

Nine Elms Parkside, South London Mail Centre

in the London Borough of Wandsworth

planning application no. 2019/2250

Strategic planning application stage II referral

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

The proposal

Section 73 application for amendments to planning permission (2017/6762) for comprehensive redevelopment of the site in a series of seven plots with buildings up to 23 storeys to contain up to 1,950 units, 4,100 sqm of flexible retail, community and leisure floorspace, and a new primary school.

Amendments are proposed to the approved plans in relation to the maximum height, footprint, and design of the buildings in Plots A, E, F and G, an increase of 68 residential units, and amendments to the quantum/location of retail, leisure, community uses, parking and servicing.

The applicant

The applicant is **Royal Mail Group Ltd** and the architect is **Allies and Morrison LLP**.

Key dates

Stage 1 report: 29 July 2019

Committee meeting: 28 January 2020

Strategic issues

Principle of development: The amended scheme remains in line with the aspirations for the Vauxhall Nine Elms Battersea Opportunity Area, providing jobs and homes. As stated at Stage 1, the increase in residential floorspace is supported.

Affordable Housing: At Stage 1, the amendments proposed 35% affordable housing across the uplift of housing, which was supported. The scheme followed the viability tested route and an improved affordable housing offer resulted in respect of the proposals, with 47% affordable housing now proposed across the uplift as well as improved affordability. GLA Viability Officers have confirmed the revised proposal represents the maximum reasonable viable level of affordable housing and this has been secured by obligation within a draft Section 106 Legal Agreement.

Design: As set out at Stage 1, the amendments to Plots E, F and G are in broad accordance with the extant permission's design principles and do not raise strategic concerns.

Transport: While the proposals do not achieve the car free development which was requested at Stage 1, in this instance the amount of car parking proposed is accepted given that it is within the levels previously consented and offers a slight reduction to this. All strategic transport issues have been resolved and the proposed amendments are considered acceptable from a transportation perspective.

Outstanding issues with regards to **play space, energy and water** have been resolved.

The Council's decision

In this instance Wandsworth Council has resolved to grant permission subject to planning conditions and the completion of a new Section 106 legal agreement.

Recommendation

That Wandsworth 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 17 June 2019 the Mayor of London received documents from Wandsworth Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. This was referred to the Mayor under the following Categories of the Schedule to the Order 2008:

- 1A: Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats.
- 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 outside Central London and with a total floorspace of more than 15,0000 square metres.
- 1C(c): 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 the City of London.

2 On 29 July 2019, the Mayor considered planning report GLA/2694f/01, and subsequently advised Wandsworth Council that the application broadly complied with the London Plan, for the reasons set out in paragraph 71 of the above-mentioned report.

3 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 28 January 2020 Wandsworth Council decided that it was minded to grant planning permission subject to conditions and the completion of a legal agreement for the revised application, and on 28 April 2020 it advised the Mayor of this decision. Under the provisions of Article 5 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor may allow the draft decision to proceed unchanged, direct Wandsworth Council under Article 6 to refuse the application or issue a direction to Wandsworth Council under Article 7 that he is to act as the Local Planning Authority for the purposes of determining the application and any connected application. The Mayor has until 11 May 2020 to notify the Council of his decision and to issue any direction.

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

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

Consultation stage issues summary

6 At consultation stage, Wandsworth Council were advised that the application is broadly acceptable in strategic planning terms, however does not fully comply with the London Plan, with the reasons and remedies set out below.

- **Principle of use:** The masterplan remains in line with the aspirations for Vauxhall Nine Elms Battersea Opportunity Area, providing jobs and homes and jobs. The increase in residential floorspace is supported.

- **Affordable housing:** The amendments result in an uplift of affordable housing (35% across the uplift of units) which is supported. The application is not eligible to follow the Fast Track Route, as set out in draft London Plan Policy H6 and Mayor's Affordable Housing and Viability SPG and must follow the viability tested route. The applicant must submit a viability assessment to be robustly interrogated by GLA officers to ensure the scheme delivers the maximum quantum and affordability of affordable housing. The tenure of the additional affordable housing must be confirmed and must be secured by obligation in a Section 106 agreement.
- **Design and children's play space:** The amendments to Plots E, F and G are in broad accordance with the extant permission's design principles and do not raise strategic concerns. The minor increase in the linear park is supported however clarification of under 5's place space is required.
- **Climate change and Water:** A revised energy strategy is required to be submitted. The changes to water management in the Design Codes for Plots E, F and G have not been sufficiently justified. Further clarification is required.
- **Transport:** The reduction in car parking is welcomed, however further reduction in car parking should be sought. Mitigation measures secured on the extant permission must be retained and varied to reflect the revised scheme.

Strategic planning policy and guidance update

7 In December 2019, the Mayor published the London Plan Intend to Publish Version (December 2019) which should be taken into account on the basis explained in the NPPF.

8 On the 13 March 2020, the Secretary of State issued a set of Directions under Section 337 of the Greater London Authority Act 1999 (as amended) and, to the extent that they are relevant to this particular application, have been taken into account by the Mayor as a material consideration when considering this report and the officer's recommendation.

Application update

9 Since consultation stage, GLA officers have engaged in joint discussions with the applicant, the Council and TfL officers with a view to addressing the above matters. Furthermore, as part of Wandsworth Council's draft decision on the case, various planning conditions and obligations have been secured to address the above concerns and ensure that the development is acceptable in planning terms.

Principle of development

10 As set out at consultation stage, the decrease of the retail, community and leisure floorspace (442sqm) is considered minor in the context of the wider masterplan, which continues to provide 9,658sqm of floorspace for these uses, equating to a 4.4% decrease. This decrease in commercial floorspace does not raise any strategic concerns, nor does the redistribution of commercial units, and the principles of the masterplan remain acceptable and in accordance with the Vauxhall Nine Elms Battersea Opportunity Area (VNEB OA) and Central Activities Zone (CAZ) policy.

11 The principle of the proposed development continues to be supported in land use terms, as a mixed-use redevelopment of a brownfield site continues to be proposed; providing housing, commercial uses and a new school for the local area. The linear park

remains central to the proposals and ground floors remain activated through the proposal. As such, the masterplan remains in line with London Plan and draft London Plan objectives and policies for the CAZ and VNEB Opportunity Area, continuing to contribute towards the ambitious jobs and homes targets.

Housing

Affordable housing and viability

12 At Stage 1, the proposals sought to deliver 35% affordable housing on the uplift of residential accommodation. However, as the original permission did not meet the 35% Fast Track Route threshold and as the resulting changes would not result in the scheme meeting this threshold, the application was unable to follow the Fast Track Route, as described in paragraph 2.15 of the Mayor’s SPG and Policy H5 of the Intend to Publish London Plan. Therefore, the application proceeded down the viability tested route.

13 Consideration of the scheme under the viability tested route resulted in several discussions and agreement was reached between the applicant, the Council and the GLA regarding a number of viability inputs. These inputs included affordable housing values, ground rents on market housing, adjust the commercial space assumptions, car parking revenue, construction costs, private residential sales legal fees and profit levels. Amongst other considerations and amendments, the applicant agreed to a change from Affordable Rent tenure to London Affordable Rent in a revised affordable housing offer, and the values on this tenure assumption were agreed. The table below summarises the affordable housing agreed as a result of viability negotiations:

Affordable typology	Original viability offer	Revised viability offer
Affordable rent by unit	76	-
Intermediate rent by unit	30	-
London Affordable Rent by unit	-	106
Shared ownership by unit	22	30
Total affordable housing units	128	136
Summary	70 Affordable Rent units in Blocks E4 and F1 30 Intermediate Rent units in Block F1 22 Shared Ownership units	Blocks E4 and F1 affordable blocks switched to solely 106 units of London Affordable Rent 30 Shared Ownership units
Percentage of uplift as affordable housing	35%	47%
Percentage by habitable room	18%	18.8%
Tenure split (by habitable room)	60:40	81 (LAR) / 19 (Shared Ownership)

14 As detailed in the table above, the revised affordable housing offer of 106 London Affordable Rent (LAR) and 30 Shared Ownership flats, equates to a tenure split of 81%

London Affordable Rent: 19% Shared Ownership. The affordable housing has been increased to 47% of the uplift in residential units.

15 GLA Officers have reviewed all the viability information now provided and consider that the viability testing now complies with government's and Mayor's recommended guidance and has been evidenced to an acceptable level.

16 In accordance with Policies H5 of the Mayor's Intend to Publish London Plan and the Mayor's Affordable Housing and Viability SPG, the delivery of additional affordable housing units have been secured via a draft new Section 106 agreement. This secures affordability criteria, early and late viability review mechanisms for the additional affordable housing units to incentivise timely delivery and ensure that the scheme would deliver the maximum level of affordable housing through to the delivery stage. All other affordable housing clauses from the existing Section 106 agreement have been retained.

Children's playspace

17 At consultation stage, further details in respect of the playspace proposals was requested. The applicant provided information detailing that 4,108 sqm of playspace is proposed for the children of Plots F and G, complying with London Plan and the Mayor's Intend to Publish London Plan requirements to provide 1167.00 sq.m. overall, and that 3,883 sqm is proposed for the children of Plot E, surpassing the overall requirement of 1192.00 sqm within that Plot. The relevant plan has been secured on the decision notice. The amended Design Codes seek to accommodate any under provision of children's play space for Plots E, F and G within the adjacent Linear Park and the detail of this will be assessed as part of the Reserved Matters applications for the relevant plots.

18 Doorstep playable spaces for children under 5 years of age are provided at podium level or publicly accessible locations where applicable, and all the proposed local playable spaces (for children 5-11years) and neighbourhood playable space (for children of all ages) are provided in publicly accessible locations, including within the linear park. On this basis, GLA Officers are satisfied that the proposals will not be segregated by tenure, in accordance with Policy S4 of the Intend to Publish London Plan.

Residential quality

19 The amendments to plan layouts do not present any strategic residential quality concerns, and overall the proposal responds positively to the Mayor's Intend to Publish London Plan policies in optimising development and delivering good growth. As requested at Stage 1, conditions on the extant planning permission have been secured by the Borough that ensure a satisfactory level of residential accommodation is provided within the development.

Urban design and heritage

20 As set out at Stage 1, the changes proposed to the parameters within this application are generally consistent with the principles established in the approved masterplan and do not raise strategic design concerns. Using parameter plans and design codes, the proposed development continues to provide for a high-quality urban development which contributes positively to the wider VNEB OA. As requested, relevant

conditions and design codes have are secured on the draft planning permission to ensure the appearance and architectural form of the development is of a high quality and co-ordinated design.

21 As set out at Stage 1, having regard to the statutory duty in respect of listed buildings in the Planning (Listed Buildings and Conservation Areas) Act 1990, and the relevant paragraphs in the NPPF in relation to listed buildings and conservation areas, GLA officers remain satisfied that the revised scheme would not harm the setting of the nearby listed buildings and conservation areas as well as the setting of the Westminster World Heritage site (a heritage asset of the highest importance). GLA Officers consider the proposal accords with Policy 7.8 of the London Plan and Policy HC1 of the Mayor's Intend to Publish London Plan, and London World Heritage Sites SPG.

Energy

22 At Stage 1, an updated energy statement was requested to confirm how the design proposal is meeting the carbon targets and follows the heat hierarchy.

23 A revised energy assessment was provided to GLA Officers for review. While the GLA Energy Team have a number of unresolved queries relating to the energy strategy for the development, GLA Officers recognise that there is further information to be submitted to the Council as part of compliance with the relevant energy conditions and obligations (including draft Condition 2 and 33, and Part 7: Energy of the draft Section 106 legal agreement). The draft Section 106 legal agreement also requires the developer to work with the GLA as part of the development of the district heat network strategy. On balance, in this instance, GLA Officers find this an acceptable solution to ensure compliance with the policies of the London Plan and Intend to Publish London.

Water

24 At Stage 1, clearer justification was requested as to why the proposed changes to the design code are necessary from a drainage perspective. Technical information was submitted to the satisfaction of GLA Officers. The proposals accord with the drainage and flood risk policies of the London Plan and Mayor's Intend to Publish London.

Transport

25 At Stage 1 it was recommended that the development should be 'car free' for compliance with Policy T6 of the Mayor's Intend to Publish London Plan. The proposals seek to provide 0.28 car parking spaces per unit for Plot E, and 0.25 car parking spaces per unit for Plot F and G. While the proposals do not achieve a car free development, in this instance the amount of car parking proposed is accepted given that it is within the levels previously consented (0.3 spaces per unit) and offers a slight reduction to this.

26 No further transport mitigation is requested above the contributions secured in the Section 106 legal agreement for the consented development. Conditions have been secured for the proposed cycle parking, provision of electric vehicle charging, a Delivery and Servicing Plan, and Construction Logistics Plan as requested.

27 Overall, there are no outstanding strategic transport issues, and the proposed amendments are considered acceptable from a transportation perspective.

Response to consultation

28 Wandsworth Council publicised the application by site and press notices, and sent letters advising of the application to 1,691 adjoining occupiers. A total of 4 representations responses were received which raised objection and support to the scheme in relation to the following:

- Change in height is a major amendment and will adversely impact the light, view and wellbeing of existing residents.
- Joining the proposed buildings will have a significant impact on light, open space, canyon effect from wind and air quality.
- Notification of proposed amendments to proposals: indecipherable and unhelpful for residents to engage.
- Concern for the reduction in green spaces.
- Safe traffic management, existing issues with car parking on New Mill Road.
- Good for the future.

29 Responses from statutory bodies and other organisations:

- **Historic England:** No comment.
- **Historic England (Greater London Archaeological Advisory Service):** No archaeological requirement.
- **Environment Agency:** No objection.
- **Natural England: No comment on conditions 9, 10, 34 and 52.**
- **Network Rail:** No comment.
- **Safeguarding/BAA – Heathrow Airport:** No safeguarding objections to the proposed development. Provided advice note in respect of wind turbines.
- **Royal Borough of Kensington and Chelsea:** Recommend informative is imposed in respect of construction works and transport impacts.
- **City of Westminster:** No comment.
- **Battersea Society:** Object to design and placement of office development within Plot A as one of the key gateways to the linear park. A number of concerns with Blocks E and F that principally relate to the cumulative effect of changes of increasing density and bulk; reducing liveability and increasing pressure on public infrastructure. Object to inadequacy of plans for access for taxis and deliveries. Concern for light and canyon-like environment for some areas of open space, drop off point for Blocks E and F and façade treatment. Provided extensive detail and comment on the development and delivery of the linear

30 Having considered the responses to public consultation, Wandsworth Council has proposed various planning obligations and conditions in response to the issues raised. Having had regard to these, GLA officers are satisfied that the statutory and non-statutory responses to the public consultation process do not raise any material planning issues of strategic importance that have not already been considered in this report, or consultation stage report GLA/2694f/01.

Draft Section 106 agreement

31 The Section 106 agreement has been updated to include the following provisions in addition to the clauses originally secured as part of the extant planning permissions:

- **Affordable housing**

- Delivery of 47% affordable housing on the 'uplift' (i.e. 32 additional units) equating to a **total of 136 units** (18.8% by habitable room) delivered across Plots E, F and G at a tenure split of 81/19 (London Affordable Rent/Shared Ownership or 106 London Affordable Rent units and 30 Shared Ownership units).
- Final rent levels and affordability criteria.
- Early and late stage reviews with financial viability review mechanisms.
- Removal of all 'Plot A' references obligations associated with Plot A.
- Amendment to **Cycle Hire Schedule** clause to permit the provision of 1 cycle hire stand outside of the redline boundary (to account for changes to the design of the Linear Park/Plot G).
- Reduction in the number of **car club spaces** from 8 to a maximum of 6 (reflecting the loss of residential floorspace in Plot A).
- **Carbon offset contribution of £80,891** towards achieving the minimum 35% onsite reduction target beyond Part L2A of 2013 Building Regulation (assessment is made only on the 'uplift' of units).
- Owner to meet Council's reasonable **legal costs** associated with the Section 106 Deed in accordance with undertakings agreed between the parties. All fees to be agreed in advance and payment made prior to completion of Section 106;
- Other general changes.

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

32 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

33 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

34 Should the Mayor direct refusal, he would be the principal party at any subsequent appeal hearing or public inquiry. Government Planning Practice Guidance emphasises that parties usually pay their own expenses arising from an appeal.

35 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.

36 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

37 Having regard to the details of the application, the matters set out in the committee report and the Council's draft decision notice there are no sound planning reasons for the Mayor to intervene in this particular case and no basis to direct refusal. It is therefore recommended that the Mayor allow Wandsworth Council to determine the case itself, subject to any action that the Secretary of State may take.

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Nine Elms Parkside, South London Mail Centre

in the London Borough of Wandsworth

planning application no. 2019/2250

Strategic planning application stage 1 referral

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

The proposal

Section 73 application for amendments to planning permission (2017/6762) for comprehensive redevelopment of the site in a series of seven plots with buildings up to 23 storeys to contain up to 1,950 units, 4,100 sqm of flexible retail, community and leisure floorspace, and a new primary school.

Amendments are proposed to the approved plans in relation to the maximum height, footprint, and design of the buildings in Plots A, E, F and G, an increase of 68 residential units, and amendments to the quantum/location of retail, leisure, community uses, parking and servicing.

The applicant

The applicant is **Royal Mail Group Limited**, and the architect is **Allies and Morrison LLP**.

Strategic issues

Principle: The masterplan remains in line with the Vauxhall Nine Elms Battersea Opportunity Area, providing jobs and homes and jobs. The increase in residential floorspace is supported (para's 22-27).

Affordable Housing: The amendments result in an uplift of affordable housing (35% across the uplift of units) which is supported. The application is not eligible to follow the Fast Track Route, as set out in draft London Plan Policy H6 and Mayor's Affordable Housing and Viability SPG and must follow the viability tested route. The applicant must submit a viability assessment to be robustly interrogated by GLA officers to ensure the scheme delivers the maximum quantum and affordability of affordable housing. The tenure of the additional affordable housing must be confirmed and must be secured by a deed of variation to the Section 106 agreement (para's 29-35).

Design and children's play space: The amendments to Plots E, F and G are in broad accordance with the extant permission's design principles and do not raise strategic concerns. The minor increase in the linear park is supported however clarification of under 5's place space is required (para's 36, 41-45).

Transport: The reduction in car parking is welcomed, however further reduction in car parking should be sought. Mitigation measures secured on the extant permission must be retained and varied to reflect the revised scheme (para's 60-66).

Further information is required to regarding **energy** and **water**.

Recommendation

That the London Borough of Wandsworth be advised that while the scheme is broadly acceptable in strategic planning terms, the application does not fully comply with the London Plan, with the reasons and remedies set out in paragraph 71 of this report.

Context

1 On the 17th of June 2019 the Mayor of London received documents from the London Borough of Wandsworth notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor must provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under Categories 1A, 1B and 1C(c) of the Schedule to the Order 2008:

1A: Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats.

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 outside Central London and with a total floorspace of more than 15,0000 square metres.

1C(c): 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 the City of London.

3 Once the London Borough of Wandsworth has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or allow the Council to determine it itself.

4 The environmental information for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended 2018) has been taken into account in the consideration of this case.

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

Site description

6 The site lies within the Vauxhall Nine Elms Battersea Opportunity Area (OA) and is also within the Central Activities Zone (CAZ). The wider site comprises 6.06 hectares of land on the south side of Nine Elms Lane and until recently was occupied by Royal Mail's South London mail centre. Part of the site has undergone site preparation and remediation works and part of the site still contains the former delivery office which has planning consent for meanwhile functions.

7 The site is bounded to the south-west by the "New Covent Garden Market" which provides access to and ancillary parking for the main wholesale fruit and vegetable market. To the south-east, adjacent to the railway are residential developments taking place on the former Christies Auction and Government Dispatch Agency, alongside the existing Metropolitan Police Warehouse building. To the east the site adjoins Ballymore's 'Embassy Gardens' development site, where phased development of a high-density mixed-use scheme is currently under construction.

8 Plots E, F and G, to which this S73 application primarily relates, are situated within the southern part of the site and comprise nine buildings: E1q, E2, E3 and E4 within Plot E. F1, F2 and F3 within Plot F and Plot G which comprises a single building.

9 To the north, the site is bounded by the A3205 Nine Elms Lane, which forms part of the Transport for London Road Network (TLRN). The site lies within 800 metres of the Vauxhall transport interchange, providing mainline rail, Victoria Line Underground services, and a range of bus connections. The nearest bus stop is directly adjacent to the site on Nine Elms Lane. Nine Elms Lane, the Vauxhall Cross gyratory, and all arms of the gyratory form part of the Transport for London Road Network (TLRN). The site has limited access to public transport with a public transport accessibility level (PTAL) ranging from 2 to 3, on a scale of 0 to 6b, where 6b is most accessible. The PTAL is forecast to increase substantially following delivery of the Northern Line Extension (NLE) in 2021, and other accessibility improvements to buses. Proposed NLE tunnels run below the site and TfL has separate infrastructure agreements in place with the applicant.

Details of the Proposal

10 This Section 73 application seeks outline planning permission for several amendments to the consented master planned scheme in respect of Plots A, E, F and G following design development.

Summary of Proposal

11 The proposed amendments are summarised, as follows:

- Removal of the residential (Use Class C3) and ground floor retail and commercial (Use Class A1-A5/D1-D2) floorspace approved on Plot A in lieu of a full drop in application submitted for an Office (Use Class B1) development with ground floor retail uses (Use Class A1-A5/ D1-D2);
- Amendments to the Parameter Plans in relation to the overall maximum height and massing of Block F3 within Plot F and Block E2 within Plot E;
- Amendments to the Parameter Plans in relation to the location of ground floor retail and community uses for Plots E, F and G;
- Amendments to the building footprints of Plot E, F and G;
- Modifications to the height (increase by 5.93m) and massing of Building G resulting from design development and proposed layouts;
- Increase to the quantum of residential floorspace for Plots E, F and G providing for an additional 68 residential units (including 24 affordable housing units) in these plots;
- Decrease to the quantum of parking, servicing, storage and plant for Plots E, F and G;
- Revisions to the Design Codes for Plots E, F and G;
- Increase in the quantum of Linear Park by approximately 83 square metres.

Detailed Description of Proposal

12 Across the wider master planned development, the proposed amendments to the scheme result in the following impacts on floor space provision:

Land use	Approved (sqm GEA)	Proposed (sqm GEA)	Difference (sqm GEA)
Retail / Community / Leisure (A1-A5, D1-D2)	10,100	9,658	-442
Residential	180,507	193180	+12,673
Parking, servicing, plant, storage	28,750	24,072	-4678
Total	219,357	226,910	+7553

Plot A Amendments

13 It is proposed to remove the approved residential and approved retail / community / leisure uses from Plot A. The design code and parameter plans previously approved for this plot are proposed to be removed.

14 It is relevant to note that a planning application seeking full planning permission for a 12-storey Office (Use Class B1) development within Plot A, with ground floor retail uses (Use Class A1-A5/ D1-D2) has been submitted (see GLA ref: 2694e) alongside the section 73 application which is the subject of this report.

Case history

15 Outline planning permission was granted in March 2012 (LPA ref: 2011/2462; GLA ref: 2694) for mixed use redevelopment to provide residential accommodation (of up to 1,870 residential units), commercial floor space, a mail delivery office, school and associated works including landscaping associated with the 'Linear Park'. The scheme secured 15% affordable housing (split 60:40), and £50 million of contributions for the Northern Line Extension (NLE), in accordance with the Vauxhall Nine Elms Battersea Opportunity Area Planning Framework (VNEB OAPF).

16 Subsequently, planning permission was granted in January 2017 for amendments to the approved permission to remove the delivery office from the scheme, re-position the school, amend the linear park layout and increase the number of units by 80 (to 1,950 in total) (LPA ref: 2016/2424; GLA ref: 2694a). The Mayor was consulted on this application and was content for the Council to proceed with granting permission. This was based on the scheme delivering an uplift in affordable housing provision compared to the baseline provision of 15% (27% of the uplift achieved resulting in 17% overall).

17 On the 28th of March 2019, a further amendment (ref: 2017/6764) approved a number of amendments including amendments to maximum heights for Plots B & D, amendments to the location of the B and D ground floor retail uses, amendments to the external appearance of Buildings B1 and D1; Adjustments to the quantum of residential development from the overall permitted areas for Plots B, D, E and F; Adjustments to the quantum of retail, community and leisure uses within Plots B, D and F; Adjustments to the quantum of parking, servicing, storage and plant within Plots B, D, E and F; Inclusion of a loading bay on Moat Street for Plot B and the adjustment in the position of the crossover into Plot D on New Mill Road; and revisions to the Design Codes for Plots B and D.

18 The planning application that is the subject of this report was submitted concurrently with an application for full planning permission for Plot A (LPA ref: 2019/2293, GLA ref: 2694e) for the erection of an eleven-storey building with rooftop terrace comprising 18,581sqm of office floorspace, 184sqm flexible commercial/community floorspace at ground floor, a single-storey basement containing plant and cycle parking, together with associated landscaping.

Strategic planning issues and relevant policies and guidance

19 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 Wandsworth Core Strategy (2016), the Wandsworth Development Management Policies Document (2016), the Site-Specific Allocations Document (2016), and the London Plan 2016 consolidated with alterations since 2011.

20 The following are also relevant material considerations:

- The National Planning Policy Framework and National Planning Practice Guidance;

- The Draft London Plan – Consolidated Changes Version July 2019 which should be taken into account on the basis explained in the NPPF.
- Vauxhall Nine Elms Battersea Opportunity Area Planning Framework (2012) (“VNEB OAPF”);

21 The relevant issues and corresponding policies are as follows:

- Mix of uses *London Plan; draft London Plan; VNEB OAPF; Central Activities Zone SPG,*
- Housing *London Plan; draft London Plan; Housing SPG; Housing Strategy; Shaping Neighbourhoods: Play and Informal Recreation SPG; Shaping Neighbourhoods: Character and Context SPG;*
- Affordable housing *London Plan; draft London Plan; Housing SPG; Housing Strategy; Affordable Housing and Viability SPG;*
- Urban design and heritage *London Plan; draft London Plan; VNEB OAPF; Character and Context SPG; Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG; London World Heritage Sites SPG*
- Inclusive design *London Plan; draft London Plan; Accessible London: Achieving an Inclusive Environment SPG;*
- Sustainable development *London Plan; draft London Plan; Sustainable Design and Construction SPG; Mayor’s Environment Strategy;*
- Transport and parking *London Plan; draft London Plan; Use of planning obligations in the funding of Crossrail, and the Mayoral Community Infrastructure Levy SPG; the Mayor’s Transport Strategy.*

Principle of development

22 The site is located within the Central Activities Zone (CAZ) and within the Vauxhall Nine Elms Battersea Opportunity Area (VNEB OA) which is expected to accommodate significant growth with a minimum of 20,000 new homes and 25,000 new jobs.

23 The redevelopment of the site to provide market and affordable housing is strongly supported in accordance with London Plan Policy 3.3 which seeks to increase London’s supply of housing and Policy H1 of the draft London Plan which seeks to ensure boroughs optimise the potential for housing delivery on underutilised sites.

24 The site has also been designated by the Wandsworth Council in the Site-Specific Allocations Document as Site 18 designation, which has opportunities for new residential accommodation, employment floorspace, schools and nursery and a linear park in a mixed-use development.

25 The current application seeks changes to the amended scheme, resulting in an uplift in redistribution of residential land uses, as well as a minor decrease in retail, community and leisure land uses as well as a decrease in floorspace to be used for parking, servicing, plant and storage.

26 The decrease of the retail, community and leisure floorspace (442sqm) is considered minor in the context of the wider masterplan, which continues to provide 9,658sqm of floorspace for these uses, equating to a 4.4% decrease. This decrease in commercial floorspace does not raise any strategic concerns, nor does the redistribution of commercial units, and the principles of the masterplan remain acceptable and in accordance with the VNEB OA and CAZ policy.

27 The principle of the proposed development continues to be supported in land use terms, as a mixed-use redevelopment of a brownfield site continues to be proposed; providing housing, commercial uses and a new school for the local area. The linear park remains central to the proposals and ground floors remain activated through the proposal. As such, the masterplan remains in line with London Plan and draft London Plan objectives and policies for the CAZ and VNEB Opportunity Area, continuing to contribute towards the ambitious jobs and homes targets.

Housing

28 While it is noted that the 9,972 sqm GEA of residential floor space, and 307 sqm of retail /community and leisure has been removed in its entirety from Plot A, as noted previously, a “drop in” full planning application has been submitted seeking full planning permission for the development of that plot. While this residential use is being removed from Plot A, the scheme would not result in a reduction in residential floorspace nor the quantum of residential units coming forward. The revised scheme results in an overall uplift of residential floorspace by creating an additional 12,673 sqm, (taking the residential cap to 2,018 units) and the applicant has offered 35% of the additional units as additional affordable housing, as outlined in further detail, below.

Affordable housing

29 The level of affordable housing consented across the masterplan is 15% (except for Plot C1 where 25% is to be delivered and Plots B and D where 18% is to be delivered). Reserved matters approval is expected to come forward for the relevant plots, and this will secure the mix and location of the affordable units within the relevant plots. The affordable housing provision of 15% which has been approved via the extant planning permission is to be retained on the approved residential development and the proposals seek to provide 35% affordable housing on the uplift of residential accommodation within Plots E, F and G.

30 As per the extant planning permission, 691 residential units are approved within plots A, E, F and G; including 104 affordable housing units (15%). The scheme seeks physical changes to the outline parameters; resulting in a relocation and redistribution of the residential units from Plot A to Plots E, F and G, and further propose an uplift of 68 residential units (including 24 affordable housing units (35%)) within the revised scheme. Therefore, a total of 759 residential units are now proposed across Plots E, F and G.

31 London Plan Policies 3.11 and 3.12 and draft London Plan Policy H5 ‘Delivering affordable housing’ of the draft London Plan and the Mayor’s Affordable Housing and Viability SPG set a strategic target of 50% affordable housing. Policy H6 of the draft London Plan and the Mayor’s Affordable Housing and Viability SPG set out a ‘threshold approach’ whereby schemes meeting or exceeding a specific threshold of affordable housing (in this case 35%) by habitable room without public subsidy and which meets other criteria are not required to submit viability information to the GLA, nor would the application be subject to a late stage review mechanism. Draft London Plan Policy H7 and the Mayor’s SPG sets out a preferred tenure split of at least 30% low cost rent (as either London Affordable Rent or Social Rent), at least 30% intermediate (including London Living Rent and London Shared ownership), and the remaining 40% to be determined by the local planning authority as low cost rent homes or intermediate products.

32 The previous reiteration of the masterplan scheme (LPA ref: 2017/6762, GLA ref: GLA/2694b) secured an uplift of 35% on-site affordable housing (Discount Market Rent) via an unit uplift in the scheme (which will be subject to early and late stage reviews, and clawback mechanisms), and this amendment (approved 28th March 2019) raised the total quantum of affordable housing provided across the approved masterplan site from 15.1% by unit (16.5% by habitable room) to 18% by unit (20% by habitable room).

33 The current proposals seek to deliver 35% affordable housing on the uplift of residential accommodation, which is welcomed. However, as the original permission did not meet the 35%

Fast Track threshold and as the resulting changes would not result in the scheme meeting this threshold, the application is unable to follow the Fast Track Route, as described in paragraph 2.15 of the Mayor's SPG and draft London Plan Policy H6. Therefore, the application should be considered against the viability tested route. The applicant must submit a viability assessment to be robustly interrogated by GLA officers to ensure the scheme delivers the maximum amount of affordable housing. The applicant must investigate the potential for Mayoral grant funding (and any other available public subsidy) with a view to further increase affordable housing delivery within the scheme.

34 The affordability of the additional units must comply with the requirements of Policy H7 and H13 of the draft London Plan, the Mayor's Affordable Housing and Viability SPG and the London plan Annual Monitoring Report. Further detail is required to confirm that this 35% affordable housing can be secured by habitable room count (not by unit) and to confirm that the proposed tenure and affordability criteria of the residential accommodation meets requirements. While it is assumed that the uplift of affordable housing will be delivered in accordance with the original masterplan's Section 106 (which specifies that Plots E, F and G will deliver an Affordable Housing tenure split of 60% Affordable Rented Units and 40% Intermediate Housing Units), this should be clarified.

35 In accordance with Policies H6 and H13 of the draft London Plan, the delivery of additional affordable housing units must be secured via a deed of variation to the Section 106 agreement. The deed of variation must secure affordability criteria, early and late review mechanisms for the additional affordable housing units to incentivise timely delivery and ensure that the scheme would deliver the maximum level of affordable housing through to the delivery stage. All other affordable housing clauses in the existing s106 agreement must be retained.

Children's play space

36 The proposed amendments to the Design Codes seek to accommodate any under provision of the Plots E, F and G's under 5's play space within the Nine Elms Park. The Design and Access Statement justifies the proposed by stating that *"It is felt that children living in plots E and F will benefit from the many play opportunities within Nine Elms Park; the door stop play requirement does not need to be constrained within the courtyard"*. Further details in respect of this proposal should be provided. Specifically, due to the size of the Nine Elms Park, the proposal presents concerns in respect of the possible distances required for young children to access play space, which should ideally be provided on-site and within no more than 100m from the residential unit. Furthermore, it should be clarified if this change in the approved design codes has resulted from an uplift in the residential accommodation and affordable housing across the site, meaning that the play space requirements cannot be achieved within the site. As there is an uplift in the quantum of the residential accommodation within the scheme, it is expected that an appropriate provision for children's play space is provided to meet the requirements of the Mayor's Providing for Children and Young People's Play and Informal Recreation SPG. Further clarification is required to demonstrate that the revised scheme meets these requirements. As per Policy S4 of the draft London Plan, playspace should not be segregated by tenure.

Residential Quality

37 London Plan Policy 3.5 and Policy D4 of the draft London Plan promotes quality in new housing provision, with further guidance provided in the Housing SPG.

38 As planning permission is in outline, the proposed floor plans for each of the plots are not expected to come forward until reserved matters are submitted at a later stage. As the Mayor is not consulted on these applications, it is important that commitments from the applicant are secured in the design codes and development specification. These were approved via the extant permission, with typical floor plans setting out its commitments with respect to residential quality, private

amenity space core, flat layouts and core arrangements, including frequency of front doors and active frontages.

39 Furthermore, several conditions have been attached to the extant planning permission in respect of residential quality, securing quality in terms of materials, landscaping, boundary treatments, wind mitigation, Residential amenity, residential management, noise insulation and the Distribution and internal configuration of residential units.

40 Given the above, amendments to plan layouts do not present any strategic residential quality concerns, and overall the proposal responds positively to draft London Plan policies in optimising development and delivering good growth. The conditions on the extant planning permission should be retained on the grant of planning permission and amended as required to reflect the revised scheme to ensure a satisfactory level of residential accommodation is provided within the development.

Urban design

41 Good design is central to all objectives of the London Plan. London Plan Policy 7.1 sets out a series of overarching design principles for development in London. The design policies within chapter 7 and elsewhere in the London Plan include specific design requirements relating to maximising the potential of sites, views and public realm. Policy 7.4 also requires that new development has regard to its context and makes a positive contribution to local character. The intent of these policies is reflected in draft London Plan Policies D1 and D2.

42 The consented outline development sets the parameter plans for various components of the development including, among other elements, height, building edges and design codes for each of the plots. The consented outline planning permission includes condition 3, which requires reserved matters detailing to be provided in respect of each phase of the development (except where approved as part of the outline permission). These reserved matters include the scale and external appearance of the buildings and structures, layout of buildings, routes and structures, access to and within the site for vehicles cycles and pedestrians, and the landscaping of private and public space. Thus, while some assessment of the urban design of the scheme has occurred in the assessment of the application, further assessment of urban design will be required via each of the reserved matters submissions that come forward. As the Mayor is not consulted on these applications, it is important that commitments are secured through the design codes and imposition of relevant conditions.

43 The changes to the design code in respect of the changes to the commitments in respect of plant species and design, location of cycle parking within courtyards and the commitment to provide edible fruit tree orchards are justified on the basis that this allows greater flexibility and practicality to the landscape and courtyard design. While this change within these three plots does not raise any strategic issues, subject to compliance with relevant cycle parking and landscaping standards, these changes should be confirmed by the Borough.

44 The changes proposed to the parameters within this application are generally consistent with the principles established in the approved masterplan and raise no strategic design concerns.

45 Using parameter plans and design codes, the proposed development continues to seek to provide a high-quality urban development which contributes positively to the wider VNEB OA development area. It is recommended that the relevant conditions and design codes are secured on any variation to the consented development to ensure the appearance and architectural form of the development is controlled and is of a high quality and co-ordinated design.

Heritage

46 The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the statutory duties for dealing with heritage assets in planning decisions; which should “have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.” In relation to conservation areas, ‘in the exercise of planning powers within a conservation area, the decision maker is required to pay special attention to the desirability of preserving or enhancing the character or appearance of that area’. Furthermore, the Act states that ‘for development which affects a listed building or its setting, the decision maker shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses’.

47 The NPPF states that when considering the impact of the proposal on the significance of a designated heritage asset, great weight should be given to the asset’s conservation; significance can be harm or loss through alteration or destruction of the heritage asset or development within its setting. Policy HC1 of the draft London Plan, like London Plan Policy 7.8, states (in summary) that development should conserve heritage assets and avoid harm.

48 The Site does not include any listed buildings and is not located within a conservation area. There are conservation areas and heritage assets within the wider area, including the Grade II* listed Battersea Power Station, Battersea Park and Parktown Estate Conservation Areas, and to the north of the River Thames: Churchill Gardens, and Pimlico and Dolphin Square Conservation Areas. The Site lies in an area affected by the protected views of the Palace of Westminster World Heritage site.

49 When considering the scheme previously, the scale of development in terms of impact upon strategic views was found to be acceptable and design concerns were addressed through the planning process and prior to the granting of planning permissions. The current proposals will result in a minor change in height and massing to Plots E, F and G.

50 An updated Townscape Visual Impact Assessment has been submitted with the planning application which concludes that there will be no impact on current views of the Palace of Westminster World Heritage Site, and also that the effects on the settings of the heritage assets would be the same as the approved masterplan because the overall appearance and visual effects of the Nine Elms Park Masterplan would remain the same as that of the Approved Masterplan.

51 Having regard to the statutory duty in respect of listed buildings in the Planning (Listed Buildings and Conservation Areas) Act 1990, and the relevant paragraphs in the NPPF in relation to listed buildings and conservation areas, GLA officers are satisfied that the revised scheme would not harm the setting of the nearby listed buildings and conservation areas. The proposal therefore accords with Policy 7.8 of the London Plan and Policy HC1 of the draft London Plan, and London World Heritage Sites SPG.

Inclusive design

52 London Plan Policy 3.8 ‘Housing Choice’ and Policy D5 of the draft London Plan requires that 90% of new housing meets Building Regulation requirement M4(2) ‘accessible and adaptable dwellings’ and 10% meets Building Regulation requirement M4(3) ‘wheelchair user dwellings’, that is, designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users.

53 The extant outline planning permission for the masterplan includes a condition (condition 15, LPA Ref: 2017/6762) that secures not less than 10% of residential units shall be wheelchair accessible or easily adaptable for wheelchair users (Building Regs. M4(3)) with the remaining 90% of residential dwellings meeting Building Regs M4(2). 10% of residential units should be secured across the uplift of residential accommodation as wheelchair units, with relevant conditions, plans and schedules set out in the obligation agreement to be amended to

align with the revised scheme to ensure that this is achieved, and that the wheelchair units are split across tenures and typologies to ensure choice for disabled people.

Sustainability and Energy

54 The wider masterplan approved decentralised heating services around the site, with individual plant rooms accommodating heat substations provided within each plot (and back up boilers within plant rooms should emergency heat be required) that connect to the network centrally as and when each plot is developed.

55 The Vauxhall Nine Elms and Battersea (VNEB) district heating network (DHN) is within the vicinity of the development and the applicant proposed to connect to the network.

56 While it is noted that there are conditions on the extant planning permission requiring both a Low Emission Strategy for each Plot, and a 35% reduction in carbon dioxide emissions below the maximum threshold set in Building Regulations Part L 2013, it is noted that the revised scheme, notably the uplift of residential accommodation, must be assessed against relevant planning policies, and it must be confirmed if the imposed planning conditions can should remain on the grant on any approval of the revised scheme.

57 As such, an updated energy statement/addendum will be required to confirm how the design proposal is meeting the carbon targets and follows the heat hierarchy.

Water

58 The current approved Masterplan integrates the drainage into the wider site landscaping, which is the preferred approach and is broadly in line with both the London Plan and draft new London Plan.

59 The proposed changes to Design Codes remove many of the requirements for the drainage to be integrated into the landscaping and other good practice measures. In most cases the justification for a change states that it will allow an approach that reflects current standards. As currently presented and justified, the changes proposed to clauses E5.7, F5.7, PR1.1, PR2.1, PR2.2, PR2.4 and PR2.5 of the Design Code are not supported. The Applicant should provide a clearer justification as to why the proposed changes are necessary. The justification should also reference to the previously approved Masterplan and detailed drainage strategies and explain what changes are envisaged.

Transport

60 To support the level of growth anticipated in the VNEB OA, transport infrastructure schemes have been identified in a Development Infrastructure Funding Study (DIFS), including the Northern Line Extension (NLE) and area wide upgrades to bus services. As such, it is expected that the PTAL will increase to approximately a score of 5 with the delivery of these schemes. The NLE tunnels run below the site, and TfL has separate infrastructure agreements in place with the applicant.

61 Trip generation methodology is acceptable and confirms that the additional demand generated by the proposed alterations will be mitigated by the existing package of transport improvements to be delivered in the VNEB OA.

62 TfL is working with the applicant and the Council to develop the design for Battersea Park Road and Nine Elms Lane, to provide enhanced cycling provision, improved pedestrian crossing facilities, bus stops and high-quality urban realm. The applicant should continue to engage with

TfL in the design process, with regards to the scheme design on the site frontage and at the junction with Moat Street.

63 The proposals seek to provide approximately 0.28 car parking spaces per residential unit for Plot E, and 0.25 car parking spaces per residential unit for Plot F and G. This is a reduction from the ratio of 0.3 per unit which was approved via the extant planning permission, and this reduction is welcomed. Given the location of the site within the Opportunity Area and the CAZ, a car free development would be strongly supported in accordance with the draft London Plan policy T6; however, as a minimum the applicant should seek to reduce the approved level of car parking in line with the maximum standards set in the OAPF of 0.25 spaces per unit. Car parking for disabled persons and facilities for electric vehicle charging will be provided in line with the London Plan.

64 A Framework Delivery and Servicing Plan has been submitted with the application to reflect the proposed changes, which is welcomed. The Construction Logistics Plan should also be updated accordingly, in line with guidance.

65 Several conditions and obligations are attached to the consented development (ref: 2017/6762) permission relating to car parking, cycle parking, parking management strategy, car park management plan, roads management strategy, electric vehicle car parking provision, cycle hire schemes, school pick up and drop off areas, servicing and delivery management plan, car club obligations, exclusion from Controlled Parking Zones, cycle hire safeguarding, Legible London Signage Contribution, Green Travel Modes, TfL Highway Land Works and provision of a travel plan for each plot.

66 The mitigation measures secured in the Section 106 agreement and planning permission for the consented scheme will need to be varied to reflect the section 73 application and TfL will need to be closely involved in the process of drafting amendments to the s106, as well as on any other agreements relating to the NLE. A further charge towards Mayoral CIL will also apply to the additional floor space proposed as part of the amendments.

Local planning authority's position

67 The planning statement sets out that the Wandsworth Council officers have been engaged in pre-application discussion with the developer since March 2018, alongside workshops and reviews carried out by urban design officers and Wandsworth Design Review Panel.

68 While Wandsworth Council officers are still undergoing assessment of the application, it is understood that officers are generally comfortable with the principles of the development and are targeting a Planning Committee in August or September to determine this application.

Legal considerations

69 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

70 There are no financial considerations at this stage.

Conclusion

71 London Plan policies on opportunity areas, housing, affordable housing, heritage, urban design, inclusive design, energy and transport are relevant to this application. In general, the application broadly complies with the relevant policies, however further information and/or confirmation as detailed below for the scheme to fully accord with the London Plan:

- **Principle of use:** The masterplan remains in line with the Vauxhall Nine Elms Battersea Opportunity Area, providing jobs and homes and jobs. The increase in residential floorspace is supported.
- **Affordable housing:** The amendments result in an uplift of affordable housing (35% across the uplift of units) which is supported. The application is not eligible to follow the Fast Track Route, as set out in draft London Plan Policy H6 and Mayor's Affordable Housing and Viability SPG and must follow the viability tested route. The applicant must submit a viability assessment to be robustly interrogated by GLA officers to ensure the scheme delivers the maximum quantum and affordability of affordable housing. The tenure of the additional affordable housing must be confirmed and must be secured by a deed of variation to the Section 106 agreement.
- **Design and children's play space:** The amendments to Plots E, F and G are in broad accordance with the extant permission's design principles and do not raise strategic concerns. The minor increase in the linear park is supported however clarification of under 5's place space is required.
- **Climate change and Water:** A revised energy strategy is required to be submitted. The changes to water management in the Design Codes for Plots E, F and G have not been sufficiently justified. Further clarification is required.
- **Transport:** The reduction in car parking is welcomed, however further reduction in car parking should be sought. Mitigation measures secured on the extant permission must be retained and varied to reflect the revised scheme (para's 60-66).

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