### Strategic planning application stage 1 referral (new powers)


### The proposal

Full planning permission for the redevelopment to provide a 37 storey building (maximum building height 127m AOD) and 4 storey pavilion building (maximum building height 20.5m AOD), comprising 284 residential units, 809 sq.m. flexible ground floor retail uses and 413 sq.m. commercial (Use Class B1) use, basement car parking, cycle parking, vehicular access, servicing and plant areas, landscaping and public realm improvements and associated works.

### The applicant

The applicant is Lend Lease Residential (CG) PLC and the architect is Squire & Partners.

### Strategic issues

The proposal raises the following strategic issues: land use; regeneration; housing; play space; urban design; inclusive access; equalities; noise; air quality; climate change mitigation and adaptation; and transport.

### Recommendation

That Southwark Council be advised that the application does not comply with the London Plan, for the reasons set out in paragraph 130 of this report; but that the possible remedies set out in paragraph 132 of this report could address these deficiencies.

### Context

1. On 20 July 2012 the Mayor of London received documents from Southwark Council notifying him of a planning application of potential strategic importance to develop the site as described below for the above uses. Under the provisions of the Town & Country Planning (Mayor of London) Order 2008 the Mayor has until 30 August 2012 to provide the Council with a statement setting out whether he considers 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 of the Schedule of 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 15,000 square metres”.

• 1C “Development which comprises or includes the erection of a building of one or more of the following descriptions…the building is more than 30 metres high and is outside the City of London”.

3 Once the Council has resolved to determine the relevant 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 2011 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 application site covers 0.56 hectares of land to the northwest of the Elephant and Castle southern roundabout. It abuts Elephant & Castle (A3) to the east which is part of the Transport for London Road Network and Pastor Street and Brook Drive to the west.

7 The site is currently occupied by a two storey building containing the former Elephant and Castle Leisure Centre swimming pool. This was closed around fourteen years ago due to the building being structurally unsound. The remainder of the leisure centre to the west remained operational until recently. The site is immediately north of St Mary’s Churchyard, which is designated as Metropolitan Open Land and laid out as a public park, and immediately south of the Metropolitan Tabernacle (listed grade II).

8 Elephant and Castle is one of the most important transport ‘hubs’ in London. It is served by two separate London Underground stations, linked at platform level: one station on London Road serving the Bakerloo Line; the other adjacent to the shopping centre serving the Northern Line. It is also one of the busiest bus interchanges in Europe, served by 28 separate routes. Elephant and Castle National Rail station has frequent Thameslink services (six trains per hour) across central London to King’s Cross St Pancras and beyond. As a result of this high service level, the site has a public transport accessibility level (PTAL) of 6b, on a scale of 1 to 6, where 6 is the highest.

9 Cycle Superhighway (CS) 7 passes close to the west of the site along Churchyard Row and Elliott’s Row and the area is also a hub of local cycle routes, with an accordingly high number of cycle movements. CS6, linking Penge to the City, is currently being designed and is planned to open in 2015, passing to the east side of Elephant & Castle.
Details of the proposal

10 The application seeks full planning permission for redevelopment to provide a 37 storey building (maximum building height 127m AOD) and 4 storey pavilion building (maximum building height 20.5m AOD), comprising 284 residential units, 809 sq.m. flexible ground floor retail and/or financial and professional services and/or restaurant uses (Use Classes A1-A3) and 413 sq.m. commercial (Use Class B1) use, basement car parking, and cycle parking. The application also includes vehicular access from Brook Drive, servicing and plant areas, landscaping and public realm improvements and associated works. The application proposes 46 car parking spaces for all land uses, of which 23 would be blue badge, and 349 cycle parking spaces.

Case history

11 There is no relevant strategic case history. GLA officers attended a pre-application meeting with the applicant on 17 April 2012 and subsequently issued pre-application advice.

Strategic planning issues and relevant policies and guidance

12 The relevant issues and corresponding policies are as follows:

- Land use London Plan
- Regeneration London Plan; the Mayor’s Economic Development Strategy
- Housing & density London Plan; Housing SPG; Interim Housing SPG; draft Housing SPG; draft Affordable Housing SPG; Housing Strategy; draft Revised Housing Strategy; draft Revised Early Minor Alterations to the London Plan
- Children’s playspace London Plan; Shaping Neighbourhoods: Providing for Children and Young People’s Play and Informal Recreation SPG
- Urban design London Plan
- Strategic views London Plan, Revised View Management Framework SPG
- Historic environment London Plan; World Heritage Sites SPG
- Access London Plan; Accessible London: achieving an inclusive environment SPG; Planning and Access for Disabled People: a good practice guide (ODPM)
- Equal opportunities London Plan; Planning for Equality and Diversity in Meeting the spatial needs of London’s diverse communities SPG; Equal Life Chances for All (Mayor’s Equalities Framework); Equalities Act 2010
- 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
- Ambient noise London Plan; the Mayor’s Ambient Noise Strategy
- Air quality London Plan; draft Revised Early Minor Alteration to the London Plan; the Mayor’s Air Quality Strategy
- Transport & parking London Plan; the Mayor’s Transport Strategy; draft Revised Early Minor Alteration to the London Plan

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 Southwark Core Strategy (2011), the ‘saved’ policies of the Southwark Plan (2007) and the London Plan (2011). The following are also relevant material considerations:
14 The Elephant and Castle Supplementary Planning Document (SPD) and Opportunity Area Planning Framework (OAPF) was prepared by Southwark Council, working in partnership with the GLA and TfL. It was adopted by Southwark Council as SPD for the Opportunity Area on 20 March 2012 and endorsed by the Mayor as the OAPF for the Opportunity Area on 28 May 2012. The document sets out area specific policy guidance covering, inter alia, land use, urban design, public realm, transport, community infrastructure and planning obligations.

Land use and regeneration

15 The London Plan identifies that the site lies in the Central Activity Zone (CAZ) (policies 2.10 – 2.12), in Inner London (Policy 2.9), in an Area for Regeneration (Policy 2.15) and in Elephant and Castle town centre (Policy 2.15). The site also lies in the Elephant and Castle Opportunity Area (Policy 2.13). Annex One of the London Plan sets out a minimum guideline for new housing of 4,000 homes and an indicative estimate of employment capacity of 5,000 jobs over the plan period 2011 – 2031. The strategic policy direction for the Elephant and Castle Opportunity Area states that:

“The Area is undergoing major transformation with significant investment in housing and potential for new retail provision integrated with a more efficient and attractive transport interchange. There is scope to create a series of connected public open spaces complemented by environmental and traffic management improvements. Resolution of these and rail related issues are crucial to the successful redevelopment of this southern gateway to central London.”

16 The Southwark Core Strategy and Elephant and Castle SPD and OAPF set out a vision for the Opportunity Area which reflects these figures and expounds the strategic policy direction above.

17 The proposed residential-led mixed use development, incorporating small retail and office units suited to small and medium sized enterprises at the ground level, is consistent with planning policy expectations for this part of the Opportunity Area. Moreover it would contribute towards realising the targets above and further the ongoing regeneration of the Opportunity Area.

18 The Elephant and Castle SPD and OAPF (SPD 7: Sports facilities) identifies that a new leisure centre should be provided to replace the existing leisure centre. The Council has resolved to build a new leisure centre on part of the site of the existing centre and to fund this through a combination of funds from its Capital Programme and proceeds from the disposal of the remainder of the leisure centre site to the applicant.

19 The Council, as landowner, has also taken a view that affordable housing provision in the proposal should be forgone in favour of an equivalent financial contribution being made to the funding of the new leisure centre. The Council agreed to sell the application site to the applicant in June 2011 and this affordable housing position is reflected in the proposal.

20 The Council has considered future requirements for sports and leisure facilities in the area and this has included the findings of a public consultation exercise on the matter. As a result of
the process it has commissioned the design of a new leisure facility on the remainder of the site consisting of a new six lane 25m swimming pool, learner pool, four court sports halls, gym, exercise studios, creche and cafe. The application for the new leisure centre, which is not referable in isolation, has been submitted to the Council (ref: 12/AP/2570) and is expected to be determined concurrently. The Council closed the leisure centre on Tuesday 5 June 2012 and is now expected to commence demolition. The new leisure centre is expected to open during the summer of 2014.

21 London Plan Policy 3.16 seeks the protection and enhancement of social infrastructure to meet the needs of London’s population. London Plan Policy 3.19 states that development proposals that increase or enhance the provision of sports facilities will be supported and that proposals that result in a net loss of sports and recreation facilities should be resisted. London Plan Policy 8.2 sets out strategic priorities for planning obligations. This policy identifies affordable housing and transport as priorities but recognises that in certain circumstances other priorities are acceptable. The Elephant and Castle SPD and OAPF considered the community infrastructure required to support the anticipated growth in the area and establishes the level of payment anticipated for each land use.

22 The proposal is put forward as enabling development for the new leisure centre. In isolation it would redevelop the land occupied by the former leisure centre pool for uses not including any replacement sports or leisure facilities. This would, notwithstanding the longstanding closure of the pool, be contrary to the above policies given the potential for this land to accommodate new sports and leisure facilities against a backdrop of significant population growth in the area.

23 The Council has duly considered future requirements for leisure facilities in the area and the proposed leisure centre would address these. In quantitative terms the application notes that the leisure centre proposal would result in a net increase in floorspace of circa 650 sq.m., excluding the floorspace of the former pool. Including the former pool it would result in a net decrease in floorspace. This should be considered in tandem with the qualitative benefits of the scheme which would deliver a modern sports and leisure facility, including a pool, designed in response to local opinion and future needs. This would represent an enhancement in social infrastructure and sports facilities in the area, as sought by London Plan policies 3.16 and 3.19.

24 In order for the proposal to be accepted as enabling the new leisure centre the funding arising from the proposal will need to be substantiated through a financial viability appraisal. The applicant has duly submitted a financial viability appraisal in support of the proposal. This is currently being independently assessed on behalf of the GLA and this matter cannot be progressed pending conclusion of this review.

25 Thereafter, and subject to the conclusion of this review supporting the proposed approach, the financial contribution to the leisure centre in lieu of affordable housing will need to be secured in the section 106 agreement for the application. The agreement will need to include provisions redirecting this payment to additional affordable housing should the leisure centre not proceed. The contribution towards the funding of the leisure centre arising from the Council’s land receipt will be substantiated through the above review but it will be a matter for the Council to ensure that this is directed to fund the new leisure centre in accordance with its Cabinet decision on the matter.

26 In summary, the proposed land uses are consistent with those anticipated by the London Plan and the Elephant and Castle SPD and OAPF but the enabling role of the proposal needs to be substantiated in order to confirm compliance with London Plan policies 3.16 and 3.19.
Housing

27 The proposal includes 284 residential units comprised of studio, 1, 2, and 3 bed units. This is a welcome contribution to the 4000 new homes sought by the London Plan, Southwark Core Strategy and the Elephant and Castle SPD and OAPF for this area.

Housing tenure

28 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.

29 The Mayor has published a revised early minor alteration to the London Plan which addresses 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% strategic target for social rent set out in London Plan Policy 3.11.

30 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.

31 Southwark Core Strategy Strategic Policy 6 establishes a target for the Elephant and Castle Opportunity Area and Elephant and Castle housing sites of a minimum of 1,400 affordable housing units over the plan period. This target is set out in the Vision for the area. It also requires that a minimum of 35% of new housing is affordable and a minimum of 35% is private. Policy 4.4 of the Southwark UDP (2007) requires that 50% of affordable housing be social rented and 50% intermediate affordable housing. These local targets, which pre-date the introduction of the affordable rent tenure, are intended to redress the tenure imbalance that exists in the area and are duly reflected in the Elephant and Castle SPD and OAPF.

32 The application does not propose any affordable housing provision at present. The applicant has sought to justify this on the basis of the enabling role of the proposal in funding a replacement leisure centre on the adjacent site. This matter is addressed in the ‘Land use and regeneration’ section above.

33 The financial contribution made by the proposal towards the new leisure centre and the consequent inability of the scheme to provide any affordable housing will need to be substantiated through a financial viability appraisal. The applicant has duly submitted a financial viability appraisal in support of the proposal. This is currently being independently assessed on behalf of the GLA and this matter cannot be progressed pending conclusion of this review.

34 In summary the proposal is currently inconsistent with London Plan policies 3.11 and 3.12.

Housing choice

35 London Plan Policy 3.8 and the associated supplementary planning guidance promote housing choice and seek a balanced mix of unit sizes in new developments. The London Housing Strategy and the draft revised London Housing Strategy set out strategic housing requirements and the associated targets.
Policy 3.8 also sets out that the provision of affordable family housing is a strategic priority. The London Housing Strategy sets out strategic housing requirements and Policy 1.1C of the Strategy includes a target for 42% of social rented homes to have three or more bedrooms. The revised London Housing Strategy, currently out for consultation, sets out that 36% of affordable rented homes allocated funding in 2011-15 will have three or more bedrooms.

Southwark Core Strategy Strategic Policy 7 seeks: a maximum of 5% of units as studio flats; a minimum of 60% of units with two or more bedroom; and a minimum of 10% of units with 3 or more bedrooms with directly accessible amenity space.

<table>
<thead>
<tr>
<th>Unit Type</th>
<th>Number of Units</th>
<th>Proportion</th>
</tr>
</thead>
<tbody>
<tr>
<td>Studio</td>
<td>12</td>
<td>4%</td>
</tr>
<tr>
<td>1 bed</td>
<td>109</td>
<td>38%</td>
</tr>
<tr>
<td>2 bed</td>
<td>135</td>
<td>48%</td>
</tr>
<tr>
<td>3 bed</td>
<td>28</td>
<td>10%</td>
</tr>
<tr>
<td>Total</td>
<td>284</td>
<td>100%</td>
</tr>
</tbody>
</table>

Table 1: Proposed unit mix

Table 1 sets out the proposed unit mix ranges for the application. This is appropriate at a strategic level, taking account of the relevant policies and the site circumstances, and approaching compliance with local targets above, being only 2% short of the 60% target for two or more bed units.

The applicant has stated that the proposals would comply with the ‘Lifetime Homes’ and wheelchair adaptable housing requirements of Policy 3.8 and submitted plans in support of this. The applicant has committed that where units are sold to someone requiring a wheelchair adapted unit it will finance the fit out of that unit in accordance with specific adaption requirements. This is welcomed. The Council should make a condition of planning consent the submission of plans showing all wheelchair units in their adapted and un-adapted state, details of the proposed marketing of these units, an assessment of demand for wheelchair adapted units, and details of how many were adapted on implementation. This is necessary to ensure that those requiring such units are made aware of this provision and that a suitable number are adapted on implementation to meet this need. This should be monitored by the Council over the lifetime of any permission.

In summary, subject to appropriate conditions being attached to any planning consent, the proposal is consistent with London Plan Policy 3.8.

Housing quality

London Plan Policy 3.5 promotes quality in new housing provision and sets out minimum space standards at Table 3.3. The Mayor has published a draft Housing SPG on the implementation of Policy 3.5 for all housing tenures, drawing on his London Housing Design Guide. The applicant has indicated that all the proposed housing will be consistent with the minimum space standards in Table 3.3 and the baseline standards in the Mayor’s draft Housing SPG. This is supported in the design documentation submitted for approval which shows that many units would exceed the relevant space standards and that the proposal achieves a high standard of residential design. The proposal is consistent with London Plan Policy 3.5.
Housing density

London Plan Policy 3.4 requires development to optimise housing output for different locations taking into account local context and character, the design principles in Chapter 7 and public transport capacity. Table 3.2 provides net residential density ranges in support of this. The Public Transport Accessibility Level (PTAL) of the site ranges between 6b and 5 on a scale where 6 is high and 1 is low. The site lies in a ‘Central’ setting, as defined by the London Plan. Table 3.2 sets out a range of 650 – 1,100 habitable rooms per hectare (hr/ha) which, depending on the number of habitable rooms per dwelling equates to a range of 215-405 units per hectare.

The application proposes 284 residential dwellings (747 habitable rooms) on 0.56 ha site. The application also proposes 1,222 sq.m. of non-residential floorspace which together with parking and servicing space accounts for around 11.5% of the proposed floorspace. Taking account of this gives a net site area of 0.5 ha for the purposes of calculating residential density. The proposed 284 residential dwellings over 0.5 ha would give a density of 568 dwellings per hectare (1,494 hr/ha).

This is above the upper end of the range identified in Table 3.2. The optimum housing density for this site should be determined taking into account local context and character, design and public transport capacity. Its location within an emerging major town centre, adjacent to the transport interchange and open space weigh in favour of a high density scheme. The design quality of the proposal and its impact on public transport capacity, together with other environmental and social impacts, are assessed elsewhere in this report. Subject to compliance with the relevant London Plan design and transport policies the proposal would be consistent with London Plan Policy 3.4.

Children’s play space

London Plan Policy 3.6 requires developments that include housing to make provision for play and informal recreation, based on the expected child population generated by the scheme and an assessment of future needs. Guidance on the application of this policy is set out in the ‘Shaping Neighbourhoods: Children and Young People’s Play and Informal Recreation SPG’.

The applicant estimates that there will be approximately 26 children in the development, comprising: 0-4 years – 15 children; 5-10 years – 7 children; and 11-15 years – 4 children. The guidance sets a benchmark of 10 sq.m. of useable child play space to be provided per child, with under-5 child play space provided on-site.

The proposal accordingly includes provision for at least 150 sq.m. of playable space within the 450 sq.m. communal courtyard. Beyond this the proposal will rely on the existing provision in St Mary’s Churchyard, including the extensive purpose designed play areas adjacent to the proposal and readily accessed without crossing any streets. The landscape strategy includes an illustrative masterplan taking in the adjacent leisure centre site and the interface with St. Mary’s Churchyard, which would further improve access to this open space. This holistic approach to improving the public realm in the area is welcomed.

The proposal is consistent with London Plan Policy 3.6. The Council should make implementation of the above measures, including the submission of details as necessary, a condition of any planning consent with any off-site improvements to St. Mary’s Churchyard secured as a planning obligation.

Urban design, strategic views and the historic environment
Chapter 7 of the London Plan sets out design related policies addressing both general design principles and specific design issues. Policy 7.1 establishes a series of overarching design principles for building London’s neighbourhoods and communities. Policy 7.6 sets out strategic policy on architecture. Policy 7.7 sets out specific policy on the location and design of tall and large buildings. Policies 7.8, 7.9 and 7.10 set out strategic policy on heritage assets, archaeology and World Heritage Sites. Policies 7.11 and 7.12 set out strategic policy on the London View Management Framework, which is expounded in the London View Management Framework SPG. The Elephant and Castle SPD and OAPF provides area specific guidance on design matters.

**Urban design**

The proposed configuration of buildings is well resolved in response to the existing and emerging site context, including the adjacent leisure centre proposal. The interface with the latter and St. Mary’s Churchyard is being coordinated through an overarching landscape strategy, including an indicative masterplan, which should ensure a seamless approach to the public realm. This approach is supported though it is noted that the implementation of elements of this will rely on the leisure centre proposal and works to St. Mary’s Churchyard which the Council should duly assess and take forward with the applicant.

The proposal would form a small urban block fronting Elephant and Castle, St Mary’s Churchyard, Brook Drive and a reinstated Pastor Street. The introduction of the latter is a particularly positive outcome that will open up this area and improve both access and public safety. The block would comprise an ‘L’ shape pavilion block to Elephant and Castle and Brook Drive and a tower to the southwest corner of the site, fronting St Mary’s Churchyard, with a communal amenity space between.

The frontages to Elephant and Castle and St. Mary’s Churchyard have been aligned to the Metropolitan Tabernacle and the entrance of the new leisure centre respectively, thereby ensuring the proposal would create a coherent termination to the built form on this side of Elephant and Castle and promote the visibility of the new leisure centre entrance. At ground level these principal frontages would contain retail units and residential entrances, as would be expected given the location, and the public realm masterplan appropriately anticipates the need for break out retail and seating space for the south facing unit fronting St Mary’s Churchyard.

The ground and mezzanine level frontage to Brook Drive would comprise a series of small office units, a residential entrance and the glazed flank of one of the retail units facing Elephant and Castle. The levels above would be residential. This approach is supported in terms of ensuring that this route, which is currently an unattractive alley, would be opened up into an active and well overlooked part of the local route network. This is particularly welcomed in terms of improving access to the transport interchange at all times of day from the area to the west.

The western elevation would front the new public space between the proposal and the leisure centre and contain the car park and servicing access for the block. The architect has sought to animate this frontage by the introduction of windows to the office units and residential lobby at either end which is supported. This elevation will nonetheless need to successfully accommodate a sub-station, the entrances to the car park and servicing area and a blank wall to the cycle park. The Council should duly ensure that the design of these elements would be of a sufficiently high standard through its scrutiny of materials and detailing.

The lobby access off this elevation is positive in terms of providing direct access to the cycle store and for those being picked up or dropped off in the adjacent turning area. That being the case the doors here should be power assisted to ensure ease of use by wheelchair users and cyclists.
The internal planning of the pavilion block, the tower and the communal courtyard space is well resolved. The architect has sought to ensure that the residential units in the pavilion block would be dual aspect and have a private amenity space facing the courtyard. This is a positive approach given the levels of traffic on Elephant and Castle and should also ensure the courtyard is sufficiently shielded from this.

The scale, massing and architectural treatment of the pavilion block has rightly been driven by this building’s relationship with the Metropolitan Tabernacle immediately to the north. The scale and massing would be suitably deferential and the architectural approach simple and restrained, with extensive use of reconstituted stone. The facade of the pavilion would successfully echo the proportions and rhythm of the portico colonnade of the Metropolitan Tabernacle, which will ensure a harmonious relationship between the two when viewed from Elephant and Castle. This approach is supported.

The Elephant and Castle SPD and OAPF identifies the vicinity as a gateway to the Opportunity Area in which there will be a transition in built scale from the area to the south, which is predominately low and medium rise. The position of the 37 storey (127 m AOD) tower on the site has taken account of this, the strategic viewing corridor from LVMF 28 and the contextual relationship with the Metropolitan Tabernacle, St. Mary’s Churchyard and the existing and emerging tall buildings in the vicinity, notably Strata (44 storeys; 147 m AOD) and the consented proposal on the site of the former London Park Hotel (143 m AOD).

The architectural approach to the tower would also adopt a simple and restrained approach. The design intent is that this building will be readily understood as a residential building with the plan form and notably the balconies being expressed to signal to this. The result is a repetitive rectangular form that would taper at the upper levels to reflect the changing floor plan. The materials palette would be common to that of the pavilion building but would make more extensive use of metallic cladding in varied brass coloured shades. The final choice of materials will be made at the detailed design stage and the Council should duly ensure that the materials and detailing would be of the high standard demanded by a building of this nature.

Strategic views and the historic environment

The applicant has submitted a comprehensive Townscape, Visual and Built Heritage Assessment in support of the proposals.

The Metropolitan Tabernacle (listed Grade II) to the north is the nearest heritage asset. The proposal has been carefully considered in relation to this asset and the proposal would, subject to detailing, enhance its setting. Beyond this the proposal would affect a number of local views and the setting of a range of heritage assets in the local area, include some recently proposed Conservation Areas. This has been considered and will be discussed with Council officers. The Council should duly consider these matters and have regard to this in determining the application.

The applicant has assessed the impact on strategic views. The proposal would not be visible in the London panorama from Primrose Hill (LVMF 4). The proposal would be visible from the river prospects from Waterloo Bridge (LVMF 15) and Victoria Embankment (LVMF 20). In both instances it would appear as an inconspicuous and distant form amongst existing development south of the river.

The applicant has also tested a view from Victoria Tower Gardens (Grade II Registered Landscape) towards Lambeth Palace (listed Grade I). This shows the proposal appearing alongside and below Strata in the backdrop of the Lambeth Palace. It would be readily visible along with other tall buildings in the urban area beyond but would not dominate the setting of Lambeth Palace and would not harm the setting of this heritage asset.
The principal view for consideration in terms of strategic views and the setting of the Palace of Westminster World Heritage Site is that from Serpentine Bridge in Hyde Park (LVMF 23). The LVMF visual management guidance for this view identifies that new buildings in the background must be subordinate to the World Heritage Site (WHS). The applicant has duly comprehensively assessed the proposal from assessment point 23A.1 and from a sequence of points either side of this which provide a sense of the kinetic views afforded of the Palace of Westminster from the Serpentine Bridge.

This view is subject to a Protected Vista. The Wider Setting Consultation Area for the background of this Protected Vista crosses the northern part of the application site. That being the case the tower has been positioned in the south of the site, outside this area. This results in the proposed tower being obscured by trees in the foreground of this view when viewed from the assessment point in both summer and winter.

The series of views either side of the assessment point show that the uppermost part of the proposal would be visible along with the existing Strata tower in views from the northern end of the Serpentine Bridge. The proposal would then be progressively obscured by trees in the foreground, in both summer and winter, as the viewer approaches the assessment point and moves south beyond this.

It is noted that the points at the northern end of the Serpentine Bridge where the proposal and Strata would be most visible do not afford a complete view of the WHS as this is also progressively revealed as the viewer moves south over the bridge. A complete view of the components of the WHS occurs at LVMF 23A.1 and at this point the proposal would be obscured as described above. On the basis of the townscape analysis submitted the proposal would not compromise the ability of the viewer to appreciate the Outstanding Universal Value, integrity, authenticity and significance of the Palace of Westminster WHS or harm the setting of its component heritage assets.

Summary

The proposed design would be consistent with London Plan polices 7.1, 7.3, 7.4, 7.5, 7.6, 7.7, 7.8, 7.9, 7.10, 7.11 and 7.12.

Inclusive access

Policy 7.2 of the London Plan expects all development to meet the highest standards of accessible and inclusive design. This, together with the Mayor’s Supplementary Planning Guidance ‘Accessible London: achieving an inclusive environment’, underpins the principles of inclusive design and aims to achieve an accessible and inclusive environment across London. Policy 3.8 of the London Plan requires all new housing to be built to ‘Lifetime Homes’ standards and ten percent of all new housing to be designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users.

The proposal is supported by a Design and Access Statement and an Access Statement. These demonstrate that lifetime neighbourhoods (Policy 7.1) and inclusive design (Policy 7.2) have been appropriately considered in developing the design.

The accessibility of the site in terms of public and private transport has been considered and reflected in the design. It is noted that some of the deficiencies identified in the accessibility of some forms of public transport will be addressed through improvements proposed in the Elephant and Castle SPD and OAPF, to which this proposal will contribute. In terms of private transport there will be 23 blue badge parking bays in the basement together with parking for mobility scooters. There would also be blue badge parking, together with pick-up and drop-off
areas in the new public space adjacent to the proposal. These would be within a short distance of all entrances and lift cores.

72 The proposal would enhance the existing public route network in the vicinity and the commercial and residential entrances would all be readily legible from these routes. The resident’s communal facilities including the courtyard amenity space would all be readily accessible.

73 In terms of residential units the applicant has committed that all residential dwellings will comply the Lifetime Homes standards and ten percent will comply with GLA Wheelchair Accessible Housing standards. This is substantiated by plans of these units submitted with the application. The applicant has committed that where units are sold to someone requiring a wheelchair adapted unit it would then finance the fit out of that unit in accordance with specific adaption requirements, which is welcomed. This matter is further addressed in the ‘housing choice’ section above. The commercial units are capable of incorporating internal lifts to their mezzanine level if these are installed.

74 In summary, the proposal is consistent with London Plan Policy 7.2. The Council should make the implementation of these measures a condition of any planning consent.

Equalities

75 The 2010 Equality Act places a duty on public bodies, including the GLA, in the exercise of their functions, to have due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it. This requirement includes removing or minimising disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic and taking steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it. The Act defines protected characteristics and includes age and disability.

76 The GLA in the discharge of its planning function must engage this duty, in so far as it is applicable to a particular case. London Plan Policy 3.1 sets out the strategic policy on ensuring equal life chances for all. The Elephant and Castle SPD and OAPF has been subject to an Equalities Impact Assessment, which was published in tandem with the document.

77 The present consistency of the proposal with the Elephant and Castle SPD and OAPF is as set out in this report. The application is supported by a socio-economic impact assessment, which concludes that the proposal will make a positive contribution to the overall regeneration objectives of the Elephant and Castle Opportunity Area.

78 The application has been reviewed in the context of the above legislation and policy requirements and would be consistent with these, subject to the addition of satisfactory planning obligations and conditions securing the measures and benefits identified. The Council should nonetheless fulfil its statutory equality duty in determining the application.

Noise and air quality

79 London Plan policy on noise is set out in Policy 7.15. The applicant’s noise and vibration assessment has been reviewed and clarification has been sought from the applicant on a number of points. This request has been shared with the Council. The proposal does not raise any strategic concerns at this stage but the applicant should respond to the request for clarification and address
any outstanding matters. The Council should take account of the applicant’s response and attach planning conditions to any consent to ensure compliance with London Plan Policy 7.15.

80 London Plan policy on air quality is set out in Policy 7.14. The applicant’s air quality assessment has been reviewed and it is noted it does not include any consideration of the impact of the proposed combined heat and power (CHP) plant on local air quality. The applicant should discuss this matter with Council officers and submit further information, including impact modelling as necessary based on the anticipated plant for Option 2, to demonstrate that the proposed option would be consistent with London Plan Policy 7.14. The Council should attach planning conditions to any consent to ensure compliance with London Plan Policy 7.14.

Climate change mitigation and adaptation

81 The London Plan climate change policies as set out in Chapter 5 collectively require developments to make the fullest contribution to the mitigation of and adaptation to climate change and to minimise carbon dioxide emissions.

Climate change mitigation

82 The applicant has broadly followed the energy hierarchy. Sufficient information has been provided to understand the proposals as a whole but further information is required before the carbon savings can be verified. The applicant should, taking into account the comments below and using Table 1 and 2 in the GLA energy assessment guidance, confirm the overall carbon dioxide emissions and the regulated carbon dioxide emissions savings in tonnes per annum and percentage terms at each stage of the energy hierarchy relative to a 2010 compliant development.

Be lean

83 It is unclear from the information provided whether or not the development will achieve any savings in regulated carbon dioxide emissions from energy efficiency alone compared to a 2010 Building Regulations compliant development. The energy strategy has been drafted with reference to the defunct 2006 Building regulations. All references and figures derived in relation to 2006 regulations should be removed and the figures updated to 2010 regulations.

84 The strategy identifies a number of passive and energy efficiency measures but these should be modelled, along with any additional energy efficiency measures required, in the energy strategy which should also commit the development to exceeding 2010 Building Regulations compliance through energy efficiency alone.

Be clean

85 The energy strategy identifies three options. Option 1 would connect the proposal to the district heating network anticipated as part of the redevelopment of the Heygate Estate. Option 2 would include an energy centre within the proposal, containing gas CHP and boilers, serving both the proposal and the proposed leisure centre. This would be capable of connection to the district heating network at a future date. Option 3 would be the same as Option 2 but serve the proposal only.

86 Option 1 is the preferred approach but the proposal is likely to be completed in advance of the district energy network coming online. That being the case the applicant intends to pursue Option 2 and connect to the district energy network when this becomes available.
The applicant has committed to ensuring the design compatibility of the proposed system with that of the district heating network. It is understood that capacity exists to serve the development but the applicant should confirm this and the potential timescale for connection.

The applicant also should commit to installing a site-wide heat network connecting all apartments and non-domestic building served from the energy centre proposed under Option 2. A drawing showing the route of the heat network linking all buildings on the site should be provided. Further information on the required floor area for the energy centre should be provided and secured by planning condition or in the section 106 agreement as appropriate.

The applicant should also confirm the CHP size proposed (supported by load profiles). Using Table 1 and 2 in the GLA energy assessment guidance the applicant should confirm the reduction in regulated carbon dioxide emissions in tonnes per annum and in percentage terms relative to a 2010 compliant development.

The Council should duly secure the provision of the site-wide heat network, energy centre and future connection to the district energy network through the section 106 agreement for the application.

Be green

The applicant has investigated the feasibility of a range of renewable energy technologies and is proposing to install photovoltaic panels which it is anticipated will generate 13 kWp peak. The applicant has submitted a roof plan drawing showing the potential location for the photovoltaic panels but should confirm the area to be provided and the reduction in regulated carbon dioxide emissions achieved in both tonnes per annum and percentage terms. The commissioning and ongoing operation of these panels should be secured by planning condition.

It is noted that were the proposal to connect to the district energy system it would also benefit from the proposed renewable element of that system. The Mayor’s consultation comments on that system are set out in the report on that case (ref: PDU/2149/01).

Climate change adaptation

The applicant has submitted a comprehensive sustainability strategy drawing together related strategies and assessments on energy, transport, and waste amongst others. The strategy demonstrates that the proposal would meet the requirements of London Plan Policy 5.3, the essential standards set out in the Sustainable Design and Construction SPG and the requirements of the London Plan climate change adaptation policies.

The successful implementation of this strategy, and the related strategies, will rely on planning conditions and appropriate provisions in the section 106 agreement. The Council should duly ensure the implementation and ongoing operation and maintenance of all measures is secured through planning conditions and section 106 provisions as appropriate. The proposals are consistent with London Plan policies 5.3 and 5.9 – 5.15 subject to the relevant provisions being agreed by GLA officers.

Summary
The proposal is currently inconsistent with the climate change mitigation policies of the London Plan, namely policies 5.2, 5.5 – 5.8. The applicant should address the comments regarding the energy strategy, notably the need to model the proposal against current building regulations, and update this as necessary.

The proposal is consistent with the climate change adaptation policies of the London Plan, namely policies 5.3, and 5.9 – 5.15.

The Council and the applicant should liaise with the GLA in drafting suitable planning conditions and obligations regarding all aspects of climate change adaptation and mitigation, including the final agreed energy strategy.

**Transport**

The Southwark Core Strategy and Elephant and Castle SPD and OAPF identify the strategic transport interventions required to provide the necessary transport capacity to support growth in the Opportunity Area. These include capacity improvements to the Northern Line Ticket Hall and pedestrian and cycle improvements to the Northern Roundabout. There is also a need to improve bus standing and increase bus service capacity and improve cycle infrastructure.

The Elephant and Castle SPD and OAPF establishes a strategic transport section 106 tariff for new development in the Opportunity Area. This will contribute some of the funding needed to deliver the strategic transport interventions identified but is not currently anticipated to raise the full cost of these works. The funding package for the works has yet to be established and remains subject to discussion amongst the stakeholders. The applicant will be expected to make contributions in accordance with the tariff and as identified elsewhere in this report, including improvements to bus provision and cycle infrastructure, in order to mitigate the impact of the proposal.

TfL met with Southwark Council, the applicant and its agents in May to discuss the proposal prior to submission. The outstanding strategic transport issues are discussed below.

**Trip generation**

The trip generation analysis set out in the transport assessment shows a surprisingly low overall predicted trip rate for the residential element, for example predicting only 77 departures in the AM peak and 47 arrivals in the PM peak from a 284 unit development. It also predicts a low cycle trip generation (2 AM peak departure, no PM peak arrivals) and a very high predicted mode share for walking (41% to 43% of all trips).

The applicant has recently submitted a planning application for the Heygate Masterplan where the trip rates and some mode share predictions for the residential element are significantly different. For example the residential trip rates applied to the Heygate masterplan are over twice as high for AM peak departures and PM peak arrivals than for the St Mary’s residential element. The predicted percentage mode share for walking applied to the St Mary’s residential element is twice that of the Heygate masterplan, whereas the Underground percentage mode share is half of that applied to the Heygate masterplan. The applicant should therefore provide further justification for the trip rates and mode shares used and explain the discrepancies with the corresponding figures used for the Heygate Masterplan in order to demonstrate accordance with London Plan Policy 6.3.

**Strategic transport impacts and mitigation**
The cumulative impact of development in the Opportunity Area will have an adverse impact on strategic transport, particularly on public transport capacity. TfL strongly believes that all planned developments in the Opportunity Area should therefore contribute towards the mitigation required, in accordance with London Plan Policy 6.3.

The draft section 106 heads of terms include a financial sum due under the Strategic Transport Tariff, which will contribute towards improvements at the Elephant & Castle northern roundabout and capacity enhancements at the Northern Line ticket hall. The Council should confirm that the calculation is accurate and accords with the requirements of SPD 20 in the Elephant & Castle SPD and OAPF.

TfL analysis has shown that additional peak bus services will be required in the Opportunity Area to ensure passengers are not left behind and/or experience unacceptable wait times. This increase in bus frequency is supported by SPD 10. ‘Pump prime’ funding is therefore required and a contribution to this service provision should be included in the section 106 agreement.

A contribution of £135,000 (reducing to £110,000 should bus standing be secured in the Heygate character area through the Heygate masterplan planning application) is appropriate, as this equates to approximately 10 per cent of the cost of service ‘pump priming’ required (£1.35m, or £1.1m with bus stand provision). This will be required prior to first occupation. The St Mary’s residential element represents approximately 10 per cent of the circa 3,000 residential units planned for the Opportunity Area (over and above already committed development). This is necessary to comply with London Plan policies 6.3 and 6.7.

Parking

The proposed level of car parking appears to be broadly in line with maximum London Plan standards in terms of numbers of spaces. However, the Council’s car parking policy is for developments in Elephant & Castle to be car free as it is part of the central activity zone (CAZ) (SPD12). TfL would support the Council should they wish to require a lower level of parking. This is supported by London Plan Policy 6.13 which supports car free development in areas of high public transport accessibility, whilst still providing blue badge provision. It is expected that residents will be ineligible for on-street parking permits within the surrounding controlled parking zone.

The provision of electric vehicle (EV) charging infrastructure and cycle parking to London Plan standards and a high level of blue badge parking are welcomed. It is noted that two on-street car club spaces are proposed and TfL would support the Council should this be considered inadequate.

The transport assessment suggests it may be appropriate to provide a 24 space Cycle Hire docking station. Space for the docking station should be identified and safeguarded together with a financial contribution of £189,000, or delivered ‘in kind’ in agreement with TfL, in order to accord with London Plan Policy 6.9. This should be secured in the section 106 agreement.

The provision of car parking on the ‘shared space’ between the proposed new Leisure centre and the development is not adequately justified in the transport assessment. The provision here, particularly the single St Mary’s visitor bay, should be re-evaluated. This space needs to provide an attractive, pedestrian friendly environment at the entrance plaza to both the leisure centre and the St Mary’s development and accommodate servicing and drop off/pick up (see also below). The number and position of parking spaces should not compromise this.

It is suggested that better use of the leisure centre frontage on Brook Drive could be made, with the number of on-street parking bays increased – for example by extending into the area
where there is currently single yellow line, opposite Oswin Street. The three bays closest to the leisure centre could be designated as blue badge bays. Proposals for how parking and the other uses of the shared space generally will be controlled should also be provided, in order to demonstrate compliance with London Plan Policy 6.10. A condition requiring the submission of an appropriately detailed management plan for this area is also recommended.

**Taxis and private hire**

112 The transport assessment makes no distinction between taxis (black cabs) and private hire vehicles (PHVs / minicabs), which are both likely to serve the proposal. There is likely to be a low demand from the development, but some taxis/PHVs are expected and will need to pick up and set down their passengers. The leisure centre is also expected to create a demand. The transport assessment states that a set-down point is not considered necessary as taxis and PHVs can set down on public highway. This is correct, but they are not allowed to wait on red routes, in this case Elephant and Castle adjacent to the site, so pre booked taxis and PHVs will need to be accommodated. Setting down on red routes can also cause congestion and safety issues, particularly in a sensitive traffic and high cycle movement locations such as Elephant and Castle. Therefore the informal pick up/drop off facility proposed in the transport assessment for the shared surface should be actively promoted for taxis and PHVs (see also above).

**Elephant and Castle frontage**

113 The applicant proposes to provide a new urban realm along the eastern frontage of the development. TfL has recently delivered significant enhancement to the area as part of the southern roundabout removal scheme and therefore it is welcomed that the applicant has undertaken to retain the maximum amount of existing paving. The details of the proposed urban realm scheme associated with the development, in particular the materials proposed and tie-in to the existing footway should be agreed with the Council and TfL. The extent of highway land, maintenance responsibilities and rights of way will also need to be discussed and agreed between the three parties. These requirements should be secured as a condition of planning permission. TfL would be unwilling to take on additional maintenance responsibilities as highway authority without a commuted sum payment secured within the section 106 agreement.

114 Any works proposed to be undertaken by the applicant on or adjacent to the TfL route network (TLRN) may require a section 278 agreement with TfL, or section 106 funding provided should TfL be requested to carry out the works.

**Travel plan, deliveries and servicing**

115 In accordance with London Plan Policy 6.3, the travel plan should be discussed and agreed with the Council, in consultation with TfL, and secured as condition of planning approval, supported as appropriate by obligations in the section 106 agreement. The travel plan should include targets and corresponding measures to encourage greater use of national rail services, in order to reduce demand on the Northern Line Ticket Hall and bus services in advance of any capacity enhancements to either.

116 The delivery and servicing plan should be agreed with the Council, in consultation with TfL. It should be secured as a condition of any planning permission, supported as appropriate by obligations in the section 106 agreement, in accordance with London Plan Policy 6.3 and SPD 13. The key requirement is that servicing should take place off the TLRN and should not impact on pedestrians and cyclists.

**Construction**
TfL has discussed options for construction traffic with the applicant and has accepted the principle of temporary access to the site from Elephant and Castle and egress along Oswin Street. This will minimise adverse impacts on both the TLRN and CS7. The details of this arrangement must be developed and agreed with TfL.

A lay-by alongside Elephant and Castle for long vehicles is also accepted in principle, subject to agreement of the detailed arrangements. TfL would not, however, accept a reduction in bus stopping space on Elephant and Castle. The access from Elephant and Castle and the lay-by should not be in use at the same time as this could be confusing for pedestrians.

Any adverse impact on the existing public realm on Elephant and Castle from construction activities would need to be made good and all costs associated with any temporary traffic management measures on the TLRN would need to be met by the applicant.

To meet these requirements and to accord with London Plan Policy 6.3 a detailed construction management plan (CMP) will need to be agreed in writing with TfL and the Council. This should be required as a condition of planning approval. An informative should be included advising the applicant to contact TfL prior to the development of the detailed CMP.

Any access or egress off Elephant and Castle will require agreement (in addition to any planning approvals) with TfL under the Traffic Management Act 2004. It is also likely that lane rental charges will be payable to TfL for any temporary closure of carriageway and/or footway on Elephant and Castle.

There are a number of potential constraints on the redevelopment of a site situated close to underground tunnels and infrastructure. In order to accord with London Plan Policy 6.3, the applicant will need to demonstrate to the satisfaction of London Underground (LU) Infrastructure Protection engineers that the development will not have any detrimental effect on LU tunnels and structures either in the short or long term.

The design must be such that the loading imposed on LU tunnels or structures is not increased or removed. LU offers no right of support to the development or land. These requirements should be secured by a condition of any planning permission that the development should not be commenced until detailed design and method statements for all of the foundations, basement and ground floor structures, or for any other structures below ground level, including piling (temporary and permanent), have been submitted to and approved in writing by the Council, in consultation with LU Infrastructure Protection. The applicant must provide details on all structures, accommodate the location of the existing LU structures and tunnels, accommodate ground movement arising from the construction and mitigate the effects of noise and vibration arising from the adjoining operations within the structures and tunnels.

The applicant is advised to contact LU Infrastructure Protection in advance of preparation of final design and associated method statements, in particular with regard to: demolition; excavation; construction methods; security; boundary treatment; safety barriers; landscaping and lighting. This should be an informative of any planning permission.

Summary

In summary the following strategic transport issues must be addressed prior to the Council determining the application, in order to accord with London Plan policy:

- Verifying the trip generation for the residential element by cross referencing to the Heygate masterplan planning submission;
• The Council’s verification of the calculation of the strategic transport contribution;

• Clarification of the arrangements for the shared space, including provision for taxis and PHVs;

• Agreement on the wording of conditions and/or section 106 agreement to provide a contribution to pump priming for bus service capacity enhancements, to secure a 24 space cycle hire docking station and to secure an agreed travel plan, deliveries and servicing plan, construction methodology and management plan and landscape/maintenance plan detailing the Elephant & Castle frontage treatment.

126 At present the application does not comply with London Plan policies 6.3, 6.7, and 6.9.

Local planning authority’s position

127 This is yet to be determined.

Legal considerations

128 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

129 There are no financial considerations at this stage.

Conclusion

130 London Plan policies on land use, regeneration, housing, children’s play space, urban design, inclusive access, equalities, noise, air quality, 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:

• Land use and regeneration: the proposed land uses are consistent with those anticipated by the London Plan and the Elephant and Castle SPD and OAPF but the enabling role of the proposal needs to be substantiated in order to confirm compliance with London Plan policies 3.16, 3.19 and 8.2.

• Housing: the proposal is consistent with London Plan policies 3.4, 3.5 and 3.8. The proposal is currently inconsistent with London Plan polices 3.11 and 3.12.

• Children’s play space: the proposal is consistent with London Plan Policy 3.6.

• Urban design: the proposal is consistent with London Plan policies 7.1, 7.3, 7.4, 7.5, 7.6, 7.7, 7.8, 7.9, 7.10, 7.11 and 7.12.
- **Inclusive access:** the proposal is consistent with London Plan Policy 7.2.

- **Equalities:** the proposal is consistent with London Plan Policy 3.1.

- **Noise and air quality:** the proposal is currently inconsistent with London Plan policies 7.14 and 7.15.

- **Climate change mitigation and adaptation:** the proposal is currently inconsistent with the climate change mitigation policies 5.2, 5.5 – 5.8. The proposal is consistent with the climate change adaptation policies 5.3, and 5.9 – 5.15.

- **Transport:** the proposal is inconsistent with London Plan policies 6.3, 6.7, and 6.9.

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

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

- **Land use and regeneration:** the applicant should substantiate the enabling role of the proposal in order to confirm compliance with London Plan policies 3.16, 3.19 and 8.2.

- **Housing:** the applicant should, following the conclusion of the financial viability appraisal review, confirm the approach to affordable housing provision with GLA officers having regard to London Plan policies 3.11 and 3.12.

- **Noise and air quality:** the applicant should address the outstanding matters regarding these assessments in consultation with GLA and Council Officers towards compliance with London Plan policies 7.14 and 7.15.

- **Climate change mitigation and adaptation:** the applicant should address the deficiencies identified in the energy assessment and update this as requested to ensure the proposal would be consistent with London Plan policies 5.2, 5.5 – 5.8.

- **Transport:** the applicant should address the detailed comments raised in discussion with TfL and Council officers and ensure that the proposals would be consistent with London Plan policies 6.3, 6.7, and 6.9.