planning report PDU/2984/01

20 March 2013

Warren Farm, Southall

in the London Borough of Ealing
planning application no P/2012/5124

<table>
<thead>
<tr>
<th>Strategic planning application stage I referral (new powers)</th>
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<tr>
<td>Town &amp; Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007;</td>
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<td>Town &amp; Country Planning (Mayor of London) Order 2008</td>
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<th>The proposal</th>
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<td>Redevelopment of the site, to provide a first team training and academy facility for Queen’s Park Rangers Football Club and the re-provision of community facilities, 555 car parking spaces, flood lighting, boundary treatments, an additional vehicle and pedestrian point of access onto Windmill Lane, hard and soft landscaping and engineering works to re-grade the site to provide level playing surfaces.</td>
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<th>The applicant</th>
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<td>The applicant is Queens Park Rangers Football Club and the Community Trust and the architects are HB architects.</td>
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<th>Strategic issues</th>
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<td>The principle to deliver a training academy and community sports facilities is acceptable in strategic terms; however, further information and revisions with regard to sustainable development and transport are relevant to this application are required to address outstanding concerns, for the scheme to be considered as fully compliant with the London Plan.</td>
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<th>Recommendation</th>
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<td>That Ealing Council be advised that the application, on balance, does not yet fully comply with the London Plan for the reasons set out in paragraph 79 of this report; but that the possible remedies set out in this paragraph could address these deficiencies.</td>
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Context

1 On 7 January 2013 the Mayor of London received documents from Ealing Council 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 Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor’s use in deciding what decision to make.

2 The application is referable under the following Categories of the Schedule to the Order 2008, as follows:
• Category 3D (a) “development on land allocated as Green Belt or Metropolitan Open Land in the development plan, in proposals for such a plan, or in proposals for the alteration or replacement of such a plan; and (b) which would involve the construction of a building with a floorspace of more than 1,000 square metres, or a material change in the use of such a building.”

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

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

Site description

5 The Council-owned site of just under 25 hectares in size is part of an extensive area of green space, accessed off the eastern side of Windmill Lane in Southall; approximately midway between the elevated M4 motorway on the south and the First Great Western (London Paddington to Bristol) Railway Line on the north.

6 The eastern boundary is defined by a railway line and additional open space adjoining the Grand Union Canal/River Brent, beyond which lies industrial land on the Waterside Industrial Estate. To the west of Windmill Lane lies an enclave of residential properties to the north, a grade two listed brick wall enclosing Osterley Park, and a substantial private residence known as Aviary Farm to the south.

7 The land immediately to the north of the application site is owned by Imperial College and is currently used for the grazing of animals. Beyond this lies the predominately residential development of Hanwell and Southall. There are semi-detached houses along the existing narrow access from Windmill Lane into Warren Farm.

8 The site provides 6 cricket pitches; 16 football pitches and 8 former netball courts, which have fallen into a state of disrepair. Also on the site there are a cluster of single-storey buildings that provide poor quality changing rooms, a children’s day nursery and a Council depot. Those buildings have a total floorpace of 1,847sq.m.

9 The site is primarily used by local residents for the purposes of dog walking, exercise, cycling, weekend league football, croquet tournaments and access to Hanwell Flight of Locks and Meadows. The site is also used by the day nursery located on site and Warren Farm Radio Flyers.

10 Strategically, the site is designated as Metropolitan Open Land (MOL).

11 In transport terms, Warren Farm is located on Windmill Lane in Southall. The site is 1.3 km south of the A4020 Uxbridge Road which is part of the Strategic Road Network (SRN) and the nearest part of the Transport for London Road Network (TLRN) is the A4 Great West Road, 2.5km to the south of the site via Syon Lane.

12 There are no bus services running along Windmill Lane, with the nearest bus stops being on Uxbridge Road and these are therefore beyond the maximum recommended walking distance for bus services. The nearest mainline rail stations are at Southall, Hanwell and Syon Lane, all over 2km from the site, as is the nearest London Underground (LU) station, Boston Manor. Therefore, the public transport accessibility level (PTAL) for the site is 0, representing no access to public transport.
Details of the proposal

13 The applicant is proposing to demolish the existing structure on the site to provide a training and academy facility for Queens Park Rangers Football Club. The redevelopment will deliver a new training centre and will include provision of a club building, a multi-functional operations building and an artificial pitch and a covered pitch for the use of the club.

14 The development will include associated services including car parking, flood lights, storage facilities, boundary treatments and an additional vehicle and pedestrian point of access onto Windmill Lane.

15 As part of the proposals, the applicant intends to deliver the provision of enhanced community facilities, which will consist of up to 11 football pitches, 3 cricket wickets and a community building, offering improved changing and toilet facilities in accordance with the local authorities’ requirements.

Case history

16 On 28 June 2012 a pre-planning application meeting was held at City Hall and a pre-application advice report was issued to the applicant. This report concluded that in the light of overriding benefits to the local community and subject to the submission of satisfactory additional details, a highly credible case could be made to commend the principle of a sports building of the size and scale currently proposed on MOL.

Strategic planning issues and relevant policies and guidance

17 The relevant issues and corresponding policies are as follows:

- Principle of development: London Plan
- Green Belt/MOL: London Plan
- Playing fields: London Plan
- Urban design: London Plan;
- Access: London Plan; Accessible London: achieving an inclusive environment SPG; Planning and Access for Disabled People: a good practice guide (ODPM)
- Biodiversity/Geodiversity: London Plan; the Mayor’s Biodiversity Strategy; draft Tree and Woodland Strategies; London’s Foundations (Geodiversity) SPG
- Blue ribbon network: London Plan
- Sustainable development: London Plan; Sustainable Design and Construction SPG; Mayor’s Climate Change Adaptation Strategy; Mayor’s Climate Change Mitigation and Energy Strategy; Mayor’s Water Strategy

18 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the saved polices from the 2004 Ealing Unitary Development Plan, the 2012 Ealing Development (Core) Strategy and the 2011 London Plan.

19 The following are also relevant material considerations:

- The Early Minor Alteration to the London Plan
Principle of Development

Metropolitan Open Land (MOL)

20 As explained in paragraph 10 of this report, the site falls within Metropolitan Open Land (MOL). London Plan policy 7.17 indicates that MOL should have the same level of protection as designated Green Belt. In particular, this policy notes that “the strongest protection should be given to London’s Metropolitan Open Land and inappropriate development refused, except in very special circumstances; giving Essential ancillary facilities for appropriate uses will only be acceptable where they maintain the openness of MOL.”

21 The policy guidance of paragraphs 79-92 of the National Planning Policy Framework (NPPF) on Green Belts applies equally to Metropolitan Open Land (MOL) in London. Paragraph 87 of the NPPF states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. In addition, paragraph 89 of the NPPF states that ‘a local planning authority should regard the construction of new buildings as inappropriate in Green Belt’ and lists exceptions to this.

22 The existing structures on site comprise 1,850 sq. m. of internal floorspace; the site also includes other areas of hardstanding and the site comprises 2 hectares in terms of total development footprint. The applicant is proposing to develop 16,228 sq. m. of floorspace as a multi use facility supporting the training needs of the football club. This equates to an uplift of 14,378 sq. m. (floorspace). In terms of footprint the applicant proposes 3.53 hectares an uplift of 1.53 compared to the existing site. The figures given by the applicant currently are inconsistent and before the scheme is referred back at stage two clarification on proposed figures will be needed.

23 The majority of the proposed built development is focused within the existing area of hardstanding. The applicant considers that replacement of development in this area of the site will have minimum impact on the MOL, stating that this increased floorspace is provided through a careful use of the existing ‘Brownfield’ land with only a limited encroachment into ‘Greenfield land’. Again, the actual figure of amount of development encroaching on the ‘Greenfield land’ has not been given by the applicant and clarification of figures is needed before the scheme is referred back to the Mayor at stage two.

24 The associated increase of the multi functioning sports building in terms of quantum and massing does not meet development exceptions of NPPF paragraph 87; the proposals provide for a disproportionate addition over and above the size of the original building. Therefore, by definition the proposal is inappropriate, the only possible justification to allow this proposal would be if very special circumstances existed and were demonstrated before any recommendation for approval could be made. There is no definition of ‘very special circumstances’ and each planning application has to be judged on its own merits.

25 Notwithstanding the above, the NPPF also provides exceptions to inappropriate development; the retention of the outdoor sports provision and open space recreation areas are appropriate forms of development for the purposes of MOL, as set out in paragraphs 89 of the NPPF.

26 The key issue for the proposed development would be whether the harm to MOL, and any other harm, would be outweighed by very special circumstances. The latter can be summarised as: a compelling need for the development; the lack of alternative sites that are suitable, feasible and available; overriding benefits to the local community and the mitigation measures to minimise the harm to MOL.
Need for development

27 Over the past several years, existing facilities at Warren Farm have deteriorated sharply due to the prevailing constraints on public expenditure and a resulting lack of investment. The site is therefore unable to perform an effective role as a strategic location for community sports, although policy 5.6 of the recently adopted Ealing Development (Core) Strategy envisages the provision of “improved changing rooms, outdoor sports areas and social facilities.”

28 The Council identified in 2011 that it needed external investment to provide the finances required to improve the facilities. It embarked on a tendering process to identify an appropriate partner, the culmination of which was the selection of the Club as preferred bidder in the spring 2012. The Council encouraged potential development partners to suggest a facility mix which would provide a viable opportunity whilst ensuring access for community use within the site. 7.4 To assist this tendering process, the Council prepared a Development Brief for the site to offer informal planning guidance to potential project partners. Queens Park Rangers Football Club emerged from a bidding process as the Council’s preferred development partner.

29 The development proposals will deliver the needed enhancement of the sports pitches as well as delivery of a community building which will provide a high standard of changing and spectator area which overlooks the community pitches.

30 The applicant also includes a series of buildings for use by the football club. These facilities, some of which will also be available for use by the local community (indoor hall), have been design in consultation with the Council and represent a form of ‘enabling development’ to deliver the wider benefits to the local community.

31 It is evident from the foregoing, that there is a compelling need for new sports facilities on the site from the local community and a premieriership football club has the means to deliver the community sports facilities required. In accordance with the Council’s Development Brief for the site, the proposed development provides enhanced local community facilities.

Benefits to the local community

32 The Council’s planning brief for the site highlights the importance of open space for sport in a growing and densely populated area, identifying a particular shortage of open space in Southall West, Southall Green and Southall Town Centre. The brief also cites Sport England’s surveys of participation in sport, which demonstrate that the high proportion of Black, Asian and Minority Ethnic groups that characterise the local demographic profile are less likely to participate in physical activity. This, together with the prevailing high levels of deprivation, combines to produce poor outcomes in health.

33 Policy 3.1 affirms the Mayor’s commitment to ensure equal life chances for all Londoners and where appropriate, to address barriers to meeting the needs of particular groups and communities. The policy requires development proposals to protect and enhance facilities and services that meet the needs of particular groups and communities; it also states that proposals involving the loss of such facilities without adequate justification, or provision for replacement, should be resisted. Policy 3.2 requires new developments to be designed, constructed and managed in ways that improve health, promote healthy lifestyles and help to reduce health inequalities.

34 London Plan Policy 3.19 supports development proposals that increase or enhance the provision of sports and recreation facilities and resists the loss of such provision.

35 Proposals which maximise the extended or multiple use of education facilities for community or recreational use is also supported by London Plan policy 3.18. As part of the
development proposals, the application would enhance the current sports pitches and provide for new sports facilities for use by the local community.

36 In addition it should be noted that in line with the London Plan policy the QPR charitable trust’s aims of enhancing the life chances of individuals and neighbourhoods, working closely with football club and other partners to offer a diverse range of opportunities in football and sports development; community and health; education, training and employment; social inclusion and diversity; community and facility development; and strategic business development are particularly welcome.

Alternative sites

37 By its very nature, the development of a professional football training centre and academy comparable to that proposed by QPR requires a significant take up of land, which includes multiple standard-sized playing pitches, a building with a ground coverage that ranges between 3,500 and 8,000 sq.m. and a suitably-sized indoor pitch. The club needs to provide training academy as part of FA rules and therefore a number of premier clubs have training grounds on MOL/Green Belt sites.

38 The requirement becomes even more onerous for a dual football club and community facility, given Ealing Council’s separate requirement for the provision of community football pitches, cricket wickets, multi-use games areas, changing areas, a community space, and a number of class/flexible use rooms to accommodate a community development programme.

39 As part of the applicant’s justification for development on Metropolitan Open Land, the planning statement includes a section relating to alternative sites selection; a full review of sites has been undertaken and the applicant has concluded that no other suitable sites are indeed available and Warren Farm remains the most suitable option for this form of development given the Council’s requirements for a development partner.

Impact on openness of MOL

40 The essential point to make is that outdoor sports and recreation is an appropriate use of MOL and despite a significant net increase in the footprint of built development, the 24.8-hectare site would remain predominantly open.

41 In particular, the new building is designed to be sited in the relatively central position currently occupied by the existing dilapidated buildings, to avoid the visual impact of a dramatic change in the location of built development on the site.

42 The retention of buildings in that central position, in distance views away from the existing houses and Windmill Lane, helps to minimize the visual impact of the development. The development would also be screened by additional tree planting along the periphery of the site.

Summary

43 In summary, it is acknowledged that there is a need for the development and the need to enhance outdoor sports provision within the borough and improve facilities particularly at Warren Farm. The development would provide for an essential needed community use providing benefit to the community. The applicant has also demonstrated that there are no alternative sites for the proposals and the case for ‘very special circumstances’ in which development would be accepted on MOL has been given. In addition to this, the applicant has demonstrated that there will be minimal impact on the openness of the MOL. The principle is therefore acceptable in strategic terms.
However, there are currently inconsistencies in the floorspaces and footprint figures given which will need to be clarified before the scheme is referred back to the mayor at stage two.

**Urban design**

The proposed development sits on a significant expanse of open space and is located primarily on the location of the existing Warren Farm Sports Centre. The majority of the site will be occupied by sports pitches which will have little impact on the openness of the area and present no strategic design concern. However, care needs to be given to the impact of floodlighting on surrounding properties.

However, the development also includes a significant amount of hardstanding for the car parking adjacent to Windmill Lane which detracts from the rural character of the area which is a concern. The applicant is advised to put further consideration on the material used for the hardstanding and to include a generous amount of trees breaking up the otherwise expansive stretch of car park proposed.

The height and massing of the proposed buildings themselves are driven by the internal requirements of the proposed uses and cannot be modified significantly. Of these the largest and most prominent is the indoor hall which is 12 metres tall. All buildings are clad in reconstituted stone that creates a grand and civic aesthetic which is not particularly concerning. However, the applicant is advised to put further work on the architecture of the indoor hall so that the civic feel created by the cladding can be read at a distance.

In conclusion, whilst there is no significant strategic concern with the design of the development the applicant is advised to put further though on how the buildings are seen at a distance, how the car park can be less imposing and how the impact of floodlighting will be mitigated.

**Inclusive access**

Inclusive design principles if embedded into the development and design process from the outset help to ensure that all of us, including older people, disabled and deaf people, children and young people, can use the places and spaces proposed comfortably, safely and with dignity. The aim of London Plan Policy 7.2 is to ensure that proposals achieve the highest standards of accessibility and inclusion, not just the minimum. The applicant should therefore seek to design a scheme that is exemplary in terms of inclusive access.

The applicant has addressed inclusive assess within the proposed design in accordance with the objectives of a number of guidance documents including Equality Act 2010, Accessible Sport Facilities, Sport England 2010 (ASF), BS 8300:2009+A1:2010 Design of buildings and their approaches to meet the needs of disabled people - Code of practice, British Standards Institution, 2010 (BS 8300) and Building Regulation Approved Document M – Access to and use of Buildings 2004 and amended 2010 (AD M).

The development incorporated inclusive design particularly within the proposals address circulation, reception facilities and the community sports facility. The scheme complies with London Plan policy 7.2 and is acceptable in this regards.
Sustainable development

Energy strategy

52 The applicant has broadly followed the energy hierarchy to reduce carbon dioxide emissions and sufficient information has been provided to understand the proposals as a whole. The proposals are broadly acceptable; however, further information is required before the carbon savings can be verified.

Energy efficiency standards

53 A range of passive design features and demand reduction measures are proposed to reduce the carbon dioxide emissions of the proposed development. Both air permeability and heat loss parameters will be improved beyond the minimum backstop values required by building regulations.

54 Other features include mechanical ventilation with energy efficiency lighting. The demand for cooling will be minimised through the use of high performance glazing.

55 The applicant should confirm the sitewide level of regulated carbon dioxide emissions savings that will be achieved compared to a 2010 Building Regulations compliant development through energy efficiency alone. This should be expressed in tonnes per annum and in percentage terms.

District heating

56 The applicant has carried out an investigation and there are no existing or planned district heating networks within the vicinity of the proposed development. The applicant 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.

57 The applicant is proposing to install a separate energy centre to serve the three primary buildings with hot water and space heating from a central flow and return distribution ring.

Combined Heat and Power (CHP)

58 The applicant is proposing to install a 70 kW gas fired CHP unit as the lead heat source for the site heat network. The applicant should confirm the sitewide regulated CO\textsubscript{2} emissions from CHP alone expressed in tonnes per annum and in percentage terms.

Renewable energy technologies

59 The applicant has investigated the feasibility of a range of renewable energy technologies and is proposing to install a 50kW ASHP to provide heating and hot water for the maintenance building.

60 The applicant has identified potential areas for PV (up to 10,090m\textsuperscript{2}) located on the maintenance building, academy and north & south car park. For clarity, the applicant should confirm the actual area of PV to be adopted.

61 The applicant should confirm the sitewide regulated carbon dioxide emissions from renewables alone expressed in tonnes per annum and in percentage terms.
Overall carbon savings

62 In order to comply with London Plan policy 5.2, the applicant will need to demonstrate how the energy strategy meets the policy requirements of the London Plan through each stage of the energy hierarchy.

Transport

Car parking

63 It was originally proposed that 712 parking spaces will be provided on site; however, since the original submission, concerns raised by statutory consultees have been taken on board by the applicant and the proposed car parking total is now reduced to 555 spaces, designated as follows:

- Main courtyard area of Queens Park Rangers (QPR) - 119 spaces
- Community/Trust parking – 176 spaces
- Overspill parking (Grasscrete) area – 250 spaces
- Community parking (beside Community Building) – 10 spaces

64 Whilst TfL welcomes the proposed reduction, it should be noted that there are no standards relating to the proposed use in the London Plan, and as such TfL would expect that the level of parking provision ultimately agreed is fully justified through the transport assessment. At present, however, TfL does not consider that sufficient justification has been provided to confirm the acceptability of any proposed provision.

65 In respect of the overspill parking, no information has either been provided by the applicant on how many events in the year would require this parking, the parking demand associated with such events, or how its use would be controlled.

66 Given that the community uses and the proposed QPR training ground are likely to have different peak usage times, TfL additionally requests that the applicant investigates sharing parking provision between different uses on site with the aim of significantly decreasing the parking provision. This is also supported by the transport assessment’s suggestion that any events requiring overspill parking would be planned in advance and would need the permission of Ealing council and could therefore be planned for times when parking demand elsewhere on the site is lower.

67 The applicant has agreed that a Car Park Management Plan will be subject to a planning condition, and this is welcomed. However, a framework Car Parking Management Plan will need to be submitted. This should include information on how spaces would be allocated and shared, any restrictions on the use of spaces and how these would be enforced. Better management of car parking is also likely to mean that such a large area of overspill parking is shown not to be required, allowing the total car parking provision to be accordingly reduced.

68 Regardless of the parking provision ultimately agreed, there is no commitment to provide Electric Vehicle Charging Points (EVCP) on site. TfL considers that the lack of EVCPs and the excessive level of proposed parking, despite the remote location, do not currently make the proposals compliant with London Plan policy 6.13.

Trip generation

69 Although the transport assessment has considered vehicle trips arising from the use of the site as a QPR training facility, no consideration has however been given to non–vehicle trips or to
trips associated with the site’s community uses. Although it is acknowledged that there is some community sports use of the site at present, the number of changing rooms is very limited and as such the proposed development will lead to increased use. This is reflected in the proposal to substantially increase car parking for community uses.

70 The applicant’s trip generation assessment should therefore be refined, in line with TfL’s Transport Assessment Best Practice Guidance document and should be improved to consider all uses. Subsequently, the impact of an increased number of vehicular trips on the capacity of the Windmill Lane / Uxbridge Road junction will need to be submitted to the Borough and TfL before the application can be considered compliant with London Plan Policy 6.3

Walking and cycling

71 The proposed level of cycle parking for the site is unclear, although the applicant’s commitment to providing storage and showers for staff is welcomed. The number of cycle parking spaces will need to be confirmed before the application can be considered compliant with London Plan Policy 6.9.

72 Given the location of this site it is disappointing that a Pedestrian Environment Review System (PERS) audit of the conditions of the existing pedestrian environment has not been carried out. However, the transport assessment recognises that the footpath around the site is in poor condition and requires improvement. TfL would therefore recommend that a contribution is secured to deliver these improvements either through Section 106 or Section 278 as appropriate. TfL also requests that Legible London signing be introduced through this development as part of transport enhancement contributions. This signing should cover routes including that from the development to local bus stops and be secured through s106.

Travel Planning

73 A Framework Travel Plan for the development has been submitted by the applicant, which is supported. Unfortunately the Travel Plan has failed the ATTrBuTE tool assessment and a number of amendments are required. The Travel Plan should subsequently be secured, monitored, reviewed, and enforced through the s106 agreement. In addition, a framework Construction Logistics Plan (CLP) and Delivery and Servicing Plan (DSP) will need to be submitted and subsequently secured by condition to ensure compliance with London Plan Policy London Plan Policy 6.3 Assessing effects of development on transport capacity.

CIL requirement

74 In accordance with London Plan Policy 8.3 the application of the CIL charge commenced in April 2012 and will be paid by most new development in Greater London (noting that health facilities are exempt).

75 The Mayor has arranged boroughs into three charging bands, with rates of £50 / £35 / £20 per square metre of net increase in floorspace respectively. The proposed development is within the London Borough of Ealing where the proposed Mayoral charge is £35 per square metre. More details are available via the GLA website http://london.gov.uk/

76 London borough councils are also able to introduce CIL charges which are payable in addition to the Mayor’s CIL. Ealing Council is yet to adopt a scheme.
Local planning authority’s position

At the time of writing this report the Council’s formal position is unknown; however, Council officers are generally supportive of the scheme.

Financial considerations

There are no financial considerations at this stage.

Conclusion

London Plan policies on principle of development, urban design, inclusive access, sustainable development and transport are relevant to this application. The application complies with some of these policies but not yet with others and on balance does not yet comply with the London Plan. The reasons and the potential remedies to issues of non compliance are set out below:

- **Principle of development:** The applicant has set out reasons for ‘very special circumstances’ in which development would be accepted on MOL and as such the principle is accepted in strategic terms; however, there are currently inconsistencies in the floorspaces and footprint figures given which will need to be clarified before the scheme is referred back to the mayor at stage two.

- **Urban design:** The proposed design is generally supported in line with London Plan policies contained in chapter seven and the applicant has demonstrated that there will be no impact on openness of the MOL. The development is acceptable in this regard.

- **Inclusive access:** The scheme complies with London Plan policies 7.2 and is therefore acceptable.

- **Sustainable development:** In order to comply with London Plan policy 5.2, the applicant will need to demonstrate how the energy strategy meets the policy requirements of the London Plan through each stage of the energy hierarchy.

- **Transport:** Whilst TfL has no objections to the principle of the redevelopment, much further work is required by the applicant before the proposals can be considered acceptable. A justification of car parking levels is currently considered necessary, a framework Car Parking Management Plan is required and further information on trip generation, highway impact, cycle parking, EVCPs, servicing and construction is also required.

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