

# 10 Trinity Square

in the City of London

planning application no. 11/00317/FULMAJ

**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**

Change of use from office use to provide 121 hotel rooms, 37 private residential apartments and ancillary facilities. Replacement of Seething Lane Garden with an increased area of public open space together with the construction of two pavilions to provide access to basement levels; and other works incidental to the proposals.

**The applicant**

The applicant is **KOP Properties**, and the architect is **Woods Bagot**.

**Strategic issues**

The principle of the conversion and restoration of the **Grade II\*listed** building for a **luxury hotel and private residential uses** within the **Central Activities Zone** has been established by the extant consent. The impact on the setting of **Tower of London World Heritage Site** and its **outstanding universal value** requires further attention.

The **views management** implications are acceptable, but some further information is requested.

Further information is required in relation to the proposed level of **affordable housing**.

The **transport** and **climate change** elements are broadly compliant with London Plan policy, subject to the provision of further information.

**Recommendation**

That the City of London Corporation be advised that the application does not comply with the London Plan, for the reasons set out in paragraph 61 of this report; but that the possible remedies set out in paragraph 62 of this report could address these deficiencies. The application does not need to be referred back to the Mayor if the City of London Corporation resolves to refuse permission, but it must be referred back if the City of London Corporation resolves to grant permission.

## Context

1 On 17 June 2011 the Mayor of London received documents from the City of London Corporation notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor has until 28 July 2011 to provide the Corporation with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under Category 3E of the Schedule to the Order 2008: *"Development — (a) which does not accord with one or more provisions of the development plan in force in the area in which the application site is situated; and (b) comprises or includes the provision of more than 2,500 square metres of floorspace for a use falling within any of the following classes in the Use Classes Order — (ix) class C1 (hotels)."*

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

4 The Mayor of London's statement on this case will be made available on the GLA website [www.london.gov.uk](http://www.london.gov.uk).

## Site description

5 The site is 0.3 hectares and contains the former Port of London Authority building. The site is bound by Trinity Square to the south east, Pepys Street to the north, Seething Lane to the west and Muscovy Street to the south. It is located to the northwest of the Tower of London World Heritage Site and is also within the Trinity Square Conservation Area.

Figure 1: The proposed development site (Source: Woods Bagot Architects)



6 The former Port of London Authority Building at 10 Trinity Square is Grade II\* listed and there are a number of other listed buildings within the locality of the site. The surrounding area is a mixture of mainly commercial and leisure uses.

Figure 2: Location of proposed development site (Source: Woods Bagot)



7 The site is located on Trinity Square a short distance from Tower Hill where the A100 Tower Bridge Road, Minories and the A1203 meet. Tower Hill, A100, and A1203 are part of the Transport for London Road Network. The site has a public transport accessibility level of 6 on a scale of 1 to 6 where 6 is most accessible. Tower Hill London underground station, Tower Gateway DLR Station and Fenchurch Street National Rail station are all in close proximity to the site and provide access to a range of rail services. In addition a total of 7 bus routes serve the surrounding area.

## Details of the proposal

8 The proposed development is to convert the former Port of London Authority building into a luxury 121-room hotel and 37 residential apartments. The existing 1970s addition to the building in the courtyard will be demolished and replaced with:

- A centrally located basement ballroom.
- A glazed central rotunda protected by a glazed dome.
- A glazed conical skin that will radiate up and outwards from the central dome and will provide natural light for the new hotel rooms around the perimeter of the central space.
- A gently sloping metal roof positioned above the existing slate mansard to the side and rear elevations beneath which there will be two set back residential floors.

9 Two pavilion buildings are also proposed to house servicing/vehicle lifts on Seething Lane Garden.

Figure 3: Proposed south-western elevation (Source: Woods Bagot Architects)



## Case history

10 The Mayor was consulted on a substantially similar proposal in March 2009 (PDU reference 2393):

*“Change of use from office use to provide 121 hotel rooms, 30 private residential apartments and ancillary facilities. Replacement of Seething Lane Garden with an increased area of public open space together with the construction of two pavilions to provide access to basement levels; and other works incidental to the proposals.”*

11 In the stage I report for this previous application, issues were raised in relation to views, access and equal opportunities, provision of affordable housing, climate change and transport. At stage II further information was provided to address these issues and the Mayor was content to allow the City of London Corporation to grant planning permission. Planning permission and listed building consents were then granted in March 2010 (local planning references 08/01095 and 08/01098).

## Strategic planning issues and relevant policies and guidance

12 As this application is substantially similar to the previous consented application for this site, this report will deal only with those issues of strategic importance which differ from the consented scheme, particularly where the policy position has changed as a result of the formal publication of the replacement London Plan on 22 July 2011. The relevant issues and corresponding policies are therefore as follows:

- Historic Environment *London Plan; PPS5; Circular on the Protection of World Heritage Sites (07/2009).*
- Views *London Plan*
- Housing *London Plan; PPS3; Housing SPG; Providing for Children and Young People's Play and Informal Recreation SPG*

- Climate change *London Plan; PPS1, PPS Planning and Climate Change Supplement to PPS1; PPS3; PPG13; PPS22; the Mayor's Energy Strategy; Sustainable Design and Construction SPG*
- Transport/parking *London Plan; the Mayor's Transport Strategy; PPG13*

13 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 2002 City of London Unitary Development Plan and the London Plan (2011).

14 The Core Strategy, which has been through an Examination in Public and is due to be adopted in September 2011, is also a material consideration. The site is also located within the City Fringe Opportunity area and the draft City Fringe Opportunity Area Planning Framework is also a material consideration.

## **Principle of development**

15 The principle of the conversion and restoration of the 10 Trinity Square building for hotel and residential uses in the Central Activities Zone is supported by London Plan policies 2.12 'Central Activities Zone – strategic priorities' and 4.5 'London's visitor infrastructure'.

16 In addition, the preservation and sensitive conversion of the Grade II\* listed building within the wider context of the Tower of London World Heritage Site was previously accepted as being in line with London Plan policies relating to heritage. However, given the change in national and strategic policy position since the previous application, the applicant will need to demonstrate that all of the requirements relating to the impact on the setting of the World Heritage Site have been duly considered, particularly in relation to the impact on the outstanding universal value of the Tower of London.

## **Historic environment**

17 The former Port of London Authority building is Grade II\* listed building within the Tower Conservation Area. Since the previous planning application was submitted and consented, the policy approach to assessing impact of developments on World Heritage Sites has evolved. In July 2009 the Government published a Circular on the Protection of World Heritage Sites (07/2009). The Circular establishes the Government's objective to protect each World Heritage Site through conservation and preservation of its outstanding universal value. It sets out that World Heritage Sites and their settings, including any buffer zone should be protected from inappropriate development.

18 The Circular identifies the setting of a World Heritage Site as the area around it (including any buffer zone) in which change or development is capable of having an adverse impact on the World Heritage Site, including an impact on views to or from the site.

19 PPS5, Planning for the Historic Environment, published in 2010, includes World Heritage Sites in the definition of Designated Heritage Assets. Policy HE10, which deals with applications for development affecting the setting of a designated heritage asset states that authorities should treat favourably applications that preserve those elements of the setting that make a positive contribution to or better reveal the significance of the asset. When considering applications that do not do this, local planning authorities should weigh any such harm against the wider benefits of the application. The greater the negative impact on the significance of the heritage asset, the greater the benefits that will be needed to justify approval.



20 The London Plan (2011) also has a number of new and enhanced policies in relation to World Heritage Sites. Particularly 7.10 'World Heritage Sites' which states that *"Development should not cause adverse impacts on World Heritage Sites or their settings (including any buffer zone). In particular, it should not compromise a viewer's ability to appreciate its Outstanding Universal Value, integrity, authenticity or significance. In considering planning applications, appropriate weight should be given to implementing the provisions of the World Heritage Site Management Plans"*. Policy 7.11 'London View Management Framework' also stresses the need to identify and protect aspects of views that contribute to a viewer's ability to recognise and to appreciate a World Heritage Site's authenticity, integrity, significance and Outstanding Universal Value.

21 The development would be viewed in the context of the setting of the World Heritage Site and the applicant should therefore submit a further assessment explicitly assessing the impact of the development on the World Heritage Site in relation to its outstanding universal value to ensure compliance with London Plan policies 7.10 and 7.11.

## Views

22 London Plan policy 7.11 sets out the approach taken towards view management plans and the assessment of development impacts on designated views and states that states that *"The Mayor will also identify and protect aspects of views that contribute to a viewer's ability to recognise and to appreciate a World Heritage Site's authenticity, integrity, significance and Outstanding Universal Value"*. Accurate visual representations have been provided from assessment points 25.A.2, 11B.1 and 11B.2 (as identified in the London View Management Framework) to provide reassurance on the impact of the proposals on the Tower of London World Heritage Site. These conclude that the proposal would result in a minor, beneficial contribution to the view from assessment point 25.A.B at the top of The Scoop, that the proposal would be completely obscured in views from the centre of London Bridge (assessment point 11B.1) and that from the south end of London Bridge (assessment point 11B.2) the proposals would be visible but have a negligible impact on the views.

23 It was previously noted that the proposal is not expected to have a detrimental impact on the setting of the Tower of London World Heritage Site, or the composition of the townscape views in the London View Management Framework. In addition, the Historic and Royal Palaces previously confirmed that they are reassured as to the effect of the proposed development within the local setting of the Tower of London. However, given the change in policy position relating to the setting of the World Heritage Site and the proposals to remove trees from the middle ground of the view, further consideration will be required of the impact that the extension of the Port of London Authority Building will have on the views and the outstanding universal impact.

24 The applicant should therefore reiterate the impact of the development on the views to ensure compliance with London Plan policy 7.11 and also provide confirmation that the Historic and Royal Palaces remain content with the impact of the proposals on the outstanding universal value of the world heritage site.

## Housing

25 London Plan policy 3.3 seeks to increase London's supply of housing and sets a London-wide target of 32,210 additional homes per year until 2015/2016 when this target will be reviewed. Table 3.1 sets borough housing targets, of which the City of London Corporation's is 110 additional homes per year between 2011 and 2021. Policy 3.4 of the London Plan seeks to ensure that development proposals achieve the optimum intensity of use taking into account local

context, the design principles of the London Plan and public transport capacity. This marks a departure from the previous approach of 'maximising' density to optimising site capacity.

26 London Plan Policy 3.12 requires borough councils to seek the maximum reasonable amount of affordable housing when negotiating on individual private residential and mix-use schemes. In doing so, each council should have regard to its own overall target for the amount of affordable housing provision. Policy 3.11 states that affordable housing targets should be based on an assessment of regional and local housing need and a realistic assessment of supply, and should seek an average housing provision of at least 13,200 more affordable homes per year in London, with priority accorded to the provision of affordable housing.

27 Where borough councils have not yet set overall targets as required by Policy 3.11, they should have regard to the overall London Plan targets. It may be appropriate to consider emerging policies, but the weight that can be attached to these will depend on the extent to which they have been consulted on or tested by public examination. The City of London Corporation recognises the 50% affordable housing target in its soon to be adopted Core Strategy, but does not set a specific target.

28 The proposals are for 37 high quality private residential apartments, some of which are very large. It was agreed as part of the previous application that the applicant would provide a financial contribution towards off-site affordable housing as part of the section 106 agreement and that this will be equivalent to 100% provision. The following justification was previously provided by the applicant:

- The listed nature of the building does not lend itself to alterations and sub-divisions required to meet the requirements of most affordable housing providers. In addition the Grade II listed nature of the building would generate unaffordable service charges for the residents.
- Even affordable units in this location are likely to exceed the usual values for affordable housing and result in subsequent high rental levels.
- Providing affordable housing on-site would undermine the commercial viability of the proposal and potentially reduce the value of the high-end residential units which are required to be sold up-front to fund the remainder of the scheme.

29 This justification for an off-site contribution was previously accepted and the legal agreement for the extant consent detailed that a cash-in-lieu commuted payment of £4,547,520 would be provided to meet the affordable housing requirements of the scheme. The legal agreement also stipulated that the commercial element of the proposal would generate a contribution towards affordable housing, with the total contribution generated by both the commercial element and the residential element of the scheme set at £4,554,373. These amounts were accepted following detailed appraisals of the submitted viability information which determined that this was the maximum reasonable amount of affordable housing that could be offered.

30 However, it is understood that the applicant is now seeking to provide a reduced figure although no formal information has been provided to explain the proposed approach to meeting the affordable housing requirements related to the current planning permission. Detailed viability information will be required and may need to be independently audited. The applicant should be aware that any proposed drop in the level of commuted sum is unlikely to be acceptable given the scale and high-end nature of the proposed development, which is considered to be financially robust enough to weather current economic challenges.

31 Under the previous legal agreement, the applicant was required to pay its total contribution on or before the implementation of the planning permission. The City was then required to spend it on affordable housing provision within a defined area. In terms of how an off-site arrangement should function in practice, the Supplementary Planning Guidance (SPG) to London Plan on housing seeks to ensure that commuted sums go to identify projects to ensure delivery prior to the completion of the on-site market housing. In relation to the extant permission, no location was agreed for the purposes of the off-site arrangement. The applicant had identified a possible site at the Middlesex Street Estate, however, it was uncertain whether the money would be needed to enable development on this site, part of which was tied to a commuted sum from a separate application.

32 The location, although narrowed to a broad area and with a potential option, and timing of any delivery had not been secured through the legal agreement associated with the extant permission and this should be addressed in the current scheme.

33 Further information should be supplied on the proposed approach to addressing affordable housing matters before the application is referred back to the Mayor to ensure compliance with London Plan policy 3.12.

## **Climate change**

34 London Plan policies 5.1 to 5.9 require development proposals to minimise carbon dioxide emissions in accordance with the energy hierarchy, demonstrate that sustainable design and construction standards have been employed, along with the use of decentralised energy networks, renewable and innovative energy approaches.

### **BE LEAN**

#### Energy efficiency standards

35 A range of passive design features and demand reduction measures are proposed to reduce the carbon emissions of the proposed development. Both air permeability and heat loss parameters will be improved beyond the minimum backstop values required by building regulations. Other features include mechanical ventilation with heat recovery and energy efficient lighting.

36 Based on the information provided, it is unclear if the proposed development will achieve any carbon savings from energy efficiency alone compared to a 2010 Building Regulations compliant development.

37 Based on the results of 2010 Building Regulations compliance software modelling, the applicant should confirm that the development will exceed 2010 Building Regulations compliance through energy efficiency alone.

### **BE CLEAN**

#### District heating

38 The applicant should investigate whether there are existing or proposed networks within the vicinity of the proposed development and should provide information on the potential to connect. If no networks are available the applicant should provide a commitment that the development will be designed to be able to connect to a network should one become available in future.



39 The applicant should confirm the location and size of the energy centre that will accommodate the main items of plant. Information should also be provided on how the residential units will be heated.

#### Combined Heat and Power

40 A 228 kWe, conventional gas fired CHP is proposed to be installed to satisfy the requirements of the base building heat load as represented by the domestic hot water system and the spa pool heating system. The applicant should provide heat profiles to support the CHP sizing.

41 A reduction in CO<sub>2</sub> emissions of 482 tonnes per annum (22%) is envisaged through this second part of the energy hierarchy.

#### Cooling

42 The use of packaged air cooled chillers for space cooling is proposed, which would incorporate free cooling features. The applicant should confirm the passive measures that will be adopted to minimise overheating.

#### BE GREEN

##### Renewable energy technologies

43 The applicant has confirmed that there will be no renewables contribution as photovoltaic (PV) panels are not a suitable technology for this location, as due to the heritage nature of the building and shading issues and the only available space is a very small amount of 34 sq.m. on the building's tower. This would only contribute a 0.08% carbon dioxide reduction and is not likely to be appropriate given the Grade II\* listed nature of the building. The absence of any renewables is accepted in this instance.

#### OVERVIEW

44 Taking into account the comments above, the applicant should provide an estimate of the overall reduction in regulated carbon dioxide emissions, expressed in tonnes of CO<sub>2</sub> per annum and percentages, relative to a 2010 Building Regulations compliant.

45 The applicant has provided further information to confirm that the baseline emissions are 2,233 tonnes CO<sub>2</sub> per annum; the energy efficiency measures proposed will reduce carbon dioxide emissions by 6%. The development will be built to be able to connect into future district heating networks, utilising a gas-fired fuel cell CHP will reduce the baseline by a further 32%.

46 The following conditions were applied to the extant permission to secure the energy strategy and these should be modified and attached to the current permission:

#### Definitions

*"10 Trinity Square Heat Network": The heating network associated with the 10 Trinity Square Energy Centre connecting all dwellings and the hotel in the 10 Trinity Square development.*

*"10 Trinity Square Energy Centre": The energy centre within the Development supplying all the heat and hot water requirements through a combined heat and power (CHP) plant of at least 170 kilowatts electrical capacity for the 10 Trinity Square Heat Network including space heating and domestic hot water requirements*

#### Conditions

*Prior to Occupation of the hotel within the 10 Trinity Square development the 10 Trinity Square Energy Centre shall be installed and operational and shall thereafter serve all the heat and hot water requirements for the 10 Trinity Square development including space heating and domestic hot water requirements using the 10 Trinity Square Heat Network.*

*Upon the occupation of the hotel on the 10 Trinity Square development, the 10 Trinity Square Energy Centre should contain combined heat and power (CHP) plant of at least 170 kilowatts electrical capacity.*

### Sustainable design and construction

47 London Plan policies 5.9 to 5.16 require the submission of an energy demand assessment along with the adoption of sustainable design and construction, demonstration of how heating and cooling systems have been selected in accordance with the hierarchy and how the development will minimise carbon dioxide emissions, maximise energy efficiencies, prioritise decentralised energy supply, and incorporate renewable energy technologies. The applicant has demonstrated how these requirements will be met within the heritage constraints of the proposal. In relation to the use of green roofs, to comply with London Plan policy 5.10 'URBAN GREENING', although it is not possible for a green roof to be incorporated on the actual structure of the hotel, every endeavour should be made to incorporate an element of greening on the pavilion roofs or walls as set out in the previous consent.

48 In conclusion, some further clarification on the proposed energy strategy is required to ensure compliance with London Plan policies 5.2 and 5.5. The proposals are broadly compliant with London Plan policies 5.9 to 5.15 relating to sustainable design and construction but further information should be provided to ensure compliance with London Plan policy 5.10.

### **Transport/parking**

49 Thirty basement car parking spaces are proposed to support this development. This represents a reduction of 10 spaces from that previously permitted which is welcomed given the high level of public transport accessibility and the congested nature of the highway network. The applicant has provided clarification as to how the spaces will be allocated to the respective uses, including disabled users, which is also welcomed. In order to ensure that vehicular trip generation is minimised, occupiers of the new residential units should be prevented, through the section 106 agreement, from obtaining on street parking permits.

50 In order to comply with London Plan policy 6.13 'Parking', the developer should ensure that 1 in 5 spaces (both active and passive) provide an electric vehicle charging point. This should also be secured by condition. The development should also provide for one coach parking space per 50 rooms.

51 Trip generation for this site has been calculated using the TRAVL database. Both the methodology used and the sites selected appear to be satisfactory as comparable. Transport for London (TfL) therefore agrees that the impact on the transport for London road network is likely to be minimal. Similarly, TfL has considered the impact of the proposals on the bus network. Given the scale and nature of the development and the high number of bus services available in close proximity to the site, the impact on the network would not require any mitigation.

52 Section 4.8.3 of the transport assessment states that 'major pedestrian activity is expected to be between the site and Tower Hill LUL station and the nearby bus stops'. TfL notes that there is an absence of formal crossing facilities to link the site with local transport infrastructure. The location of the development, adjacent to a busy interchange along with the major tourist

attractions of Tower Bridge and the Tower of London make this a key site for pedestrian improvements. In 2009, TfL undertook a study that identified improvements to interchange and pedestrian facilities, including urban realm, in this area. In line with the previously approved scheme for this and other nearby developments, TfL expects that the developer will make a comparable contribution towards pedestrian, cycling and access improvements that were identified. TfL also requests £50,000 towards the Legible London scheme to improving wayfinding in the surrounding area and encourage walking in accordance with London Plan policy 6.10 'Walking'

53 Whilst TfL welcomes the provision of 80 cycle spaces in the basement, the applicant should confirm that this level will meet the minimum cycle parking standards in the draft replacement London Plan. In order to facilitate the expansion of the Mayor's Central London cycle hire scheme, TfL requests a contribution of £50,000. Further discussion about this matter is welcomed.

54 The transport assessment predicts that 30% of all hotel guest trips would be by taxi and in the two busiest hours of the morning peak, the number of taxi trips would be approximately 75. This is considered sufficient to place additional demand on existing taxi facilities in the vicinity of the site. There are currently two taxi ranks on Trinity Square. The rank that currently serves the Grange Hotel is under the jurisdiction of the City whereas the other taxi rank in Trinity Square, close to Tower Hill Station is TfL appointed and has space for 2 taxis. In accordance with the London Plan (parking addendum to chapter 6), the transport assessment should assess the adequacy of current facilities and if necessary the development should provide a dedicated rank and pick up/drop off points.

55 The commitment to provide a service management plan is welcomed. However, a delivery and service plan (DSP), as referred to in London Plan policy 6.3 'Assessing effects of development on transport capacity' should be submitted for approval by the Corporation in consultation with TfL. The DSP should be secured by planning condition or section 106 agreement. It should identify efficiency and sustainability measures to be undertaken once the development is operational in order to minimise the impact of service vehicle trips on the TLRN. TfL requests that a Construction Logistics Plan (CLP) is secured in accordance with London Plan policy 6.3. As with the DSP, the CLP should identify efficiency and sustainability measures to be undertaken while the scheme is being built.

56 TfL has reviewed the submitted travel plan in accordance with the ATTrBuTE assessment tool. A copy of the ATTrBuTE assessment has been supplied to the applicant for their attention. The content of the travel plan can be significantly improved if more information is provided on how it will be secured and funded.

57 Some further information is required to ensure compliance with London Plan policies 6.3, 6.10 and 6.13.

## **Local planning authority's position**

58 The City of London Corporation is currently considering the application, but is known to have some concerns relating to the proposed loss of affordable housing compared with the extant permission.

## **Legal considerations**

59 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Corporation 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 Corporation under Article 6 of the Order to refuse the application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

## Financial considerations

60 There are no financial considerations at this stage.

## Conclusion

61 London Plan policies on historic environment, views, housing, climate change mitigation and adaptation and transport are relevant to this application. The application complies with some of these policies but not with others, for the following reasons:

- **Historic environment:** The proposals do not comply with London Plan policies 7.10, relating to heritage and conservation.
- **Views:** Further information is requested to ensure compliance with London Plan policy 7.11 relating to views management.
- **Housing:** No information has been provided on the approach to affordable housing and this does not comply with London Plan policy 3.12.
- **Climate change mitigation and adaptation:** The energy strategy broadly complies with London Plan policy 5.1 but further information is required to determine compliance with London Plan policies 5.2 and 5.5. The proposals are compliant with London Plan policies 5.9 to 5.15 relating to sustainable design and construction.
- **Transport:** Further information is required to ensure compliance with London Plan policies 6.3, 6.10 and 6.13.

62 On balance, the application does not comply with the London Plan. The following changes might, however, remedy the above-mentioned deficiencies, and could possibly lead to the application becoming compliant with the London Plan:

- **Historic environment:** The applicant should provide a detailed analysis of the impact of the proposal on the setting of the World Heritage Site and whether any impact is made on its Outstanding Universal Character.
- **Views:** The applicant should assess the impact of the development on the setting of the World Heritage Site as part of the views analysis.
- **Housing:** Further detailed information should be supplied on the approach to meeting the affordable housing requirements through the use of a commuted sum. The location of spend for this sum should also be addressed.
- **Climate change mitigation and adaptation:** Further information is required in relation to the energy efficiency measures, potential future connection to a district heating network and the proposed CHP. Information should also be provided on the urban greening elements.
- **Transport:** Further information is required in relation to allocation of car parking spaces, provision for coaches, taxis and improvements to pedestrian and cycling environments. A

travel plan must be prepared and agreed in line with TfL guidance and financial contributions must be discussed with the City and applicant particularly in relation to improvements to pedestrian, public realm and improved interchange facilities in the local area.

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