

Sugar Quay, Lower Thames Street, EC3

in the City of London

planning application no. 12/01104/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

Redevelopment of site comprising a part 9/part 11 storey building containing ground floor commercial space with 165 residential units above.

The applicant

The applicant is **SQ Guernsey Ltd** and the architect is **Foster and Partners**.

Strategic issues

This **residential** development within the **Central Activities Zone** promotes London's **world city** role. The **loss of office** floor space would not prejudice the business function of the City. The **density** is appropriate, with an acceptable **residential quality**, and the scheme would not unduly impact upon any **strategic views**, as defined in the **London View Management Framework**. Further information, including verification of the **affordable housing** offer, is required to ensure that the maximum reasonable amount is being provision. Further work is required in relation to the **detailed design** of the street elevation, and in relation to **transport**, in order to fully comply with the London Plan.

Recommendation

That the City of London Corporation be advised that the scheme is broadly acceptable in strategic policy terms however, the matters set out in paragraph 78 require further consideration and discussion before it can be confirmed that the proposal fully complies with the London Plan.

Context

1 On 26 November 2012 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 is required 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 1C of the Schedule to the Order 2008:

“Development which comprises or includes the erection of a building of one or more of the following descriptions— (a) the building is more than 25 metres high and is adjacent to the River Thames”;

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; take it over for his own determination; or allow the Corporation to determine it itself.

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

Site description

5 This rectangular site is located on the north side of the River Thames, adjacent to Sugar Quay Jetty, midway between London Bridge and Tower Bridge, fronting the Thames riverside walk. The existing Sugar Quay is 7-storeys with a plant level above, with an overall height of 37 metres. It was built for Tate and Lyle in the mid-1970’s, and provides approximately 20,000 sq.m. (GEA) of office accommodation, which is currently largely vacated.

6 The site is bound by Lower Thames Street along its northern frontage (part of the Transport for London Road Network [TLRN]), with Water Lane to the west, and the Grade 1 listed Custom House beyond that. To the east is Three Quays, currently under construction, and beyond that is the enhanced Tower Hill public space and amenities associated with the Tower of London.

7 The site is well served by public transport, with 13 bus routes which stop within walking distance of the proposed development. The nearest train station to the site is Fenchurch Street and Cannon Street, to the east of the site, is also within walking distance. Tower Hill, Monument, Tower Gateway (DLR) and Bank Underground Stations are also within walking distance of the site. Tower Millennium Pier is located to the east of the site, giving access to the Thames Clipper commuter and other leisure river services. Given the range of services in the area, the site registers a public transport accessibility Level (PTAL) score of 6b (out of a range of 1-6b, where 6b is the most accessible).



Fig 1: site location, to west of Tower of London (source: Design and Access Statement)

Details of the proposal

8 The applicant is proposing demolition of the existing office building and construction of a part nine storey, part eleven storey building (plus plant) to contain 165 residential units, and 658 sq.m. of flexible retail/cafe and restaurant/office use. Ancillary residential facilities include a gym and swimming pool, resident's library, lounge and function room.

9 The basement space would contain plant and storage, 42 parking spaces and 202 cycle spaces.

Case history

10 This scheme would be constructed in place of previously approved scheme for a similarly scaled office building, granted planning permission in 2011. This application was referable to the Mayor, and was found to be acceptable, subject to amendments being made to the roof top plant (ref PDU/2662/01).

Strategic planning issues and relevant policies and guidance

11 The relevant issues and corresponding policies are as follows:

- Land use principles *London Plan; the Mayor's Economic Development Strategy; Employment Action Plan; London Office Policy Review 2012*
- Housing – affordable housing *London Plan; Housing SPG; Housing Strategy; draft Revised Housing Strategy;; Providing for Children and Young People's Play and Informal Recreation SPG;*
- Density *London Plan; Housing SPG*
- Heritage, strategic views, design *London Plan, Revised View Management Framework SPG; World Heritage Sites SPG, Circular 07/09*
- Urban design *London Plan;*
- Inclusive design *London Plan; Accessible London: achieving an inclusive environment SPG; Planning and Access for Disabled People: a good practice guide (ODPM)*
- Sustainable development *London Plan; Sustainable Design and Construction SPG; Mayor's Climate Change Adaptation Strategy; Mayor's Climate Change Mitigation and Energy Strategy; Mayor's Water Strategy*
- Transport and parking *London Plan; the Mayor's Transport Strategy;*
- Crossrail *London Plan; Mayoral Community Infrastructure Levy; Crossrail SPG*
- Blue Ribbon Network *London Plan*

12 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the 2011 City of London Core Strategy, the 2002 Unitary Development Plan and the 2011 London Plan.

13 The following are also relevant material considerations:

- The National Planning Policy Framework and Technical Guide to the National Planning Policy Framework;
- The draft City of London Development Management Development Plan Document (Issues and Options Stage);

- The revised Early Minor Alteration to the London Plan.

Principle of development

14 In terms of the loss of existing office floor space (and increased provision that comes about from the extant permission), the London Plan does not prescribe solely office uses in the CAZ. Mixed use developments are generally supported as a means of delivering jobs and housing in such highly accessible locations. This is reflected in the NPPF, where under paragraph 22, it states that "*Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose.*" Policy 2.11 of the London Plan is also noted, whereby proposals to increase office floor space in the CAZ should incorporate a mix of uses, including housing.

15 The applicant notes the modest size of the existing building and potential new office building, representing just over 1% of the overall target for additional office development for the City over a 10 year period. It is acknowledged that the potential of this site in terms of delivering a large office development is limited by height constraints resulting from its location adjacent to the Thames, listed building and World Heritage Site. As such, the scheme does not run contrary to the City of London's Core Strategy policy CS21, which seeks to "refuse new housing where it would prejudice the primary business function of the City and the comprehensive redevelopment of potential large office sites."

16 Furthermore, based on the findings of the London Office Policy Review 2012 carried out on behalf of the GLA, there is an indication that there is sufficient office supply in the pipeline to meet projected needs, based on extant permissions. This is also reflected in the City of London's Annual Monitoring Report 2010/2011, which confirms that the office floor space targets are likely to be achieved based on schemes under construction to date. Whilst the approved scheme would have been factored into these assessments, due to the scale of development, it is not expected that the conversion to residential use would have any strategic impact upon the supply of office space in the CAZ.

17 Furthermore, noting the site's location within the Thames Policy Area, the Core Strategy permits residential and hotel development where it allows clustering of housing along the riverside. Noting the adjoining Three Quays development, which is currently being built out for hotel and residential use, the scheme would comply with these policy requirements.

18 In summary, the residential use of this site does not raise any significant strategic issues in relation to loss of office floor space, future office supply or the financial role of the CAZ, due to its size and position alongside the river. Nor does it establish any undesirable precedent of change of use from core office use to residential. The scheme includes retail provision at ground floor level, which is supported.

Housing

19 The principle of residential development of the site is acceptable - the City's annual monitoring target is 110 units additional homes per year between 2011 and 2021, and the proposal represents over a years worth of the City's supply.

Affordable housing

20 London Plan policy 3.12 requires borough councils to seek the maximum reasonable amount of affordable housing when negotiating on individual private residential and mixed-use schemes. In doing so each council should have regard to its own overall target for the amount of

affordable housing provision. This target should take account of the requirements of London Plan policy 3.11, which include the strategic target that 60% of new affordable housing should be for social rent and 40% for intermediate rent or sale. The City of London Corporation's Core Strategy requires 30% of affordable housing on-site or 60% equivalent affordable housing off-site (aiming to achieve an overall target of 30% affordable housing across all sites). It sets a requirement for 60% social rent and 40% intermediate, including key worker housing.

21 The Mayor has published an early minor alteration to the London Plan to address the introduction of affordable rent, with further guidance set out in a draft Affordable Rent SPG. With regard to tenure split the Mayor's position is that both social rent and affordable rent should be included within the 60%. It is also noted that while the Mayor has set a strategic investment benchmark that across the affordable rent programme as a whole rents should average 65% of market rents, this is an average investment output benchmark for this spending round and not a planning policy target to be applied to negotiations on individual schemes.

22 Paragraph 3.74 of the London Plan notes that *"Affordable housing provision is normally required on site. In exceptional circumstances it may be provided off-site or through a cash in lieu contribution ring fenced and if appropriate 'pooled', to secure efficient delivery of new affordable housing on identified sites elsewhere. These exceptional circumstances include those where having secured an alternative site, it would be possible to:*

- *Secure a higher level of provision*
- *Better address priority needs, especially for family housing*
- *Secure a more balanced community*
- *Better sustain strategically important clusters of economic activities, especially in parts of the CAZ"* (housing swaps/credits)

23 Further guidance on exceptional circumstances where off-site provision may be considered is provided in the Mayor's Housing SPG (paragraphs 4.4.17 to 4.4.20) which has recently been published: <http://www.london.gov.uk/who-runs-london/mayor/publications/planning/housing-supplementary-planning-guidance>.

24 The applicant has confirmed its intention to make a financial contribution in lieu of on-site affordable housing, stating that this would provide significantly more affordable housing than would have been achieved on site, due to the high residential sales values and service charges. In considering the provision of off-site affordable housing, it still needs to be demonstrated that the maximum reasonable amount of affordable housing could be delivered through this scenario, compared to on-site affordable housing. The applicant has used Argus Developer software to test the viability of the scheme but further analysis, including an independent appraisal by the Corporation, is required in order to verify its findings and to demonstrate that the affordable housing contribution that is being offered is reasonable. As advised at pre-application stage, a robust open book appraisal with detailed analysis of a range of affordable housing scenarios and options, having regard to the enhanced value that a 100% private scheme is likely to have and securing relevant mechanisms in the s106 agreement is expected. This analysis would be expected before the application is referred back at Stage 2, to enable review, discussion and negotiation over its findings.

25 In considering an alternative scenario to on-site provision, off-site provision of affordable housing on a donor site or sites should be the first alternative that is considered. In these circumstances the GLA would expect the donor site(s) to have been identified and for the section 106 agreement to secure delivery of the affordable units within a timeframe linked to the delivery of the market units. Given the likely paucity of sites within the City of London, the GLA would consider sites in neighbouring boroughs. For a cash-in-lieu contribution to be acceptable, the

Corporation will need have identified a programme to satisfactorily demonstrate how the payment will be spent. Details of delivery timescales, types of affordable units that would be secured and their location should be forthcoming. Such a contribution must be used to deliver additional affordable rent and shared ownership units, and not to improve existing housing stock. At this stage, it is noted that the GLA's strong preference is for donor sites to be identified rather than a cash in-lieu payment as this provides certainty of actual delivery, the potential to 'kick-start' stalled housing sites and provide economic benefits of construction.

26 It is acknowledged that discussions regarding the affordable housing offer, including a review of the applicant's toolkit appraisal are on-going, and further analysis is required in order to satisfy London Plan policies, the Housing SPG and the Corporation's housing policies. A draft of the section 106 legal agreement will need to be provided to the GLA prior to the Stage 2 referral in order to be clear that the application submission reflects London Plan policy and the Housing SPG, and that there is a transparent programme of affordable housing delivery secured as part of the development.

27 As noted in the London Plan, there are also circumstances where boroughs should consider whether it is appropriate to put in place provisions for re-appraising the viability of schemes prior to implementation, and maximise affordable housing provision. Depending on the phasing and delivery programme, such an approach might be appropriate for this scheme given the length of time that may pass from initial toolkit appraisal to actual build out.

Housing choice

28 This proposal is made up of 23% studio flats, 27% one-bed, 36% two-bed, 7% three-bed, with 7% three and four-bed penthouse units. Whilst it is acknowledged that the absence of any affordable housing being proposed on site, that the unit sizes are likely to be largely market driven, further discussion (including confirmation from the Corporation's housing team) will be appropriate in order to be clear as to what extent the determined mix reflects local needs and the City's housing requirements.

Residential quality

29 The proposal complies with the space standards set out in table 3.3 of the London Plan. The building is arranged in an H-shape layout, with two cores to the development – parallel to the river and Lower Thames Street. In accordance with London Housing Design Guidance, there are no more than eight flats per core, which is welcomed. Care will be required at detailed design stage however, in order to create a sense of ownership and community in these shared spaces, noting there is a series of long corridors that lack natural light and ventilation.

30 It is noted that due to the building arrangement, there would be a relatively high proportion of single-aspect, north-facing residential units. These are limited to studio and one bed units, and it is noted that the architect has incorporated bay windows and outdoor spaces in order to offer east and west street views to the Monument/City and Tower of London and maximise daylight. In light of the constraints of the site, maximisation of views and dual aspect units otherwise, it is accepted that the provision of single aspect, north facing units is difficult to avoid in this instance. In light of the noise levels and poor quality of Lower Thames Street, it is expected that the facade design will need to incorporate specialised mitigation features. Specific conditions would be expected to secure these details.

Density

31 The site has a public transport accessibility level (PTAL) of 6, and is classified as central in character. London Plan Policy 3.4 seeks to optimise the housing potential of sites, having regard

to local context, design principles and public transport accessibility, and in this location, a residential density range of between 650-1,100 habitable rooms per hectare is suggested.

32 The proposed density is 1,177 habitable rooms per hectare, and whilst is slightly above density range of the London Plan, it is only marginally over, and the scale of development is comparable to the existing building and that already approved. On this basis, the proposed density is therefore considered acceptable, reinforced by its high quality design.

Children's play space

33 Given the housing mix, the child yield of the scheme is relatively low, with approximately eight children under the age of five expected. As such, as set out in the Children and Young People's Play Space SPG, there is no expectation that play space be provided. Given the nature of the ground floor landscaped public realm and limited roof space due to plant requirements, it is acknowledged that there is limited opportunity to provide meaningful traditional child play space within the scheme either way. Given the constraints of the site, its form and location, the justification given in this instance could be accepted, subject to confirmation from the Corporation regarding any requirements to improve play space in public parks in the vicinity at the expense of the applicant.

World Heritage Sites and strategic views

34 The proposed development site is located within the setting of the Tower of London World Heritage Site. The Circular on the Protection of World Heritage Sites (07/2009) 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. 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.

35 Since the previous application was considered, there are a number of new and enhanced policies in relation to World Heritage Sites, as set out in the 2011 London Plan, setting out that schemes should compromise a viewer's ability to appreciate its Outstanding Universal Value, integrity, authenticity or significance. In addition, the NPPF states that applications for development affecting the setting of a designated heritage asset 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.

36 The applicant has produced accurate visual representations of the scheme from a variety of viewpoints, in accordance Mayor's London World Heritage Site – Guidance of Settings SPG and London View Management Framework SPG. Having considered the changed architecture, massing and increased height, when compared with the extant application, it has been satisfactorily demonstrated that the scheme would not unduly draw the eye away from the World Heritage Site and would maintain the viewer's ability to recognise and to appreciate the Tower of London's authenticity, integrity, significance and Outstanding Universal Value in accordance with London Plan policies 7.10 and 7.11. Furthermore, the applicant has provided an accurate visualisation from Queens Walk to demonstrate that the development would not have a detrimental impact on this designated London View Management Framework (LVMF)

SPG panoramic view. With regard to the view from Tower Bridge, the development would be largely hidden by Three Quays, and the outline of The Monument would remain unobstructed.

Urban design

37 The scheme has been the subject of pre-application discussions, and as advised to date, the appearance of the building is appropriate and would make a positive contribution to the cityscape and river prospects. The elevations of the building contain a lot of detail, and demonstrates a good use of layering. Given the strategic visibility and importance of the site, the use of good quality materials is paramount. The early choice of polished concrete with mica and bath stone is appropriate, and would provide a high quality finish, details of which should be secured by way of condition.

38 On the river elevation, the proposed active frontage of a restaurant use fronting onto the river walk is supported. The proposal would include a colonnade with a suitable clearance (6.4 metres) and given the south-facing aspect of this elevation, would further enhance the pedestrian environment. This is welcomed.

39 Whilst it is appreciated that northern side of the building, facing Lower Thames Street, is the 'back' of the building and would be used for servicing and other related movement, there remains a concern that the lack of active frontage would further decrease the already poor pedestrian quality of this street. The extant permission included windows facing on to the street, with a colonnade at the corner of Water Lane and Lower Thames Street, providing a wider footpath to Water Lane. As advised at pre-application stage, the proposed building line runs much closer to this junction, and as not all pedestrian traffic would arrive by the river route (given the street's proximity to the nearest Underground Station and as a route to local shops and services), this could be a pinch point. Further discussion about the design approach being taken would be appropriate and to ensure that opportunities to enliven this frontage have been explored to the full. For instance, where possible the residential entrance lobbies, gym and library should maximise views into and out of the building through use of clear glass. More detailed views of this street elevation should also be provided before the application is reported back at Stage 2 to enable further assessment.

Inclusive design

40 The application is accompanied by an access statement, which draws particularly attention to the public realm, noting there are some steep level changes from Water Lane to, and along, the Thames riverside walk. The principal entrance would be from Water Lane, with both step and step free access being provided and the footways, pedestrian crossings and paths within and surrounding the site are accessible. The building is fully integrated, with priority given to pedestrians, and horizontal circulation, automated doors, passenger lifts, accessible WC's, and way-finding have all been indicated.

41 Improvements to the footways and riverside walk which front the site are proposed, including upgrading of existing paving materials and rationalisation of servicing arrangements. Noting the level change across the site of up to 1.5 metres, detailed plans have been provided to show ramp gradients of less than 1:20 from the River Walk to the building. In relation to access to Sugar Quay jetty itself, the scheme again shows a ramp of less than 1:20.

42 The access statement shows typical flat layouts of the wheelchair accessible homes and indicates how each of the 16 points for Lifetime Homes will be met and how the wheelchair adaptable flats meet the key features of wheelchair accessible housing set out in the GLA's Best Practice Guide on wheelchair accessible housing BPG. Seventeen units (10%) would be designed

to be wheelchair adaptable, in line with policy 3.8 of the London Plan. These commitments should be secured by way of condition.

43 In terms of parking provision, the scheme proposes five accessible bays located near to the residential cores. This provision is lower than would normally be expected, given the amount of accessible flats being proposed, but it is acknowledged that the applicant is seeking to strike a balance between maximum parking standards and minimum requirements for blue badge spaces. As such, the parking management plan should include a mechanism to ensure that the supply and demand of the blue badge bays are regularly monitored and provision reviewed, to ensure that provision equates to the demand from disabled residents and visitors and that the bays are effectively enforced. The applicant has confirmed that if demand arises, additional bays of the appropriate size could be converted.

Sustainable development - climate change mitigation

Energy efficiency standards

44 A range of passive design features and demand reduction measures are proposed to reduce the CO₂ 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 energy efficient lighting and mechanical ventilation with mechanical ventilation with heat recovery. The demand for cooling will be minimised through the use of balconies and external shading.

45 The development is estimated to achieve a reduction of 39 tonnes per annum (11%) in regulated CO₂ emissions compared to a 2010 Building Regulations compliant development.

District heating

46 The applicant has carried out an investigation and there are no existing or planned district heating networks within the close enough vicinity of the proposed development to allow direct connection. The nearest (Citigen scheme) is located 1.5km away, which is too far to allow connection at this time. The applicant has however, provided a commitment to ensuring that the development is designed to allow future connection to a district heating network should one become available.

47 The applicant is proposing to install site heat network to serve the whole development served from a single energy centre. A site-wide community heating schematic has been provided.

Combined Heat and Power

48 The applicant is proposing to install a 76 kWth gas fired CHP unit as the lead heat source for the site heat network. The CHP is sized to provide the domestic hot water load, as well as a proportion of the space heating.

49 The applicant states that electricity generated from the CHP will be used to serve the landlord's areas, with an option to export when feasible.

50 A reduction in regulated CO₂ emissions of 54 tonnes per annum (17%) will be achieved through this second part of the energy hierarchy.

Renewable energy technologies

51 The applicant has investigated the feasibility of a range of renewable energy technologies and is proposing to install 100 sq.m. of roof mounted photovoltaic array (PV). A roof drawing showing the PV location has been provided.

52 A reduction in regulated CO₂ emissions of five tonnes per annum (2%) will be achieved through this third element of the energy hierarchy.

53 In summary, a reduction of 98 tonnes of CO₂ per year in regulated emissions compared to a 2010 Building Regulations compliant development is expected, equivalent to an overall saving of 28%. The CO₂ savings exceed the targets set within Policy 5.2 of the London Plan. The applicant has broadly followed the energy hierarchy to reduce carbon dioxide (CO₂) emissions. Sufficient information has been provided to understand the proposals as a whole and no further information is required.

Climate change adaptation

54 The applicant has submitted a sustainability report, which includes relevant BRE and Code for Sustainable Homes and pre-assessments. The applicant states that it is intended that all homes be designed to meet Code for Sustainable Homes Level 4 and BREEAM 'very good' for the retail space. The applicant's statement sets out a number of techniques proposed to reduce energy consumption and cut carbon emission, with a fabric first approach making use of orientation for solar gain and shading. Low energy lighting, energy efficient appliances, low water use sanitary-ware and fittings are proposed. The pool water would be heated by the CHP.

55 Noting the location within Flood Risk Zone 3A, a sustainable urban drainage system is proposed. Of particular note is that green roofs and rain water harvesting are proposed to address surface water management. The drainage strategy involves the majority of surface water discharge to the River Thames, in agreement with Thames Water at the detailed design stage to ensure there is capacity in their system. The provision of green roofs also addresses London Plan policy requirement for urban greening in the CAZ, which is welcomed. The applicant's commitments should be secured by way of condition.

56 In light of the location adjacent to the River Thames, policies 7.26 and 7.27, which relate to the Blue Ribbon Network, are also of relevance. Consideration should be given to using water based transport for freight, particularly during demolition and construction phases. Appropriately worded conditions should be considered as part of any decision.

Transport

Parking

57 The proposal includes 42 parking spaces for the proposed 165 residential units, equating to 0.25 spaces per unit. This complies with the London Plan and City of London policies. However, in light of its central location, proximity to shops and services, and in recognition of the high PTAL, a 'car-free' scheme would be appropriate for this site. This would serve to restrain car trips and ownership in this part of central London, assisting in the reduction of highway congestion and encouraging sustainable transport modes. London Plan policy 6.13 provides specific support for car-free developments in areas of high public transport accessibility. Recognising this, the level of car parking proposed should be reduced significantly.

58 The establishment of car clubs for residents is strongly encouraged. Such measures could be secured through planning condition and would help to achieve the 'car free' status being sought above.

59 Notwithstanding this, as noted previously blue-badge holder parking is being proposed, and is welcomed. It is noted that the disabled spaces are not currently compliant with accessibility standards. This should be reviewed to ensure the designs adhere to the Design for London (DfL) guidance 'Inclusive Mobility' and to comply with equality legislation.

60 The reference to electric vehicle charging points (EVCP) is welcomed, although the level of provision must be clarified. The applicant is reminded that, of any agreed level of parking, the London Plan requires 20% provision to be included, in addition to a further 20% passive provision.

61 The applicant's commitment to providing secure and sheltered cycle parking for residents and visitors, at levels compliant with the London Plan, is welcomed. In terms of the non-residential aspects of the proposed scheme, the provision is also welcomed for staff and customers of any future uses, assumed to be restaurants/cafes.

62 It is noted however, that there is no mention of facilities for cyclists, such as shower, changing or locker facilities for staff. These are required under policy 6.9 Cycling of the London Plan to encourage commuters to cycle to work; the applicant is therefore encouraged to address this in their designs.

Trip Generation and Impact

63 It is noted that the trip rates for the residential aspect of the proposal have been derived from the Bart Square development however; further justification is required to demonstrate that this site is comparable to the proposal and to explain why the rates derived from the three TRICS sites examined were not adopted. Also modal split should be based on **2001** Census data, to compliment the TRICS/TRAVL data. A review of the TRAVL sites with a high PTAL rating in inner London area is also required, to ensure the robustness of the assessment.

64 Despite these concerns, it is accepted that due to the likely low number of additional bus trips forecast to be generated, these can be accommodated by the existing bus network.

65 Following concerns raised at the pre-application meeting, the submitted pedestrian environment review system (PERS) audit is comprehensive and robust. It is noted that the two closest bus stops on Great Tower Street were not included in the audit. An assessment of these bus stops would be welcomed to ascertain their condition and whether they comply with DDA regulations. It is, however, acknowledged that two bus stops at Tower Hill were assessed and scored positively.

66 In terms of highway safety, it is noted that the vehicles will access the site via the junction of Water Lane and Lower Thames Street. There have been a number of collisions at this specific location, particularly involving right turning vehicles from Lower Thames Street into Water Lane hitting pedal cyclists travelling straight ahead on Lower Thames Street westbound. An increase in vehicles making the right turn is likely to increase the risk of further collision and as such, it is recommended that a scheme to improve cyclist safety at this junction be considered. Further discussions with the City would be welcomed on this issue.

67 Although it is not within the red line boundary of the site, the applicant is encouraged to assess the condition of the Sugar Quay jetty and whether this is fit for purpose given the extra amount of pedestrians the development will bring to the river front area.

Travel Plan, Servicing and Construction

68 The submission of a framework travel plan is welcomed. The full travel plan should be secured, funded and monitored as part of the section 106 agreement.

69 A delivery and servicing Plan (DSP) should also be secured by condition, for approval by the local authority and TfL prior to the occupation of the site. The DSP should ensure highway and traffic impact resulting from servicing activities should be kept to the minimum. A construction logistics plan (CLP) should also be submitted for local authority and TfL approval prior to construction works commencing on site. This should be secured by condition. As noted above, consideration should be given to having construction materials delivered via the river, using the existing jetty adjacent to the site, thus reducing highway and traffic impact to the TLRN resulting from construction vehicle activities.

Crossrail SPG

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

71 The approach for collecting contributions towards Crossrail is set out in the Crossrail SPG. It states that contributions should be sought in respect of retail and office development in 'Rest of London' areas which involves a net increase in floorspace of more than 500 sq.m. (Gross External Area – GEA). As the proposed development falls within the central London contributions area, the proposed indicative level of charge is £88 per sq.m. for new retail floorspace.

72 A requirement for a Crossrail contribution from this development will therefore relate to the net additional impact from the new development, taking into account the theoretical charge that would be paid by the existing uses.

73 Notwithstanding the above, the level of contribution required in line with the SPG is likely to be less than that to be recovered through the Community Infrastructure Levy (see below). The section 106 agreement accompanying any planning permission should be worded appropriately in this respect.

Community Infrastructure Levy (CIL)

74 In accordance with London Plan Policy 8.3, Community Infrastructure Levy, the Mayor agreed to commence CIL charging for developments permitted on or after 1 April 2012. It is noted that the proposed development is within the City of London, where the Mayoral charge is £50 per square metre Gross Internal Area (GIA). The levy will raise £300 million towards the delivery of Crossrail. Further details can be found at: <http://www.london.gov.uk/publication/mayoral-community-infrastructure-levy>

Local planning authority's position

75 The City of London Corporation is presently reviewing the viability of the scheme, but is understood to be generally satisfied with the general design approach, scale and proposed uses following pre-application discussions.

Legal considerations

76 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

77 There are no financial considerations at this stage.

Conclusion

78 The application is broadly acceptable in strategic policy terms however, further information and/or clarification as detailed below is required before it can be confirmed that the proposal is in full accordance with the London Plan:

- **Principle of use:** The principle of a residential led scheme in this CAZ location is in accordance with London Plan policies 2.10 and 2.11. The loss of the office accommodation is justified due to its modest size and given the strategic office supply in the pipeline.
- **Housing:** Further discussions, including verification of the applicant's financial appraisal and details regarding the approach being taken in relation to off-site provision are required in order to address London Plan policy 3.12. Confirmation that the mix of units meets the Corporation of London's housing needs is also required.
- **Density:** The density marginally exceeds London Plan guidelines, but is keeping with the scale of the existing development and surrounding area and optimises development on the site in accordance with London Plan policy 3.4.
- **Residential quality:** The quality of the accommodation is acceptable, in line with London Plan policy 3.8 subject to clarification regarding noise and air quality mitigation measures.
- **Heritage and views:** The scheme would not compromise a viewer's ability to appreciate the Outstanding Universal Value, integrity, authenticity or significance of the Tower of London or Tower Bridge, particularly when viewed from the river, in accordance with London Plan policies 7.10 and 7.11 and the London View Management Framework.
- **Design:** The height, scale and architectural approach are welcomed, in accordance with London Plan design policies. This is subject to further discussion and visualisations being provided for the Lower Thames Street elevation.
- **Children's playspace:** Whilst the scheme is not proposing dedicated play space, given the low child yield, this is acceptable.
- **Inclusive design:** The development would be fully accessible, with an appropriate level of wheelchair accessible homes, in accordance with London Plan policies 3.8 and 7.2.

- **Climate change:** The applicant has broadly followed the energy hierarchy to reduce CO₂ emissions. Sufficient information has been provided to understand the proposals as a whole and the carbon savings exceed London Plan standards. Sustainability measures are proposed and should be secured by way of condition, including commitments towards river freight movement.
- **Transport:** Whilst the scheme is unlikely to have unacceptable impact on the local highway network, further information and commitments are required from the applicant in order for the scheme to be in accordance with London Plan transport policies. The applicant should consider making this scheme a 'car free development'. Further attention must also be paid to disabled parking, electric vehicle charging and cycling provision for staff, and improving cycle safety at the adjacent junction. A full Travel Plan, DSP and CLP must be secured by condition. Finally, the applicant is reminded to consider the potential Crossrail contributions for which the development will be liable.

for further information, contact Planning Decisions Unit:

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