces will be determined by the type of retail use established. The applicant is reminded that shower and locker facilities should be available for staff who wish to commute by bicycle in line with London Plan policy 6.9 (Cycling).

Trip Generation

67 TfL welcomes the comparison between selected comparable TRAVL sites and the applicant's own surveys. Mode share has been based on 2001 census data with adjustments made to reflect the lower car parking provision and changes to patterns of travel and public transport provision, primarily increased bus use, since 2001. This is deemed acceptable by TfL.

Walking and Cycling

68 TfL welcomes the submission of a pedestrian environment review system (PERS) audit, as requested during pre-application discussions with TfL.

69 In its pre-application advice, TfL identified the footway along Westferry Road, adjacent to the site, as being both narrow and constrained and subsequently expect it to be widened, repaved and adopted by Tower Hamlets Council. However, the PERS assessment of this specific link surprisingly received a positive score. This is questioned by TfL and should therefore be reassessed.

70 Similarly, no mention of the need for de-cluttering has been made in the PERS audit. As discussed at the pre-application meeting, in order to accommodate additional walking trips from

this development, any unnecessary clutter (such as guardrail and bollards) on both Westferry and Marsh Wall road should be removed at the applicant's expense in line with London Plan policy 6.10 (Walking).

Cycle Hire

71 While TfL acknowledges that there are three cycle hire docking stations available within walking distance of the site, demand is expected to be very high in this specific location. TfL is nevertheless currently assessing what impact this development may have on the cycle hire network and will advise accordingly in due course. Depending on the output TfL might be seeking for land and/or section 106 funding towards the scheme expansion.

Highway Impact

72 It is accepted that the highway impact resulting from the redevelopment will be minimal given the low number of anticipated car trips. Notwithstanding this, TfL request a condition requiring any road closures related to construction activities be agreed by TfL to ensure that the operation of the bus network along the busy Westferry Road corridor is not affected.

Bus

73 The redevelopment is forecast to generate 44 outbound trips in the AM peak and 24 inbound in the PM peak. Considering the scale and impact of the previous proposals for the site (61 bus trips from 430 units) in 2008, TfL is concerned that this seems disproportionately low. The applicant is therefore encouraged to revise the assessment by cross-checking the trip generation data with the 2011 census to address this.

74 Notwithstanding the above, the applicant's argument that the proposals will have no impact on the local bus network cannot be accepted as the assessment presented is not considered to be a meaningful way of assessing the impact of the development. Rather than assuming the maximum capacity of the bus network in both directions, planning capacity of circa 80% of total capacity in each direction should be considered to allow for daily fluctuations and growth over the lifetime of a contract. Furthermore, TfL considers that it is bus demand generated by the development as a proportion of spare capacity that is most relevant.

75 Capacity problems on Westferry Road northbound in the morning peak have been identified by TfL. This will be in part due to the impact of various developments that have opened on the Isle of Dogs and especially in the Millennium Quarter.

76 The trips generated by this development plus other developments (including Island Point) will likely generate a need for further capacity on the bus network beyond that funded by contributions secured from other completed developments.

77 TfL therefore seeks the same contribution secured for the previous planning permission on this site, which is £200,000. This in line with London Plan policy 6.2 (Providing public transport capacity and safeguarding land for transport).

78 Although it is unlikely that development will impact on the operation of existing bus stops in the vicinity, TfL seek a condition that prohibits the developer from altering any bus stops without prior consent from TfL's Bus Infrastructure team.

Docklands Light Rail (DLR)

79 The development will generate a significant amount of new trips onto the DLR, with up to 144 trips to be made through Heron Quays station in the AM Peak Hour.

80 Whilst Heron Quays station was reconstructed in conjunction with the adjacent office development in 2002, at that time, there were little trip origins to the west of the station. As such, the station signage and wayfinding is focussed on the area east of the station, with the interchange to the Jubilee line. There is no visible station identification from the west. Given that this development relies to a considerable amount on new passenger journeys through this station, TfL seeks a contribution of £100,000 to support the provision of wayfinding and enhanced station identification in line with London Plan policy 6.1 (Strategic approach). This money will enable a large DLR roundel and associated signage to be installed, identifying the station.

81 Furthermore, in order to support the travel plan's targets to maximise the use of sustainable transport to and from the development, TfL requests a contribution of up to £20,000 to install real-time DLR departure screens in communal areas of the development. These screens would show departures from Heron Quays station and allow residents to accurately time their walk to the station.

Travel plan, delivery and servicing plan and construction logistics plan

82 TfL welcomes the submission of a travel plan which is in accordance with TfL's guidance.

83 A delivery & servicing plan (DSP) should be submitted for the local authority and TfL's approval prior to the occupation of the site. The DSP should ensure highway and traffic impact resulting from servicing activities should be kept to the minimum. The submission of the DSP should also be secured by condition.

84 A construction logistics plan (CLP) should also be submitted for TfL and the local authority's approval prior to construction works commencing on site. Given the site's location, efforts should be made to utilise the river as much as possible during construction as per London Plan policy 7.24 (Blue Ribbon Network). This should be secured by condition.

Crossrail SPG

85 In view of the strategic regional importance of Crossrail to London's economic regeneration and development, and in order to bring the project to fruition in suitably timely and economic manner, contributions will be sought from development likely to add to or create congestion on London's rail network that Crossrail is intended to mitigate. This will be through planning obligations, arrangements for the use of which are established at strategic level in accordance with relevant legislation and policy guidance (London Plan policy 6.5 (Funding Crossrail and other strategically important transport infrastructure)).

86 The approach for collecting contributions towards Crossrail is set out in the Crossrail SPG. It states that contributions should be sought in respect of hotel development which involves a net increase in floorspace of more than 500sqm (Gross External Area – GEA).

87 Serviced apartments are classed as hotel use under the SPG. As the proposed development falls within the Isle of Dogs contributions area, the level of charge is £82 per sq.m. for new hotel floorspace. As such, a contribution of £650,000 is required. For retail floorspace the charge is £119 per sq.m., which equates to £34,000 for this development. Therefore the total Crossrail SPG charge is £684,000.

88 Notwithstanding this, Crossrail contributions are secured either through the SPG or through the Mayoral Community Infrastructure Levy (CIL), with the higher contribution sought. The level of

contribution required in line with the SPG is likely to be less than that to be recovered through the Community Infrastructure Levy as further detailed below. The section 106 agreement accompanying any planning permission should be worded appropriately in this respect.

Community Infrastructure Levy (CIL)

89 In accordance with London Plan policy 8.3, the Mayor has introduced a London-wide Community Infrastructure Levy (CIL) that will be paid on commencement of most new development in Greater London. The Mayor's CIL will contribute towards the funding of Crossrail.

90 The Mayor has arranged boroughs into three charging bands. The rate for Tower Hamlets is £35 per sq.m. The required CIL is calculated by gross internal area (GIA) which should be confirmed by the applicant and the council once the components of the development have themselves been finalised.

91 London boroughs are also able to introduce CIL charges which are payable in addition to the Mayor's CIL. Tower Hamlets has yet to adopt a scheme, details of their progress can be found on the borough website.

Summary

92 TfL welcomes the principle of development at this site however the application should clarify the level of parking proposed, provide EVCP's in line with London Plan policy, confirm the level of blue badge parking, provide cycle parking for the retail element, the trip generation should be confirmed taking account of the 2011 census, further work is needed on the PERS assessment, further discussion is needed on the potential need for additional cycle hire provision, further discussion is needed on the impact on bus services and DLR (including a contribution to improve station signage) and CIL/Crossrail SPG tariff should be secured.

Island Point

Car Parking

93 The proposed car parking provision of 55 spaces for 173 units (0.3 per unit) is in line with the London Plan and Tower Hamlets standards', and is deemed acceptable by TfL.

94 Provision of electrical vehicle charging points (EVCP) is referenced in the policy section of the applicant's transport assessment (TA) although no proposals are included in the description of the development. The applicant is reminded that 20% active provision, in addition to 20% passive provision is required to comply with London Plan policy 6.13 (Parking). TfL suggests that this is secured by condition.

95 The applicant should set out the provision which is proposed for blue badge parking.

Cycle Parking

96 TfL welcomes the provision of 283 cycle parking spaces, which is in line with London Plan and borough standards. The applicant should however confirm that the spaces will be sheltered and secure as per London Plan policy 6.9 (Cycling).

Trip Generation

97 TfL welcomes the comparison between selected comparable TRAVL sites and the applicant's own surveys. Mode share has then been based on 2001 census data with adjustments made to reflect the lower car parking provision and changes to patterns of travel and public transport provision, primarily increased bus use, since 2001. This is deemed acceptable by TfL. However, since the application was submitted the 2011 census data has been released and TfL therefore recommends that the applicant checks the figures against this latest data to ensure a robustness.

Walking and Cycling

98 TfL welcomes the submission of a pedestrian environment review system (PERS) audit, as requested during pre-application discussions with TfL. The lack of signage and legibility on Route 1 (from the site to Mudchute station) was identified as an issue. Given the increased number of people who will be using the DLR, contributions towards adequate mitigation, including signage and lighting are encouraged as part of the section 106 agreement, in line with London Plan policy 6.10 (Walking). To this end TfL recommends introducing Legible London signage, a project which is being established throughout the Isle of Dogs. It is also paramount that public transport waiting areas are visible and well lit to ensure safety and reduce the potential for anti-social behaviour.

Cycle Hire

99 While TfL acknowledges that there are three cycle hire docking stations available within walking distance of the site, demand is expected to be very high in this specific location. TfL is nevertheless currently assessing what impact this development may have on the cycle hire network and will advise accordingly in due course. Depending on the output TfL might be seeking for land and/or section 106 funding towards the scheme expansion.

Bus

100 The transport assessment assumes a development of 173 residential units. This is forecast to generate eight outbound trips in the AM peak (4 inbound in the PM peak). This seems low, TfL would expect around double that figure. Indeed, Appendix K seems to suggest 16 outbound bus trips would be generated (i.e. 50% of 32 bus trips across the peak period 07.00-10.00). This is an example of where the applicant is encouraged to cross-check its trip generation data with that of the 2011 census data for the postcode/ward area.

101 Paragraph 10.1.3 argues that the eight trips have no impact on the bus network as it represents 0.26% of 3,124. This is not a meaningful way of assessing the impact of the development on the bus network. It is assumed that the figure of 3,124 is based on the maximum capacity of the bus network in both directions. TfL plans the network to a planning capacity of circa 80% of total capacity in each direction to allow for daily fluctuations and growth over the lifetime of a contract. Furthermore, it is bus demand generated by the development as a proportion of spare capacity that is most relevant.

102 There is currently a capacity problem on Westferry Road northbound in the morning peak. This is in part due to the impact of various developments that have opened on the Isle of Dogs and especially in the Millennium Quarter.

103 The trips likely to be generated by this development plus other developments (including City Pride) will likely generate a need for further capacity on the local bus network beyond that already funded by contributions secured from other completed developments. Alternatively there may be scope to provide new links to the Isle of Dogs through the introduction of a new route.

104 In line with the level of contributions requested from other residential developments on the Isle of Dogs, it is therefore requested that a section 106 contribution of £103,800 be secured towards bus capacity upgrades in line with London Plan policy 6.2 (Providing Public Transport Capacity and Safeguarding Land for Transport). This will fund extra vehicles and deliver higher frequency services.

Docklands Light Rail (DLR)

105 There are a number of inaccuracies found within the transport assessment and related to DLR services which will need to be addressed.

106 The separated trip generation mode share assumption presented for passengers on the Jubilee line is considered irrelevant as these trips should be incorporated into the DLR trip generation. This is mainly because passengers would have to travel four stops on the DLR to interchange to the Jubilee line (2.5km away) and are generally unlikely to walk this distance.

107 Taking the Jubilee line passengers into account, this results in a combined demand onto DLR services of 60 people in the AM Peak Hour. Therefore, TfL requires the applicant to contribute £30,000 to enhance the public realm at Island Gardens station in line with London Plan policy 6.1 (Strategic approach).

Travel plan, delivery and servicing plan and construction logistics plan

108 TfL welcomes the submission of a travel plan which is in accordance with TfL's guidance.

109 A delivery and servicing plan (DSP) should be submitted for the local authority and TfL's approval prior to the occupation of the site. The DSP should ensure highway and traffic impact resulting from servicing activities is kept to a minimum. The submission of the DSP should also be secured by condition.

110 A construction logistics plan (CLP) should also be submitted for TfL and the Council's approval prior to construction works commencing on site. Given the site's location, efforts should be made to utilise the river as much as possible during construction, in line with London Plan policy 7.24 (Blue Ribbon Network). This should be secured by condition.

Community Infrastructure Levy (CIL)

111 In accordance with London Plan policy 8.3, the Mayor has introduced a London-wide Community Infrastructure Levy (CIL) that will be paid on commencement of most new development in Greater London. The Mayor's CIL will contribute towards the funding of Crossrail.

112 The Mayor has arranged boroughs into three charging bands. The rate for Tower Hamlets is £35 per sq.m. The required CIL should be confirmed by the applicant and the council once the components of the development or phase thereof have themselves been finalised.

113 London boroughs are also able to introduce CIL charges which are payable in addition to the Mayor's CIL. Tower Hamlets has yet to adopt a scheme, details of their progress can be found on the borough website.

Summary

114 TfL welcomes the principle of development at this site however the application should provide EVCP's in line with London Plan policy, confirm the level of blue badge parking, the trip generation should be confirmed taking account of the 2011 census, the works identified in the

PERS assessment should be included in the section 106 agreement, further discussion is needed on the potential need for additional cycle hire provision, further discussion is needed on the impact on bus services and DLR, a delivery servicing plan and construction logistics plan should be secured by condition and CIL/Crossrail SPG tariff should be secured.

Local planning authority's position

115 Local planning authority officers are currently assessing the application.

Legal considerations

116 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, or issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application and any connected 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

117 There are no financial considerations at this stage.

Conclusion

118 London Plan policies on land-use principle, urban design, tall buildings/views, world heritage sites, inclusive design, housing, affordable housing, child playspace, density, noise, climate change mitigation, climate change adaptation and transport are relevant to this application. The application is generally acceptable in strategic planning terms however further discussion is needed, together with some consequent changes, on the issues set out below:

- **Principle of development:** Whilst the provision of a residential led development of these site is supported in principle further discussion is needed regarding the provision of social infrastructure in the wider area and associated section 106 contributions and the tenure of the donor site.
- **Housing:** the donor site proposal should be amended to include an element of market housing. The rented units should be affordable rented rather than social rented units. Further discussion is needed on viability.
- **Child playspace:** With regard to the Island Point site the applicant should set out the capacity of the off-site older children play spaces the development will rely upon and whether they are in need of upgrade.
- **Design:** With regard to the City Pride development further information is needed regarding the quality of the single aspect units together with illustrations of the route adjacent to the south of the tower to illustrate how the negative impact of the inactive frontage is being mitigated.

- **Inclusive design:** A schedule of units setting out tenure types and flat sizes should be provided. With regard to City Pride suitable tactile paving to differentiate the edge of the footway and carriageway along Marsh Wall should be provided. The applicant should confirm all playspace is accessible and provide further explanation of the ramped access to the amenity pavilion roof level/playspace. With regard to Island Point the blue badge parking should be amended so that the spaces are located nearest to the lift and the applicant should investigate if there is scope to further reduce the gradient of the entry ramps into the site. Further information is needed on how the wheelchair accessible units off Westferry Road are accessed. Further consideration should be given to reservation of a space for a lift in the future.
- **Sustainable development:** Further discussion and commitments are needed regarding flooding and drainage. The applicant should confirm that all building uses on the City Pride site will be connected to the site heat network and should provide evidence of correspondence regarding to connection to Landmark. The applicant should provide a commitment to ensuring that the development is designed to allow future connection to a district heating network should one become available, it should confirm the community building will be connected to the heat network and a drawing showing the route of the heat network should be provided.
- **Transport:** With regard to City Pride: TfL welcomes the principle of development at this site however the application should clarify the level of parking proposed, provide EVCP's in line with London Plan policy, confirm the level of blue badge parking, provide cycle parking for the retail element, the trip generation should be confirmed taking account of the 2011 census, further work is needed on the PERS assessment, further discussion is needed on the potential need for additional cycle hire provision, further discussion is needed on the impact on bus services and DLR (including a contribution to improve station signage) and CIL/Crossrail SPG tariff should be secured. With regard to Island Point: TfL welcomes the principle of development at this site however the application should provide EVCP's in line with London Plan policy, confirm the level of blue badge parking, the trip generation should be confirmed taking account of the 2011 census, the works identified in the PERS assessment should be included in the section 106 agreement, further discussion is needed on the potential need for additional cycle hire provision, further discussion is needed on the impact on bus services and DLR, a delivery servicing plan and construction logistics plan should be secured by condition and CIL/Crossrail SPG tariff should be secured.

for further information, contact Planning Decisions Unit:

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Development, Enterprise and Environment

██████████
London Borough of Tower Hamlets
Development & Renewal
Applications Team
Mulberry Place (AH)
Clove Crescent
London
E14 1BY

Our ref: D&P/2187b&2188b
Your ref: PA/13/03247
Date: 2 October 2013

Dear ██████████

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008
City Pride, 15 Westferry Road & Island Point, 443-451 Westferry Road
PA/13/03248 & PA/13/03247

I refer to your letter of 19 September 2013 informing me that Tower Hamlets Council is minded to grant for the above planning applications. I refer you also to the notice that was issued on 26 September 2013 under the provisions of article 5(1)(b)(i) of the above Order.

Having now considered a report on this case I am content to allow Tower Hamlets Council to determine the case itself, subject to any action that the Secretary of State may take, and do not therefore wish to direct refusal or to take over the application for my own determination.

The application represents EIA development for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011. I have taken the environmental information made available to date into consideration in formulating my decision.

Yours sincerely



Boris Johnson
Mayor of London

cc John Biggs, London Assembly Constituency Member
Nicky Gavron, Chair of London Assembly Planning Committee
National Planning Casework Unit, DCLG
Alex Williams, TfL
Agent, Julian Carter, GVA, 10 Stratton Street, W1J 8JR

2 October 2013

City Pride & Island Point, Isle of Dogs

in the London Borough of Tower Hamlets

planning application no. PA/12/03248 & PA/12/03247

Strategic planning application stage II 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 proposals

City Pride:

Erection of residential led mixed use 75 storey tower (239m AOD) comprising 822 residential units and 162 serviced apartments and associated amenity floors, roof terrace, basement car parking, cycle storage, plant and an amenity pavilion including retail.

Island Point:

Erection of buildings ranging in height from 3-5 storeys with rooftop pavilions rising to 6 storeys, providing 173 residential units with underground parking, open space, plant and associated community building.

The applicant

The applicant is **Charlegrove Property Ltd** and the architect is **Squires and Partners**.

Strategic issues

At consultation stage, the principle to deliver the two residential schemes was welcomed and was noted to be broadly in line with London Plan policy. The land use principle were accepted and the height of the buildings were also deemed as acceptable in relation to impact on strategic views; however, further discussion was needed on **residential quality, affordable housing, inclusive design, sustainable development** and **transport**. There has subsequently been further information provided in an attempt to resolve those issues, as detailed in this report.

The Council's decision

In this instance Tower Hamlets Council has resolved to grant permission.

Recommendation

That Tower Hamlets Council be advised that the Mayor is content for it to determine the case itself, subject to any action that the Secretary of State may take, and does not therefore wish to direct refusal or direct that he is to be the local planning authority.

Context

1 On 25 January 2013 the Mayor of London received documents from Tower Hamlets Council notifying him of two planning applications of potential strategic importance to develop the above sites for the above uses.

2 The City Pride application was referable to the mayor under Categories 1A, 1B and 1C of the Schedule to the Order 2008 as follows:

- Category 1A of the Schedule to the Order 2008: *“Development which comprises or includes the provision of more than 150 houses, flats or houses and flats.”*
- Category 1B *“Development (other than development which only comprises the provision of houses, flats or houses and flats) which comprises or includes the erection of a building or buildings in Central London (other than the City of London) with a total floorspace of more than 20,000 sq.m”*
- Category 1C *“Development which comprises or includes the erection of a building of one or more of the following descriptions, the building is more than 30 metres high and is outside of the City of London”*

3 The Island Point application is referable under Category 1A of the Schedule to the Order 2008, as follows:

- Category 1A of the Schedule to the Order 2008: *“Development which comprises or includes the provision of more than 150 houses, flats or houses and flats.”*

4 On 21 March 2013 the Mayor considered planning report PDU/2187b & 2188b/01, and subsequently advised Tower Hamlets Council that the application did not comply with the London Plan, for the reasons set out in paragraph 118 of the above-mentioned report; but that the possible remedies set out in this paragraph could address these deficiencies.

5 A copy of the above-mentioned report is attached. The essentials of the case with regard to the proposal, the site, case history, strategic planning issues and relevant policies and guidance are as set out therein, unless otherwise stated in this report. On 18 July 2013, Tower Hamlets Council decided that it was minded to grant planning permission and on 19 September 2013 it advised the Mayor of this decision. Under the provisions of Article 5 of the Town & Country Planning (Mayor of London) Order 2008 the Mayor may allow the draft decision to proceed unchanged, direct Tower Hamlets Council under Article 6 to refuse the application or issue a direction to Tower Hamlets Council under Article 7 that he is to act as the Local Planning Authority for the purposes of determining the application. The Mayor has until 7 October 2013 to notify the Council of his decision and to issue any direction.

6 The environmental information for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 has been taken into account in the consideration of this case.

7 The decision on this case and the reasons will be made available on the GLA's website www.london.gov.uk.

Update

8 At the consultation stage Tower Hamlets Council was advised that the application did not comply with the London Plan, for the reasons set out in paragraph 118 of the above-mentioned report; but that the possible remedies set out in this paragraph could address these deficiencies:

- **Principle of development:** Whilst the provision of a residential led development of these sites is supported in principle further discussion is needed regarding the provision of social infrastructure in the wider area and associated section 106 contributions and the tenure of the donor site.
- **Housing:** the donor site proposal should be amended to include an element of market housing. The rented units should be affordable rented rather than social rented units. Further discussion is needed on viability.
- **Child playspace:** With regard to the Island Point site the applicant should set out the capacity of the off-site older children play spaces the development will rely upon and whether they are in need of upgrade.
- **Design:** With regard to the City Pride development further information is needed regarding the quality of the single aspect units together with illustrations of the route adjacent to the south of the tower to illustrate how the negative impact of the inactive frontage is being mitigated.
- **Inclusive design:** A schedule of units setting out tenure types and flat sizes should be provided. With regard to City Pride suitable tactile paving to differentiate the edge of the footway and carriageway along Marsh Wall should be provided. The applicant should confirm all playspace is accessible and provide further explanation of the ramped access to the amenity pavilion roof level/playspace. With regard to Island Point the blue badge parking should be amended so that the spaces are located nearest to the lift and the applicant should investigate if there is scope to further reduce the gradient of the entry ramps into the site. Further information is needed on how the wheelchair accessible units off Westferry Road are accessed. Further consideration should be given to reservation of a space for a lift in the future.
- **Sustainable development:** Further discussion and commitments are needed regarding flooding and drainage. The applicant should confirm that all building uses on the City Pride site will be connected to the site heat network and should provide evidence of correspondence regarding the connection to Landmark. The applicant should provide a commitment to ensuring that the development is designed to allow future connection to a district heating network should one become available, it should confirm the community building will be connected to the heat network and a drawing showing the route of the heat network should be provided.
- **Transport:** With regard to City Pride: TfL welcomes the principle of development at this site however the application should clarify the level of parking proposed, provide EVCP's in line with London Plan policy, confirm the level of blue badge parking, provide cycle parking for the retail element, the trip generation should be confirmed taking account of the 2011 census, further work is needed on the PERS assessment, further discussion is needed on the potential need for additional cycle hire provision, further discussion is needed on the impact on bus services and DLR (including a contribution to improve station signage) and CIL/Crossrail SPG tariff should be secured. With regard to Island Point: TfL welcomes the principle of development at this site however the application should provide EVCP's in line with London Plan policy, confirm the level of blue badge parking, the trip generation should be confirmed taking account of the 2011 census, the works identified in the PERS

assessment should be included in the section 106 agreement, further discussion is needed on the potential need for additional cycle hire provision, further discussion is needed on the impact on bus services and DLR, a delivery servicing plan and construction logistics plan should be secured by condition and CIL/Crossrail SPG tariff should be secured.

9 The applicant has provided further information addressing the issues outlined above; paragraphs 10 to 38 below set out how the issues have been addressed.

Principle of development

10 At consultation stage, whilst the principle of residential use was accepted for both sites, further discussion was needed in relation to the provision of social infrastructure in the wider area and associated section 106 contributions. Confirmation was also needed regarding the tenure of the affordable units to be delivered at Island Point.

11 A financial contribution of over £3 million towards education facilities has been secured across the two application sites (£341,498 is proposed for City Pride and £2,734,636 from Island Point, equating to £3,076,134 in total).

12 In addition to this, as requested at Stage One Tower Hamlets have provided further information regarding school places. The Council's 'Planning for School Places 2012-2022' Report (September 2012) provides information on projected capacity for primary and secondary places, it concludes that in the short to medium term there will be a shortfall in primary spaces. It also concludes that whilst the demand for Secondary School places is rising there will be sufficient capacity for such provision. This report highlights that the Council will continue to investigate options for meeting the additional educational need across the Borough.

13 As an update, a Cabinet Report presented by Tower Hamlets Council officers on 11 September 2013 sets out the Council's demand for school places and the Borough's proposals for the expansion of schools.

14 The Council have indicated that the pressure for primary school places is greatest in Bow, Poplar and the Isle of Dogs and that opportunities for expanding primary schools in these areas is given priority by the Council. In terms of expected projection the Council highlights that there will be a need for 10 forms of entry of primary capacity needed by 2018/19 across the Borough.

15 Tower Hamlets has responded to the growth in need for primary places across the borough by identifying and implementing opportunities for expanding existing schools and for identifying potential sites for new schools in the longer term. The Council have stated that the annual projections and capacity for primary places will be kept under review.

16 The Council have made it clear that two primary schools within the Isle of Dogs area have been expanded to provide an extra 420 in total (30 more places in each school year, for each school) and an option for one form of entry expansion is being investigated at another school. Other schools within the E14 postcode have also been expanded or are have proposals in hand to expand. The Council acknowledges that the opportunities for further expansion at existing primary school sites in the Isle of Dogs are limited due to site capacity and that providing sufficient primary school places within this area will continue to be difficult, given the housing growth coming forward. In this regard, the Council has stated that planning officers will be reviewing the potential to provide additional primary school capacity on development sites coming forward.

17 Given the above and particularly noting the applicant's financial contribution, the development is acceptable in strategic terms.

18 Notwithstanding the above, Tower Hamlets Council should continue to be mindful of the cumulative impact this scheme and other housing developments on the Isle of Dogs is having on

existing social infrastructure, notably the provision of primary school places. On-going discussions will need to be continued separately regarding this strategic issue and the need to make greater provision for social infrastructure across the Isle of Dogs.

19 With regards to other social infrastructure (community and health) a total of £533, 838 has been secured as part of the section 106 legal agreement.

20 At Stage One, a concern was raised in relation to the 100% affordable housing provision proposed at the Island Point donor site. This site will be delivering two different tenure types, 18% will be intermediate housing (shared ownership units) and 82% will be affordable rented homes (63% of which will be rented at target rent levels); of the total provision 65% will be family homes, addressing a local priority need.

21 Since Stage One, both the applicant and the Council have provided further analysis in terms of the sites surrounding context. Using census data at ward levels, the make-up of household tenure types of the surrounding area has been identified, demonstrating that the immediate area has a relatively low proportion of social rented accommodation compared to the borough average and as such the introduction of a housing scheme which is a mix of rented accommodation and shared ownership units would not significantly undermine the existing mix of tenures that currently exist.

22 More specifically, using Super Output Area layer data (more specific than ward level data), it has been shown that in total, the proportion of social rented accommodation in the area would increase by 2% (from 17% to 19% respectively) as a result of the Island Point scheme being delivered. The level of intermediate accommodation would remain unchanged in the area as a result of the scheme being delivered.

23 Given the above, the off-site contribution is acceptable and will contribute to the development of mixed and balanced communities and provide affordable homes in line with local need; the scheme is acceptable and complies with London Plan policies 3.9 and 3.12.

Child playspace

24 Further information has been provided regarding the playspaces for older children in the surrounding area and these are of sufficient quality and have sufficient capacity. In addition contributions of £395, 803 from Island Point and £1,180,522 from City Pride are proposed in the section 106 agreement for public open space. The scheme now complies with London Plan policy 3.6.

Housing

25 At stage one, it was suggested that the Island Point proposal was amended to include an element of market housing to address concerns of the delivery of a 100% affordable scheme at this site. This issue has been dealt with in paragraphs 20 to 23 of this report and the scheme is satisfactory in this regard.

26 Since issuing the Stage One report, the applicant has clarified that all the units are in effect affordable rented units; all family units will be at target rent and the one and two bed units will be above target rent, which is welcomed. The Council commissioned an independent viability assessment and this has demonstrated that the maximum reasonable amount of affordable housing has been provided. The global offer is 37% and the viability assessment shows that 34% could be viably provided and that if all the rented affordable units were above target rent 35% affordable could be provided. In any case an increased offer of 37% is proposed and as such the offer is acceptable.

27 Sensitivity testing has been undertaken demonstrating that if the two schemes were delivered individually the combined total of affordable housing the schemes could deliver across both sites would be 27% compared to the 37% that is being proposed through the use of a donor site.

28 Given the range of affordable accommodation proposed on Island Point, the higher proportion of affordable homes being delivered through a 'donor site' approach and taking account of the previous planning permission, the tenure of the donor site is acceptable in this instance.

Design

29 The applicant has provided justification and further material for the quality of the single aspect units and the ground floor frontage in relation to the City Pride application; given the constraints of the site this is acceptable in in this instance.

Inclusive design

30 The applicant has submitted further information as requested at stage one and all the issues identified have been resolved. In addition the Council have secured appropriate planning condition relating to the quantum of wheelchair accessible units and Lifetime Homes.

Sustainable development

31 The applicant has confirmed that all uses will be connected to a site heat network and a drawing of the network has been provided. The applicant has also provided evidence of correspondence with the adjoining site. Further information has been provided with regards to surface water run-off and the applicant is investigating the possibility of directly discharging water into the dock. Notwithstanding this, the Council has secured appropriate planning conditions in this regard. The schemes are now compliant with the London Plan.

Transport for London's comments

City Pride

32 At Stage One TfL requested £100,000 for additional way finding signage at Heron Quays station, £304,120 for local highway and public realm improvements, £200,000 for bus capacity upgrades and payment of full Crossrail liability, all of which have been secured and included in the section 106 agreement. In addition to this, electrical vehicle charging points, a car-free development, and the travel plan have been secured. Both a delivery and servicing plan (DSP) and construction logistics plan (CLP) have been secured by the Council via planning condition. The applicant has also confirmed that staff cycle parking and shower and changing facilities will now be provided for the retail element of the scheme.

33 It has been agreed that the applicant will spend up to £20,000, (secured through the Section 106 agreement) on the installation of real time information screens and associated software. This arrangement is preferred to a financial contribution to TfL given the provision needs to be in the private foyer area to best serve residents.

34 TfL has confirmed that there is sufficient cycle hire capacity within this locality and thus the contribution previously sought is not necessary.

35 In summary, TfL considers that the transport impact of this development have been sufficiently mitigated to ensure conformity with the relevant London Plan policies.

Island Point

36 In response to the issues raised at Stage One, section 106 contributions of £103,800 towards bus capacity upgrades and £65,424 for public realm improvements around the site/Island Gardens DLR station have been secured in the section 106 agreement along with provisions for electrical vehicle charging points, a car-free development and a travel plan. Both a DSP and CLP have been secured by planning conditions.

37 TfL has confirmed that there is sufficient cycle hire capacity in the area and thus the contribution previously sought is not necessary.

38 In summary, TfL considers that the transport impact of this development has been sufficiently mitigated to ensure conformity with the relevant London Plan policies.

Response to consultation

City Pride

39 The application was subject to statutory formal consultation and 3,619 neighbouring properties/occupiers within the area were notified about the application. In response, a total of 124 responses were received; 2 letters of support and 122 letters objecting to the proposals were received. One petition with 35 signatures was also received. The objections included the following issues:

- Height of building is too tall and out of context with the Canary Wharf cluster
- Loss of daylight/sunlight to nearby residential buildings
- Excessive density proposed
- Traffic congestion implications and impacts of local parking levels
- The development will not deliver a mixed and balanced community
- Overdevelopment of the area
- Detrimental impact on residential amenity and views from residential units within Landmark Building
- Concerns of serviced apartment use
- Impact of noise and disruption during construction stages of development
- Unacceptable housing mix
- Possible implications of wind tunnel effects
- Impact on local facilities, services and utilities

40 Other statutory consultees responded as follows:

- Canal and River Trust: Objection made with regards to (including) the overbearing nature of the development, use of water freight should be considered, impact of noise a concern.
- Environment Agency: No objection subject to appropriate planning conditions

- English Heritage: No objection
- Greenwich Maritime World Heritage Site: raised concerns relating to scale of the building and the subsequent visual impact on the view from Greenwich WHS
- London Borough of Greenwich: No objection
- London Borough of Southwark: No objection
- London City Airport: No objection subject to appropriate conditions
- London Fire and Emergency Planning Authority: No objection subject to appropriate conditions
- London Underground Ltd: No comments received
- London Wildlife Trust: No comment
- Metropolitan Police: No objection subject to appropriate conditions
- National Air Traffic Services Ltd (NATS): No objection
- Natural England: No objection
- National Grid: No comment
- Thames Water: No objection subject to appropriate conditions

Island Point

41 The application was subject to statutory formal consultation and 340 neighbouring properties/occupiers within the area were notified about the application. In response, a total of 61 responses were received, all of which objected to the proposals. The objections included the following issues:

- Loss of daylight/sunlight to nearby residential buildings
- Traffic congestion implications and impacts of local parking levels
- The development will not deliver a mixed and balanced community
- The development will result in anti-social behaviour
- Impact on the Chapel House Conservation Area
- Over development of Isle of Dogs
- Insufficient capacity on local bus network and DLR services
- Insufficient social infrastructure and utilities to support development

42 Other statutory consultees responded as follows:

- Environment Agency: No objection subject to appropriate planning conditions

- English Heritage: No objection
- Greenwich Maritime World Heritage Site: No comment
- London Borough of Greenwich: No objection
- London Fire and Emergency Planning Authority: No objection
- London Underground Ltd: No comments received
- London Wildlife Trust: No comment
- Metropolitan Police: No objection subject to appropriate conditions
- Natural England: No objection
- National Grid: No comment
- Thames Water: No comment

43 In addition to the representations sent to the Council 96 responses were also sent directly to the Mayor, one letter of support was received and 95 representations objected to the proposals. One petition was also received from the Ocean Wharf 2000 Residents' Association. The objections included the following issues:

City Pride:

- Height and density of building is excessive
- Loss of daylight/sunlight to nearby residential buildings
- Traffic congestion implications and impacts of local parking levels
- The development will not deliver a mixed and balanced community
- Overdevelopment of the area
- Impact of noise and disruption during construction stages of development
- Impact on local facilities, services and utilities including health, education and open space

Island Point

- Traffic congestion implications and impacts of local parking levels
- The development will not deliver a mixed and balanced community being a 100% affordable scheme
- Over development of Isle of Dogs
- Insufficient capacity on local bus network and DLR services
- Insufficient social infrastructure and utilities to support development

44 Strategic issues raised by objectors in relation to the design have been considered in the stage one report and local issues have been considered in the Council's committee report.

Article 7: Direction that the Mayor is to be the local planning authority

45 Under Article 7 of the Order the Mayor could take over this application provided the policy tests set out in that Article are met. In this instance the Council has resolved to grant permission with conditions and a planning obligation, which satisfactorily addresses the matters raised at stage 1, therefore there is no sound planning reason for the Mayor to take over this application.

Legal considerations

46 Under the arrangements set out in Article 5 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor has the power under Article 6 to direct the local planning authority to refuse permission for a planning application referred to him under Article 4 of the Order. He also has the power to issue a direction under Article 7 that he is to act as the local planning authority for the purpose of determining the application and any connected application. The Mayor may also leave the decision to the local authority. In directing refusal the Mayor must have regard to the matters set out in Article 6(2) of the Order, including the principal purposes of the Greater London Authority, the effect on health and sustainable development, national policies and international obligations, regional planning guidance, and the use of the River Thames. The Mayor may direct refusal if he considers that to grant permission would be contrary to good strategic planning in Greater London. If he decides to direct refusal, the Mayor must set out his reasons, and the local planning authority must issue these with the refusal notice. If the Mayor decides to direct that he is to be the local planning authority, he must have regard to the matters set out in Article 7(3) and set out his reasons in the direction.

Financial considerations

47 Should the Mayor direct refusal, he would be the principal party at any subsequent appeal hearing or public inquiry. Government guidance in Circular 03/2009 (*'Costs Awards in Appeals and Other Planning Proceedings'*) emphasises that parties usually pay their own expenses arising from an appeal.

48 Following an inquiry caused by a direction to refuse, costs may be awarded against the Mayor if he has either directed refusal unreasonably; handled a referral from a planning authority unreasonably; or behaved unreasonably during the appeal. A major factor in deciding whether the Mayor has acted unreasonably will be the extent to which he has taken account of established planning policy.

49 Should the Mayor take over the application he would be responsible for holding a representation hearing and negotiating any planning obligation. He would also be responsible for determining any reserved matters applications (unless he directs the council to do so) and determining any approval of details (unless the council agrees to do so).

Conclusion

50 Further information has been provided to further support the principle of development, residential quality, affordable housing, inclusive design, sustainable development and transport matters, which together with planning conditions and section 106 legal agreement imposed by the Council, address the outstanding issues that were raised at stage one.

51 Having regard to the details of the two applications, the matters set out in Tower Hamlets committee report and its draft decision notice, the schemes are acceptable in strategic planning terms.

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City Pride & Island Point, Isle of Dogs**in the London Borough of Tower Hamlets****planning application no. PA/12/03248 & PA/12/03247****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

City Pride- Erection of residential led mixed use 75 storey tower (239m AOD) comprising 822 residential units and 162 serviced apartments and associated amenity floors, roof terrace, basement car parking, cycle storage, plant and an amenity pavilion including retail.

Island Point- erection of buildings ranging in height from 3-5 storeys with rooftop pavilions rising to 6 storeys, providing 173 residential units with underground parking, open space, plant and associated community building.

The applicant

Is **Charlegrove Property Ltd** and the architect is **Squires and Partners**.

Strategic issues

The development of these residential schemes is welcomed and is broadly in line with London Plan policy. The land use principle is accepted and the height of the buildings have an acceptable impact on strategic views. Further discussion is needed on residential quality, affordable housing, inclusive design, sustainable development and transport.

Recommendation

That Tower Hamlets Council be advised that the application is generally acceptable in strategic planning terms however further discussion is needed on the issues set out in paragraph 116.

Context

- 1 On 25 January 2013 the Mayor of London received documents from Tower Hamlets Council notifying him of planning applications of potential strategic importance to develop the above site for the above uses, and on 22 February 2013 amended documents were received. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor has until 4 April 2013 to provide the Council with a statement setting out whether he considers that the applications comply 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 City Pride application is referable under Category 1A, 1B and 1C of the Schedule to the Order 2008:
- Category 1A of the Schedule to the Order 2008: *“Development which comprises or includes the provision of more than 150 houses, flats or houses and flats.”*
 - Category 1B *“Development (other than development which only comprises the provision of houses, flats or houses and flats) which comprises or includes the erection of a building or buildings in Central London (other than the City of London) with a total floorspace of more than 20,000 sq.m”*
 - Category 1C *“Development which comprises or includes the erection of a building of one or more of the following descriptions, the building is more than 30 metres high and is outside of the City of London”*
- 3 The Island Point application is referable under Category 1A of the Schedule to the Order 2008.
- 4 Once Tower Hamlets Council has resolved to determine the applications, it is required to refer them back to the Mayor for his decision as to whether to direct refusal; take them over for his own determination; or allow the Council to determine them itself.
- 5 The environmental information for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 has been taken into account in the consideration of this case.
- 6 The Mayor of London’s statement on this case will be made available on the GLA website www.london.gov.uk.

Site description

- 7 The proposal comprises two sites. The first, the City Pride site at 15 Westferry Road is located to the west of West India Dock South. The site is bounded by the A1206 Westferry Road to the west, Marsh Wall to the east, a pump house to the north and the Landmark Development, a new high-rise residential development, to the south. The A1261 Aspen Way, which forms part of the Transport for London Road Network, is approximately 680 metres to the north.
- 8 The site is well served by public transport with Heron Quays DLR station 250 metres to the east and Canary Wharf DLR station 400 metres to the north-east. Canary Wharf underground station (Jubilee Line) is 520 metres to the east and South Quay DLR is 420 metres south-east of the site. Five bus routes: 277, D3, D7, D8, 135 and N50 are accessible from the site. Correspondingly, the public transport accessibility level of the site is 5 (on a scale where 6 is high and 1 is low).
- 9 The second, the Island Point site at 443-451 Westferry Road, is located towards the southern tip of the Isle of Dogs on the northern side of Westferry Road, west of Millwall Park. The site fronts directly onto the A1206 Westferry Road and is bounded by residential developments off Chapel House Street to the north and west. Residential apartments around Lockesfield Place lie immediately to the east of the site. The area is characterised by 2-storey dwelling houses and taller flatted developments.
- 10 The site is served by two DLR stations; Mudchute station, 450 metres north-east of the site and Island Gardens station, 500 metres to the east. The site is well served by buses with

three bus routes running along Westferry Road and two other routes serving stops on Spindrift Avenue and East Ferry Road. Other public transport infrastructure includes Canary Wharf Underground station 1.7 kilometres to the north, Greenwich National Rail station 1000 metres to the south, via the Greenwich Foot Tunnel, and Masthouse Terrace Pier (Thames Clipper), 500 metres west of the site. Correspondingly, the public transport accessibility level of the site is 3 (on a scale where 6 is high and 1 is low).

Details of the proposal

- 11 The proposal is for the development of both sites. The Island Point site will provide the majority of the affordable housing for the City Pride development. The development description is as follows:

City Pride

- 12 Erection of residential led mixed use 75 storey tower (239m AOD) comprising 822 residential units and 162 serviced apartments and associated amenity floors, roof terrace, basement car parking, cycle storage, plant and an amenity pavilion including retail. For comparison the height of 1 Canada Square is 235m AOD. The residential mix is as set out in the table below:

Unit size	Private	Intermediate	Total	%
Studio	176	2	178	21.5
1 bed	324	36	360	44
2 bed	212	32	244	30
3 bed	36	0	36	4
4 bed	4	0	4	0.5
Total	752	70	822	
%	91%	9%		

- 13 Island Point- erection of buildings ranging in height from 3-5 storeys with rooftop pavilions rising to 6 storeys, providing 173 residential units with underground parking, open space, plant and associated community building. The residential mix is as set out in the table below:

Unit size	Private	Intermediate	Social rented	Total	%
1 bed		9	11	20	12
2 bed		18	22	40	23
3 bed		4	73	77	44
4 bed		0	26	26	15
5 bed		0	10	10	6
Total		31	142	173	
%	0%	18%	82%		

Case history

- 14 In July 2008 the applicant sought permission for the erection of a 62-storey tower (214m AOD) and 14-storey podium at City Pride, comprising 430 residential units, a 209-bed hotel, 18 serviced apartments together with ancillary restaurants, conference facilities, health club and associated car and cycle parking. Permission was also sought for the erection of six buildings ranging in height from 2 to 8 storeys to provide 189 residential units with associated car and cycle parking. These applications were withdrawn by the applicant, after the Stage I consultation response had been issued, to allow for the alteration to the podium at City Pride (a reduction in height from 14 to 9 storeys and a revised footprint) (PDU ref. 2187 and 2188.)
- 15 In 2009 planning permission was granted for the following: City Pride – The erection of a part 9, part 62-storey tower comprising 430 residential units, 203-bed hotel with conference facilities, spa, swimming pool, gymnasium, reception and lounge bar. Island Point – The erection of six buildings ranging in height from 2 to 8 storeys comprising 189 residential units. (PDU ref. 2187a and 2188a). These applications were supported by the GLA. These applications have been technically implemented, but not built out.
- 16 A pre-application meeting was held on the current proposals in August 2012. The advice report set out that the principle of the proposal was supported but that further discussion was needed on design and affordable housing in particular.

Strategic planning issues and relevant policies and guidance

- 17 The relevant issues and corresponding policies are as follows:

- Housing *London Plan; Housing SPG; Housing Strategy; draft Revised Housing Strategy; Providing for Children and Young People's Play and Informal Recreation SPG;*
- Affordable housing *London Plan; Housing SPG; Housing Strategy; draft Revised Housing Strategy*
- Density *London Plan; Housing SPG;*
- Urban design *London Plan;*
- Mix of uses *London Plan*

- Regeneration *London Plan; the Mayor's Economic Development Strategy*
 - Transport *London Plan; the Mayor's Transport Strategy;*
 - Crossrail *London Plan; Mayoral Community Infrastructure Levy; Crossrail SPG*
 - Parking *London Plan; the Mayor's Transport Strategy*
 - Access *London Plan; Accessible London: achieving an inclusive environment SPG; Planning and Access for Disabled People: a good practice guide (ODPM)*
 - Tall buildings/views *London Plan, Revised View Management Framework SPG*
 - Historic Environment *London Plan; World Heritage Sites SPG; Circular 07/09*
 - Ambient noise *London Plan; the Mayor's Ambient Noise Strategy;*
 - Air quality *London Plan; the Mayor's Air Quality Strategy;*
 - Health *London Plan; Health Inequalities Strategy*
 - Education *London Plan*
 - Sustainable development *London Plan; Sustainable Design and Construction SPG; Mayor's Climate Change Adaptation Strategy; Mayor's Climate Change Mitigation and Energy Strategy; Mayor's Water Strategy*
- 18 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 Tower Hamlets Core Strategy 2010, the saved policies of the Tower Hamlets Unitary Development Plan 1998 and the 2011 London Plan.
- 19 The following are also relevant material considerations:
- The National Planning Policy Framework and Technical Guide to the National Planning Policy Framework;
 - The Managing Development Development Plan Document (submission version) which has been through EiP and for which the Inspector's report has been received;
 - The draft Revised Early Minor Alteration to the London Plan.

Principle of use

- 20 The City Pride site is located in the Isle of Dogs opportunity area, which is identified in the London Plan as being capable of accommodating at least 10,000 additional dwellings. Mixed-use developments and densities which support the Isle of Dogs interdependence with central London and the Central Activities Zone are also supported. The principle of a mixed-use redevelopment of the site is therefore acceptable in strategic planning terms in accordance with policy 2.13 of the London Plan.
- 21 The provision of residential accommodation on the Island Point site is supported by policies 3.3 and 3.4, which seeks to increase London's supply of housing. Policy 3.4 seeks to ensure that development proposals achieve the maximum intensity of use compatible with the local context and character, the design principles in chapter 7 of the London Plan and with public transport capacity. The principle of residential accommodation on this site is therefore acceptable.
- 22 The replacement of the hotel with serviced accommodation is not of strategic concern but this use must be conditioned to prevent it becoming permanent accommodation.

- 23 The principle of an off site donor site for affordable housing which was established under the extant planning permission is allowed for in the 2011 London Plan. This states in exceptional circumstances off site provision may be provided to secure efficient delivery of new affordable housing on sites identified elsewhere where it is possible to secure a higher level of provision, better address priority needs, especially for affordable family housing, secure a more balanced community and better sustain strategically important clusters of economic activity especially in parts of the CAZ and north of the Isle of Dogs. Notwithstanding that, the fact that the donor site now provides 100% affordable housing is a concern given that the London Plan promotes the development of mixed and balanced communities.
- 24 London Plan policy 3.7 sets out that large residential developments should be properly masterplanned to co-ordinate the provision of social, environmental and other infrastructure. Although it is accepted, given the small size of the site, that social infrastructure cannot be provided on-site further discussion is needed over section 106 contributions and provision in the wider area.

Housing

- 25 On the City Pride site only 4.5% family units are provided, and none of the intermediate units are family units, given the location, the typology of the development and the constraints of the site this is acceptable in this instance.
- 26 The Island Point Site is 100% affordable split 82%:18% social rented:intermediate. 65% of the units are family units. The London Plan promotes the development of mixed and balanced communities and whilst the level of family units is supported the fact that the development is 100% affordable is of some concern. The principle of the Island Point site being a donor site for the City Pride development was established by the extant permission however the current proposal should be amended to include an element of market housing. Further discussion is also needed regarding the rented housing proposed. These should be affordable rented units in line with Government policy.
- 27 The applicant has submitted a viability assessment with the application and this is being independently assessed by the Council. Further discussion will be needed on whether the maximum reasonable amount of affordable housing has been provided following the receipt of the independent assessment.

Child playspace

- 28 Using the Child Playspace SPG methodology the City Pride site generates a child yield of 60. As such 600 sq.m. of child playspace should be provided. 730 sq.m. of playspace is provided on-site for all age groups and this is welcomed.
- 29 Using the Child Playspace SPG methodology the Island Point site generates a child yield of 252. As such 2,520 sq.m. of child playspace should be provided. 2,298 sq.m. of playspace is provided on-site for 0-11's. No on-site playspace for over 12's is provided on-site and the applicant sets out that there are two playspaces for older children within 800m of the application site. The applicant should set out what the capacity of these spaces are and whether there is a need for upgrade to these spaces.

Density

- 30 Given the height of the development and the fact that the site is very small the density of the City Pride site will be well above the density range set out in the London Plan. The

applicant has not set out the density but officers estimate that it is in the region of 7,300 habitable rooms per hectare. Given the nature of the site, the character of the surrounding area and the overall design quality of the scheme this may be acceptable in this instance subject to satisfactory further information regarding residential quality being supplied as set out below.

- 31 The density of the Island Point site is 584 habitable rooms per hectare and this is in line with the London Plan density guidelines.

Urban design

City Pride

- 32 Pre-application comments for the design of the City Pride development raised a number of issues with the design of the scheme, in particular with the ground floor layout and the residential quality, whilst some of these issues have been addressed others have not which is disappointing.
- 33 Concerns were previously raised regarding the quality of the ground floor frontage facing Westferry Road, which included a significant stretch of inactive frontage which undermined the quality of the public realm along this stretch of the street. This has since been addressed by increasing the amount of retail frontage and consolidating the service access which is welcomed.
- 34 Similar issues were raised regarding the ground floor frontage of the south of the tower, which is inhabited by the sub-station and refuse store. This has not been addressed which is disappointing. The applicant is advised to provide illustrations of the route adjacent to this to illustrate how the negative impact of this is being mitigated.
- 35 At pre-application stage concerns were raised over the residential quality of the scheme, in particular regarding the high proportion of single aspect units and large number of units sharing communal space on each floor. Fire doors have since been included splitting the communal areas in two separate clusters of six and eight units which mitigates some of the issues of having many households sharing the same communal space, however for this to be effective the fire doors need to be alarmed so they are not used. The high proportion of single aspect units is a result of the large footprint of the tower. The applicant is asked to set out how the issues associated with single aspect units have been mitigated, in particular need for deep penetration of light into the units.
- 36 The proposed building will be one of the tallest buildings in the emerging cluster when seen from the south. However, its impact on protected views and world heritage sites has been explored and officers are satisfied the scheme will not have a detrimental impact on either when seen in the context of the emerging proposals for the area. Its simple massing and footprint creates an elegant building which is welcomed, however, particular care will need to be taken on ensuring the detailing of the building will be of the highest quality.
- 37 In conclusion, while the overall design of the scheme is acceptable, there is concern with the quality of the route along the southern edge of the building and the residential quality. The applicant is advised to address these issues.

Island Point

- 38 At pre-application stage it was set out that the proposal for Island Point was generally supported as the street based approach created a good quality public realm whilst providing high quality usable private open space. The frontage on to Westferry Road is particularly

welcomed, as it will contribute to improving the quality of the streetscape by providing a good level of enclosure and generating pedestrian activity that would rebalance the currently vehicular dominated environment.

- 39 Concerns were raised at pre-application stage regarding the lack of individual entrances to all ground floor apartments directly from the public realm, as suggested in the London Housing Design Guide. These have since been provided creating an active and safe streetscape which is strongly supported.
- 40 The provision of front entrances to ground floor units means that the residential elements of the scheme are of a high quality, with a good amount of private open space, a high percentage of dual aspect units and a generally well considered layout.
- 41 The height of the scheme is generally in keeping with the surrounding area and the massing is simple and elegant. The proposed brick cladding creates a robust but homely feel to the buildings which is welcomed, however, particular care will need to be given to the detailing so as not to undermine the elegance of the architecture

Inclusive design

- 42 The applicant sets out for both developments that all units will meet Lifetime Homes Standards and that 10% will be wheelchair adaptable. The units should be distributed across tenure types and flat sizes to give disabled and older people similar choices to non disabled people (unless the Council through its Accessible Housing Register work can advise on the need in this part of the borough for a particular size of wheelchair accessible unit). A schedule of units setting out tenure types and flat sizes should be provided.
- 43 With regard to City Pride the raised table along Marsh Wall should have suitable tactile paving (metal studs are not suitable due to their lack of slip resistance) to differentiate the edge of the footway and the carriageway. The applicant should confirm that all playspace is accessible to disabled children and further explanation is needed of the ramped access to the amenity pavilion roof level/playspace.
- 44 With regard to Island Point the blue badge parking should be amended so that the spaces are located nearest to the lift. The applicant should investigate if there is scope to further reduce the gradient of the entry ramps into the site. The wheelchair units off Westferry Road do not appear to be accessible. The applicant should provide further explanation of how these units will be accessed. Lifetime neighbourhood principles have not been applied to the upper level maisonettes and as such further consideration should be given to reservation of a space for a lift in the future.

Sustainable development

Climate change adaptation

City Pride

Flood risk

- 45 The site is within Zone 3, a flood risk appraisal (FRA) should be provided. The site is protected from flooding to a high standard by the Thames Barrier and associated river walls. However, it is important that the development addresses the residual risk of flooding, especially given the presence of basement parking areas. Such measures should include:

- Subscription to the Environment Agency Flood Warning Service;
- Drawing up a flood emergency plan for each building;
- Providing safe refuge within the buildings as it is unlikely that a suitable dry access route will be available in the event of a flood;
- Ensuring that the buildings remain safe and comfortable in the event of a flood, this should include ensuring that all utility services can be maintained operational during a flood, for example by placing vital services, such as electricity supplies, lift power and control gear, in flood-proof enclosures;
- A sump within the basement to aid the removal of floodwater.

46 These measures should be secured by an appropriate planning condition in order for the development to comply with London Plan Policy 5.12 Flood Risk.

Surface Water Run-off

- 47 The FRA should include ways of reducing surface water discharge from the site. Given the proximity of the River Thames and Docks, it should be feasible to discharge clean rainwater to one of those waterbodies rather than the local sewer system.
- 48 The FRA should set out how the proposals comply with the London Plan Sustainable Drainage hierarchy contained within Policy 5.13. These measures should be secured via an appropriate planning condition

Island point

Flood risk

- 49 The flood risk assessment (FRA) confirms that the site is within Flood Zone 3 but is protected to a high standard by the Thames Barrier and associated tidal flood walls.
- 50 There remains a residual risk of flooding from overtopping or breach of the flood defences and the FRA has investigated this.
- 51 The development proposes to raise the ground level of the site above any likely flood level. The basement parking area access will also be raised however care should be taken as flood water could also enter the basement through any ventilation, drainage or other opening and this could present a significant hazard to anyone in the basement at the time of any flooding.
- 52 The FRA also recommends that occupants stay within the building during any flood. This is the preferred approach in this location as it is likely that any dry land will be some distance away. However in order to enable this the building must be designed to remain both safe and comfortable for those occupants using some or all of the following measures:
- Subscription to the Environment Agency Flood Warning Service;
 - Drawing up a flood emergency plan for each building;
 - Providing safe refuge within the buildings as it is unlikely that a suitable dry access route will be available in the event of a flood;
 - Ensuring that the buildings remain safe and comfortable in the event of a flood, this should include ensuring that all utility services can be maintained operational during a flood, for example by placing vital services, such as electricity supplies, lift power and control gear, in flood-proof enclosures;
 - A sump within the basement to aid the removal of floodwater.

- 53 These more detailed measures should be secured by an appropriate planning condition in order for the development to comply with London Plan Policy 5.12 Flood Risk.

Surface Water Run-off

- 54 The FRA proposes to reduce the surface water run-off by 50% however, the measures to achieve this are not clearly set out in the FRA.
- 55 This approach should be regarded as the minimum necessary to comply with the Sustainable Drainage Hierarchy within London Plan policy 5.13 and the measures should be specified and secured via an appropriate planning condition.

Climate change mitigation

City pride

- 56 The applicant has followed the energy hierarchy and is proposing to reduce carbon dioxide emissions by 31%, thus exceeding the London Plan requirement, which is welcomed. The development will reduce regulated carbon dioxide emissions by 7% below those of a 2012 Building Regulations compliant development through energy efficiency alone. The applicant should set out how the demand for cooling will be minimised. The applicant has identified that the neighbouring Landmark development has an existing combined heat & power (CHP) unit and is proposing to connect to this via a thermal header with a plate heat exchanger and primary pump. The applicant should provide evidence of correspondence with Landmark's network operator and confirmation that this CHP has the capacity to serve this development. The applicant should confirm that all building uses will be connected to the site heat network.
- 57 The applicant is proposing to install a 160 kW_t gas fired CHP unit as the secondary heat source for the site heat network. The CHP is sized to provide (with the Landmark development CHP) the domestic hot water load, as well as a proportion of the space heating. A reduction in regulated carbon dioxide emissions of 25% will be achieved through this second part of the energy hierarchy.
- 58 The applicant has investigated the feasibility of a range of renewable energy technologies but is not proposing to install any renewable energy technology for the development. This is acceptable in this instance.

Island Point

- 59 The applicant has followed the energy hierarchy and is proposing to reduce carbon dioxide emissions by 31%, thus exceeding the London Plan requirement, which is welcomed. The development will reduce regulated carbon dioxide emissions by 4% below those of a 2012 Building Regulations compliant development through energy efficiency alone. The applicant has carried out an investigation and there are no existing or planned district heating networks within the vicinity of the proposed development. The applicant should, however, provide a commitment to ensuring that the development is designed to allow future connection to a district heating network should one become available.
- 60 The applicant is proposing to install a site heat network and it should confirm that the community building will be connected to the heat network. A drawing showing the route of the heat network linking all buildings on the site should be provided.

- 61 The applicant is proposing to install a 50 kW_t gas fired CHP unit as the lead heat source for the site heat network. The CHP is sized to provide the domestic hot water load. A reduction in regulated carbon dioxide emissions of 26% will be achieved through this second part of the energy hierarchy.
- 62 The applicant has investigated the feasibility of a range of renewable energy technologies and is proposing to install 100 sq.m. of solar photovoltaic (PV) panels at roof level on the tallest part of the building. A drawing showing the proposed location has been provided. A reduction in regulated carbon emissions of 2% will be achieved through this third element of the energy hierarchy.

Transport

City Pride

Car parking

- 63 The proposed parking provision of 41 spaces is in line with the London Plan and the Council's standards and is therefore deemed acceptable by TfL.
- 64 No specific details have been included regarding electrical vehicle charging points (EVCP) or blue-badge parking however, the applicant has given TfL assurances that these will both be provided for the scheme in line with London Plan policy. The applicant should set out the level of blue badge parking proposed.

Cycle Parking

- 65 TfL also welcomes the total provision of 915 cycle parking spaces for both the residential and serviced apartments aspects of the scheme, which is in line with London Plan and borough standards. The applicant should however confirm that the spaces will be sheltered and secure.
- 66 No provision is given for the retail element of the scheme. Secure parking must be provided for staff, as well as spaces for visitors to the retail units; the number of spaces will be determined by the type of retail use established. The applicant is reminded that shower and locker facilities should be available for staff who wish to commute by bicycle in line with London Plan policy 6.9 (Cycling).

Trip Generation

- 67 TfL welcomes the comparison between selected comparable TRAVL sites and the applicant's own surveys. Mode share has been based on 2001 census data with adjustments made to reflect the lower car parking provision and changes to patterns of travel and public transport provision, primarily increased bus use, since 2001. This is deemed acceptable by TfL.

Walking and Cycling

- 68 TfL welcomes the submission of a pedestrian environment review system (PERS) audit, as requested during pre-application discussions with TfL.
- 69 In its pre-application advice, TfL identified the footway along Westferry Road, adjacent to the site, as being both narrow and constrained and subsequently expect it to be widened, repaved and adopted by Tower Hamlets Council. However, the PERS assessment of this specific link surprisingly received a positive score. This is questioned by TfL and should therefore be reassessed.

- 70 Similarly, no mention of the need for de-cluttering has been made in the PERS audit. As discussed at the pre-application meeting, in order to accommodate additional walking trips from this development, any unnecessary clutter (such as guardrail and bollards) on both Westferry and Marsh Wall road should be removed at the applicant's expense in line with London Plan policy 6.10 (Walking).

Cycle Hire

- 71 While TfL acknowledges that there are three cycle hire docking stations available within walking distance of the site, demand is expected to be very high in this specific location. TfL is nevertheless currently assessing what impact this development may have on the cycle hire network and will advise accordingly in due course. Depending on the output TfL might be seeking for land and/or section 106 funding towards the scheme expansion.

Highway Impact

- 72 It is accepted that the highway impact resulting from the redevelopment will be minimal given the low number of anticipated car trips. Notwithstanding this, TfL request a condition requiring any road closures related to construction activities be agreed by TfL to ensure that the operation of the bus network along the busy Westferry Road corridor is not affected.

Bus

- 73 The redevelopment is forecast to generate 44 outbound trips in the AM peak and 24 inbound in the PM peak. Considering the scale and impact of the previous proposals for the site (61 bus trips from 430 units) in 2008, TfL is concerned that this seems disproportionately low. The applicant is therefore encouraged to revise the assessment by cross-checking the trip generation data with the 2011 census to address this.
- 74 Notwithstanding the above, the applicant's argument that the proposals will have no impact on the local bus network cannot be accepted as the assessment presented is not considered to be a meaningful way of assessing the impact of the development. Rather than assuming the maximum capacity of the bus network in both directions, planning capacity of circa 80% of total capacity in each direction should be considered to allow for daily fluctuations and growth over the lifetime of a contract. Furthermore, TfL considers that it is bus demand generated by the development as a proportion of spare capacity that is most relevant.
- 75 Capacity problems on Westferry Road northbound in the morning peak have been identified by TfL. This will be in part due to the impact of various developments that have opened on the Isle of Dogs and especially in the Millennium Quarter.
- 76 The trips generated by this development plus other developments (including Island Point) will likely generate a need for further capacity on the bus network beyond that funded by contributions secured from other completed developments.
- 77 TfL therefore seeks the same contribution secured for the previous planning permission on this site, which is £200,000. This in line with London Plan policy 6.2 (Providing public transport capacity and safeguarding land for transport).
- 78 Although it is unlikely that development will impact on the operation of existing bus stops in the vicinity, TfL seek a condition that prohibits the developer from altering any bus stops without prior consent from TfL's Bus Infrastructure team.

Docklands Light Rail (DLR)

- 79 The development will generate a significant amount of new trips onto the DLR, with up to 144 trips to be made through Heron Quays station in the AM Peak Hour.
- 80 Whilst Heron Quays station was reconstructed in conjunction with the adjacent office development in 2002, at that time, there were little trip origins to the west of the station. As such, the station signage and wayfinding is focussed on the area east of the station, with the interchange to the Jubilee line. There is no visible station identification from the west. Given that this development relies to a considerable amount on new passenger journeys through this station, TfL seeks a contribution of £100,000 to support the provision of wayfinding and enhanced station identification in line with London Plan policy 6.1 (Strategic approach). This money will enable a large DLR roundel and associated signage to be installed, identifying the station.
- 81 Furthermore, in order to support the travel plan's targets to maximise the use of sustainable transport to and from the development, TfL requests a contribution of up to £20,000 to install real-time DLR departure screens in communal areas of the development. These screens would show departures from Heron Quays station and allow residents to accurately time their walk to the station.

Travel plan, delivery and servicing plan and construction logistics plan

- 82 TfL welcomes the submission of a travel plan which is in accordance with TfL's guidance.
- 83 A delivery & servicing plan (DSP) should be submitted for the local authority and TfL's approval prior to the occupation of the site. The DSP should ensure highway and traffic impact resulting from servicing activities should be kept to the minimum. The submission of the DSP should also be secured by condition.
- 84 A construction logistics plan (CLP) should also be submitted for TfL and the local authority's approval prior to construction works commencing on site. Given the site's location, efforts should be made to utilise the river as much as possible during construction as per London Plan policy 7.24 (Blue Ribbon Network). This should be secured by condition.

Crossrail SPG

- 85 In view of the strategic regional importance of Crossrail to London's economic regeneration and development, and in order to bring the project to fruition in suitably timely and economic manner, contributions will be sought from development likely to add to or create congestion on London's rail network that Crossrail is intended to mitigate. This will be through planning obligations, arrangements for the use of which are established at strategic level in accordance with relevant legislation and policy guidance (London Plan policy 6.5 (Funding Crossrail and other strategically important transport infrastructure)).
- 86 The approach for collecting contributions towards Crossrail is set out in the Crossrail SPG. It states that contributions should be sought in respect of hotel development which involves a net increase in floorspace of more than 500sqm (Gross External Area – GEA).
- 87 Serviced apartments are classed as hotel use under the SPG. As the proposed development falls within the Isle of Dogs contributions area, the level of charge is £82 per sq.m. for new hotel floorspace. As such, a contribution of £650,000 is required. For retail floorspace the

charge is £119 per sq.m., which equates to £34,000 for this development. Therefore the total Crossrail SPG charge is £684,000.

- 88 Notwithstanding this, Crossrail contributions are secured either through the SPG or through the Mayoral Community Infrastructure Levy (CIL), with the higher contribution sought. The level of contribution required in line with the SPG is likely to be less than that to be recovered through the Community Infrastructure Levy as further detailed below. The section 106 agreement accompanying any planning permission should be worded appropriately in this respect.

Community Infrastructure Levy (CIL)

- 89 In accordance with London Plan policy 8.3, the Mayor has introduced a London-wide Community Infrastructure Levy (CIL) that will be paid on commencement of most new development in Greater London. The Mayor's CIL will contribute towards the funding of Crossrail.
- 90 The Mayor has arranged boroughs into three charging bands. The rate for Tower Hamlets is £35 per sq.m. The required CIL is calculated by gross internal area (GIA) which should be confirmed by the applicant and the council once the components of the development have themselves been finalised.
- 91 London boroughs are also able to introduce CIL charges which are payable in addition to the Mayor's CIL. Tower Hamlets has yet to adopt a scheme, details of their progress can be found on the borough website.

Summary

- 92 TfL welcomes the principle of development at this site however the application should clarify the level of parking proposed, provide EVCP's in line with London Plan policy, confirm the level of blue badge parking, provide cycle parking for the retail element, the trip generation should be confirmed taking account of the 2011 census, further work is needed on the PERS assessment, further discussion is needed on the potential need for additional cycle hire provision, further discussion is needed on the impact on bus services and DLR (including a contribution to improve station signage) and CIL/Crossrail SPG tariff should be secured.

Island Point

Car Parking

- 93 The proposed car parking provision of 55 spaces for 173 units (0.3 per unit) is in line with the London Plan and Tower Hamlets standards', and is deemed acceptable by TfL.
- 94 Provision of electrical vehicle charging points (EVCP) is referenced in the policy section of the applicant's transport assessment (TA) although no proposals are included in the description of the development. The applicant is reminded that 20% active provision, in addition to 20% passive provision is required to comply with London Plan policy 6.13 (Parking). TfL suggests that this is secured by condition.
- 95 The applicant should set out the provision which is proposed for blue badge parking.

Cycle Parking

- 96 TfL welcomes the provision of 283 cycle parking spaces, which is in line with London Plan and borough standards. The applicant should however confirm that the spaces will be sheltered and secure as per London Plan policy 6.9 (Cycling).

Trip Generation

- 97 TfL welcomes the comparison between selected comparable TRAVL sites and the applicant's own surveys. Mode share has then been based on 2001 census data with adjustments made to reflect the lower car parking provision and changes to patterns of travel and public transport provision, primarily increased bus use, since 2001. This is deemed acceptable by TfL. However, since the application was submitted the 2011 census data has been released and TfL therefore recommends that the applicant checks the figures against this latest data to ensure a robustness.

Walking and Cycling

- 98 TfL welcomes the submission of a pedestrian environment review system (PERS) audit, as requested during pre-application discussions with TfL. The lack of signage and legibility on Route 1 (from the site to Mudchute station) was identified as an issue. Given the increased number of people who will be using the DLR, contributions towards adequate mitigation, including signage and lighting are encouraged as part of the section 106 agreement, in line with London Plan policy 6.10 (Walking). To this end TfL recommends introducing Legible London signage, a project which is being established throughout the Isle of Dogs. It is also paramount that public transport waiting areas are visible and well lit to ensure safety and reduce the potential for anti-social behaviour.

Cycle Hire

- 99 While TfL acknowledges that there are three cycle hire docking stations available within walking distance of the site, demand is expected to be very high in this specific location. TfL is nevertheless currently assessing what impact this development may have on the cycle hire network and will advise accordingly in due course. Depending on the output TfL might be seeking for land and/or section 106 funding towards the scheme expansion.

Bus

- 100 The transport assessment assumes a development of 173 residential units. This is forecast to generate eight outbound trips in the AM peak (4 inbound in the PM peak). This seems low, TfL would expect around double that figure. Indeed, Appendix K seems to suggest 16 outbound bus trips would be generated (i.e. 50% of 32 bus trips across the peak period 07.00-10.00). This is an example of where the applicant is encouraged to cross-check its trip generation data with that of the 2011 census data for the postcode/ward area.
- 101 Paragraph 10.1.3 argues that the eight trips have no impact on the bus network as it represents 0.26% of 3,124. This is not a meaningful way of assessing the impact of the development on the bus network. It is assumed that the figure of 3,124 is based on the maximum capacity of the bus network in both directions. TfL plans the network to a planning capacity of circa 80% of total capacity in each direction to allow for daily fluctuations and growth over the lifetime of a contract. Furthermore, it is bus demand generated by the development as a proportion of spare capacity that is most relevant.
- 102 There is currently a capacity problem on Westferry Road northbound in the morning peak. This is in part due to the impact of various developments that have opened on the Isle of Dogs and especially in the Millennium Quarter.

- 103 The trips likely to be generated by this development plus other developments (including City Pride) will likely generate a need for further capacity on the local bus network beyond that already funded by contributions secured from other completed developments. Alternatively there may be scope to provide new links to the Isle of Dogs through the introduction of a new route.
- 104 In line with the level of contributions requested from other residential developments on the Isle of Dogs, it is therefore requested that a section 106 contribution of £103,800 be secured towards bus capacity upgrades in line with London Plan policy 6.2 (Providing Public Transport Capacity and Safeguarding Land for Transport). This will fund extra vehicles and deliver higher frequency services.

Docklands Light Rail (DLR)

- 105 There are a number of inaccuracies found within the transport assessment and related to DLR services which will need to be addressed.
- 106 The separated trip generation mode share assumption presented for passengers on the Jubilee line is considered irrelevant as these trips should be incorporated into the DLR trip generation. This is mainly because passengers would have to travel four stops on the DLR to interchange to the Jubilee line (2.5km away) and are generally unlikely to walk this distance.
- 107 Taking the Jubilee line passengers into account, this results in a combined demand onto DLR services of 60 people in the AM Peak Hour. Therefore, TfL requires the applicant to contribute £30,000 to enhance the public realm at Island Gardens station in line with London Plan policy 6.1 (Strategic approach).

Travel plan, delivery and servicing plan and construction logistics plan

- 108 TfL welcomes the submission of a travel plan which is in accordance with TfL's guidance.
- 109 A delivery and servicing plan (DSP) should be submitted for the local authority and TfL's approval prior to the occupation of the site. The DSP should ensure highway and traffic impact resulting from servicing activities is kept to a minimum. The submission of the DSP should also be secured by condition.
- 110 A construction logistics plan (CLP) should also be submitted for TfL and the Council's approval prior to construction works commencing on site. Given the site's location, efforts should be made to utilise the river as much as possible during construction, in line with London Plan policy 7.24 (Blue Ribbon Network). This should be secured by condition.

Community Infrastructure Levy (CIL)

- 111 In accordance with London Plan policy 8.3, the Mayor has introduced a London-wide Community Infrastructure Levy (CIL) that will be paid on commencement of most new development in Greater London. The Mayor's CIL will contribute towards the funding of Crossrail.
- 112 The Mayor has arranged boroughs into three charging bands. The rate for Tower Hamlets is £35 per sq.m. The required CIL should be confirmed by the applicant and the council once the components of the development or phase thereof have themselves been finalised.

- 113 London boroughs are also able to introduce CIL charges which are payable in addition to the Mayor's CIL. Tower Hamlets has yet to adopt a scheme, details of their progress can be found on the borough website.

Summary

- 114 TfL welcomes the principle of development at this site however the application should provide EVCP's in line with London Plan policy, confirm the level of blue badge parking, the trip generation should be confirmed taking account of the 2011 census, the works identified in the PERS assessment should be included in the section 106 agreement, further discussion is needed on the potential need for additional cycle hire provision, further discussion is needed on the impact on bus services and DLR, a delivery servicing plan and construction logistics plan should be secured by condition and CIL/Crossrail SPG tariff should be secured.

Local planning authority's position

- 115 Local planning authority officers are currently assessing the application.

Legal considerations

- 116 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, or issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application and any connected 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

- 117 There are no financial considerations at this stage.

Conclusion

- 118 London Plan policies on land-use principle, urban design, tall buildings/views, world heritage sites, inclusive design, housing, affordable housing, child playspace, density, noise, climate change mitigation, climate change adaptation and transport are relevant to this application. The application is generally acceptable in strategic planning terms however further discussion is needed, together with some consequent changes, on the issues set out below:
- **Principle of development:** Whilst the provision of a residential led development of these site is supported in principle further discussion is needed regarding the provision of social infrastructure in the wider area and associated section 106 contributions and the tenure of the donor site.

- **Housing:** the donor site proposal should be amended to include an element of market housing. The rented units should be affordable rented rather than social rented units. Further discussion is needed on viability.
- **Child playspace:** With regard to the Island Point site the applicant should set out the capacity of the off-site older children play spaces the development will rely upon and whether they are in need of upgrade.
- **Design:** With regard to the City Pride development further information is needed regarding the quality of the single aspect units together with illustrations of the route adjacent to the south of the tower to illustrate how the negative impact of the inactive frontage is being mitigated.
- **Inclusive design:** A schedule of units setting out tenure types and flat sizes should be provided. With regard to City Pride suitable tactile paving to differentiate the edge of the footway and carriageway along Marsh Wall should be provided. The applicant should confirm all playspace is accessible and provide further explanation of the ramped access to the amenity pavilion roof level/playspace. With regard to Island Point the blue badge parking should be amended so that the spaces are located nearest to the lift and the applicant should investigate if there is scope to further reduce the gradient of the entry ramps into the site. Further information is needed on how the wheelchair accessible units off Westferry Road are accessed. Further consideration should be given to reservation of a space for a lift in the future.
- **Sustainable development:** Further discussion and commitments are needed regarding flooding and drainage. The applicant should confirm that all building uses on the City Pride site will be connected to the site heat network and should provide evidence of correspondence regarding connection to Landmark. The applicant should provide a commitment to ensuring that the development is designed to allow future connection to a district heating network should one become available, it should confirm the community building will be connected to the heat network and a drawing showing the route of the heat network should be provided.
- **Transport:** With regard to City Pride: TfL welcomes the principle of development at this site however the application should clarify the level of parking proposed, provide EVCP's in line with London Plan policy, confirm the level of blue badge parking, provide cycle parking for the retail element, the trip generation should be confirmed taking account of the 2011 census, further work is needed on the PERS assessment, further discussion is needed on the potential need for additional cycle hire provision, further discussion is needed on the impact on bus services and DLR (including a contribution to improve station signage) and CIL/Crossrail SPG tariff should be secured. With regard to Island Point: TfL welcomes the principle of development at this site however the application should provide EVCP's in line with London Plan policy, confirm the level of blue badge parking, the trip generation should be confirmed taking account of the 2011 census, the works identified in the PERS assessment should be included in the section 106 agreement, further discussion is needed on the potential need for additional cycle hire provision, further discussion is needed on the impact on bus services and DLR, a delivery servicing plan and construction logistics plan should be secured by condition and CIL/Crossrail SPG tariff should be secured.

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