

Glengall Quay, Isle of Dogs

in the London Borough of Tower Hamlets

planning application no. PA/14/03585

Strategic planning application stage 1 referral

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

The proposal

Demolition of eight existing buildings, and erection of three buildings of up to 15 and 45-storeys, comprising 484 residential units, together with ground-floor commercial and community floorspace, and basement parking, together with access, servicing, and landscaping.

The applicant

The applicant is **Glengall Bridge Holdings Ltd** (on behalf of **Tameric Investments**), and the architects are **O'Mahony Pike** and **Metropolitan Workshop**.

Strategic issues

The principle of the redevelopment of this site for housing is supported. However, there are a number of outstanding strategic planning concerns relating to **housing, urban design, climate change** and **transport**.

Recommendation

That Tower Hamlets Council be advised that, whilst the principle of the redevelopment of this site is supported, the application does not comply with the London Plan, for the reasons set out in paragraph 76 of this report. However, the resolution of those issues could lead to the application becoming compliant with the London Plan.

Context

1 On 23 January 2015 the Mayor of London received documents from Tower Hamlets 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 has until 5 March 2015 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:

- **Category 1A:** *“Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats”.*
- **Category 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 sq.m.”.*
- **Category 1C:** *“Development which comprises or includes the erection of a building more than thirty metres high and outside the City of London”.*

3 Once Tower Hamlets 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 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 0.7 hectare site is located adjacent to Millwall Inner Dock within the Isle of Dogs. The site is bound to the west by Millharbour, and to the north, east, and south by Muirfield Crescent, a single-lane private estate road, which is paved, with no road markings, and operates one-way. Abutting this road to the north is a five-storey office building, to the east is a five-storey residential brick building constructed on Millwall Inner Dock, and to the south is Greenwich View Business Park, which comprises a number of low-scale shed buildings. Pepper Street dissects the site on an east-west orientation, and provides a pedestrian bridge crossing over Millwall Inner Dock, although elements of this route are also trafficked.

7 The application site comprises seven office buildings, three to four-storeys in height, all of which feature ground-floor commercial units which line Pepper Street, with office accommodation above. A stand-alone two-storey building comprising a public house also forms part of the application site. The site includes a total of 174 car parking spaces within both ground-floor and basement car parks.

8 The closest section of the Transport for London Road Network is the A1261, Aspen Way, located one kilometre to the north. The site is well served by public transport; Crossharbour Docklands Light Railway (DLR) station can be accessed 250 metres to the east, across Glengall Bridge, and South Quay DLR station is located 450 metres to the north. In addition, four bus routes operate along East Ferry Road (D3, D6, D8 and 135), which is 350 metres to the east. The site therefore has a good Public Transport Accessibility Level (PTAL) of four (on a scale out of six, where six is excellent).

9 The site sits within a number of strategic views and river prospects, as identified in the Mayor’s London View Management Framework, including View 1A.1: Alexandra Palace, View 2A.1: Parliament Hill, View 4A.1: Primrose Hill, View 5A.1: Greenwich Park, View 6A.1 Blackheath, View 11B.1: London Bridge, View 11B.2: London Bridge, View 12B.1: Southwark Bridge, and View 15B.1: Waterloo Bridge. The site also falls within the wider setting of the Maritime Greenwich World Heritage Site. At the local level, the site sits within the Millennium Quarter, as designated in the Council’s Managing Development Document, and adjacent to the Council’s emerging South Quay Masterplan Supplementary Planning Document.

Details of the proposal

10 Glengall Bridge Holdings Ltd (on behalf of Tameric Investments) is seeking full planning permission for the demolition of eight existing commercial buildings, and the erection of three buildings of up to 15 and 45-storeys in height, comprising 484 residential units, together with ground-floor commercial and community floorspace, and basement parking, together with access, servicing, and landscaping.

11 The proposal maintains Pepper Street, and positions two linear podium elements in an east-west orientation to the north and south of this route. The southern element comprises a two-storey podium with commercial floorspace and a residential entrance at ground-floor, residential amenity on the first-floor, including an external terrace area, and a 45-storey building. The southern element also includes ground-floor publicly accessible open space fronting the dock to the east. The northern element comprises a two-storey podium with commercial and community floorspace at ground and first-floor, and two residential entrances serving two fifteen-storey residential buildings situated at either end of the podium, with private external residential amenity space located between the two buildings.

Case history

12 The application considered here was subject to formal pre-planning application discussions with GLA officers, with five meetings being held on 26 August 2014, 22 September 2014, 23 October 2014, 13 November 2014, and 9 December 2014 (D&P/3474/pre-app). GLA officers welcomed the opportunity to engage with the applicant at an early stage in the development process, and as a direct consequence of meaningful and proactive planning discussions, a number of significant amendments to the scheme were secured. The principle of the housing-led redevelopment of this site was strongly supported, and planning discussions focused on matters regarding the scale of development, housing, urban design and tall buildings, inclusive design, sustainable development, and transport.

13 The Council is in the process of adopting a Supplementary Planning Document for the South Quay area to address issues arising from the scale of development proposed, including the provision of social infrastructure, and GLA officers have been closely involved in its preparation. Whilst this site sits outside the indicative boundary of the Supplementary Planning Document, it is located in its immediate context. The masterplan was out for public consultation from 5 January 2015 until 16 February 2015.

Strategic planning issues and relevant policies and guidance

14 The relevant issues and corresponding policies are as follows:

- Housing *London Plan; Housing SPG; Housing Strategy; draft Revised Housing Strategy; Shaping Neighbourhoods: Play and Informal Recreation SPG; Shaping Neighbourhoods: Character and Context, draft SPG*
- Affordable housing *London Plan; Housing SPG; Housing Strategy; draft Revised Housing Strategy*
- Density *London Plan; Housing SPG*
- Urban design *London Plan; Shaping Neighbourhoods: Character and Context, draft SPG; Housing SPG; London Housing Design Guide; Shaping Neighbourhoods: Play and Informal Recreation SPG*
- Tall buildings/views *London Plan; London View Management Framework SPG*
- Historic Environment *London Plan; World Heritage Sites SPG; Circular 07/09*
- Access *London Plan; Draft Accessible London: achieving an inclusive environment 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*
- Transport *London Plan; the Mayor's Transport Strategy*
- Parking *London Plan; the Mayor's Transport Strategy*

15 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is Tower Hamlets Council's Core Strategy (2010) and Managing Development Document (2013), and the 2011 London Plan (with 2013 Alterations).

16 The Further Alterations to the London Plan 'intend to publish' version as submitted to the Secretary of State (December 2014); the Council's Millennium Quarter Masterplan (2000) and draft South Quay Masterplan Supplementary Planning Document, and the National Planning Policy Framework and Technical Guide to the National Planning Policy Framework, are also relevant material considerations.

Principle of development

17 The site is located within the Isle of Dogs Opportunity Area, which London Plan Policy 2.13 (and supporting Table A1.1) identifies as a strategically significant part of London's world city business offer. Table A1.1 notes that Canary Wharf functions as a 'major' town centre for local workers and communities, and that surplus business capacity south of Canary Wharf provides an opportunity to deliver new housing, and to support a wider mix of services for residents, workers and visitors. Across the Opportunity Area as a whole, the London Plan identifies an indicative employment capacity of 110,000 jobs, and a minimum housing capacity of 10,000 units.

18 Notwithstanding the strong support for the delivery of a substantial proportion of housing within the Isle of Dogs Opportunity Area, as set out in the draft Further Alterations to the London Plan, there is strategic concern regarding the significant quantum of emerging proposals and the potential barriers to the delivery of this development, which includes the need to secure the social and physical infrastructure required to support this very significant scale of growth. In response to these concerns, the Council has produced a draft Supplementary Planning Document for the South Quay area to address issues arising from the scale of development proposed, the principle of which is broadly supported by the GLA.

Housing

19 London Plan Policy 3.3 provides explicit strategic support for the provision of housing within London. The draft Further Alterations to the London Plan sets a target for the Council to deliver a minimum of 39,314 homes in the Plan period 2015-2025. London Plan Policy 2.13 (and supporting Table A1.1) recognises the significant potential of the Isle of Dogs Opportunity Area to accommodate new homes, and identifies a minimum of 10,000 new homes. Given the site's context within the Isle of Dogs Opportunity Area, and the strategic priority afforded to housing, the principle of the housing-led redevelopment of this site, to include 484 new homes, is therefore supported.

Community uses

20 As set out in the draft Further Alterations to the London Plan, more effective coordination of social infrastructure is required within the Isle of Dogs Opportunity Area. The need to ensure adequate social infrastructure is also identified in the Council's draft South Quay Masterplan SPD.

21 The proposal includes the provision of a community facility, designed as a covered external space, three-storeys high, located on Pepper Street, with a double-height internal cafe area fronting it on its eastern aspect. The space is intended to be operated and used by a local community group for sports, community activities and/or the arts, and will be offered on a long-lease, with a peppercorn rent. The applicant has agreed to act as a trustee for up to five years, in addition to providing a £500,000 financial contribution, in order to support its initial set-up.

22 The provision of a community facility as part of this application is strongly supported, and has the ability to provide an important resource for the wider community. However, as discussed with the applicant, it is critical that a strategy is secured to ensure the long-term success of this space. As discussed in paragraph 43 below, the long-term success of this space is also critical to ensuring Pepper Street is an active and well-used street. The applicant has submitted an outline management plan for this space, which should be developed further, and its principle fully secured, as part of any future planning permission.

Office floorspace

23 The existing buildings on-site provide a total of 6,145 sq.m. of Class B1 office floorspace, currently occupied by range of small-scale office users. The proposal does not include any replacement office provision, although it is understood that the applicant has relocated some existing occupiers into a further site within its ownership located immediately to the north.

24 London Plan Policy 4.2 seeks to address the distinct needs of the Isle of Dogs office market, and to encourage renewal and modernisation of existing office stock in viable locations to improve its quality and flexibility. As set out above, London Plan Policy 2.13 (and supporting Table A1.1), makes clear that there is scope to convert surplus business capacity south of Canary Wharf. Given that strategic policy does not provide explicit protection for existing office use, but supports its retention and consolidation where viable, and allowing for its release where demand is low, and in light of the recognition that surplus business capacity can be released in this location, the loss of a small quantum of office floorspace as part of this application is acceptable in strategic planning terms.

Retail

25 The existing buildings on-site provide a total of 1,026 sq.m. of retail floorspace (Use Class A1-A4), currently occupied by a range of small-scale retail users located in ground-floor units which line Pepper Street, in addition to a public house. The application includes a total of 1,066 sq.m. of retail floorspace located within five units. These units have been positioned with frontages on both Pepper Street and either the dock edge, for those units in the eastern section of the development, or Millharbour, for those located to the west.

26 The London Plan seeks to support a competitive and diverse retail sector. In accordance with London Plan Policy 4.7, it is vital that large-scale retail be appropriately focused within the Isle of Dogs town centre network. However, the provision of a small-scale mix of uses as part of high-density development within Opportunity Areas can help to meet the needs of local residents, and also assist in activating the ground-floor. The inclusion of retail, bar, and restaurant space as part of this development is of an appropriate scale to be ancillary to the residential use, provides active uses at ground-floor, and is therefore supported in accordance with London Plan policy.

Housing

27 The application includes 484 residential units. A detailed housing schedule is provided below:

unit type	market	affordable rent	intermediate	total
studio	7	0	0	7
one-bed	188	20	8	216
two-bed	135	18	16	169
three-bed	50	22	8	80
four-bed	0	11	1	12
total	380	71	33	484

Affordable housing

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. The proposal currently includes 104 affordable units, which represents 21% of overall housing provision. The applicant has submitted a financial viability report in support of its proposals, which is being independently assessed by the Council. It is therefore not possible at this stage to determine whether the application provides the maximum reasonable amount of affordable housing in accordance with London Plan Policy 3.12.

29 London Plan Policy 3.11 establishes a strategic target that 60% of affordable housing provision be for social housing (comprising affordable rent and social rent), and 40% for intermediate provision. The Council, in its Managing Development Document, requires proposals to provide affordable housing on a 70:30 social housing to intermediate housing split. The affordable housing is currently split 68:32 when measured by units, which is in broad accordance with local policy, and is therefore acceptable.

30 In accordance with London Plan Policy 3.12, the applicant has stated that all affordable housing will be provided on-site. The applicant should engage with Registered Providers to ensure that the proposal appropriately responds to their requirements, and in order to provide officers with the certainty of delivery.

Housing choice

31 London Plan Policy 3.8, together with the Mayor's Housing SPG, and the draft Revised Housing Strategy, seek to promote housing choice and a balanced mix of unit sizes in new developments. London Plan Policy 3.11 establishes that strategic priority be afforded to the provision of affordable family homes. The proposal includes 92 family units, equating to 19% of overall housing provision. In accordance with strategic policy, the applicant has prioritised family affordable provision, and as such 42 of the family units are identified as affordable, equating to 40% of total affordable housing provision, and 46% of total social housing.

32 In accordance with strategic policy, which notes that studio provision should be exceptional in the context of overall housing provision, seven studios units are provided, equating to 1% of overall housing.

Density

33 The density of the development is 1,960 habitable rooms per hectare. This is significantly above the London Plan guidance range of 650 to 1,100 habitable rooms per hectare for central sites with a public transport accessibility level of four, as set out in London Plan Policy 3.4.

34 Whilst there is not an in-principle objection to high-density developments, as set out in paragraph eighteen of this report, there is strategic concern regarding the need to address potential barriers to the delivery of high density housing within the Isle of Dogs. The applicant should be mindful of the strategic priority, as established in Policy 3.4, that housing output be *optimised* taking into account, amongst others, the design principles of the London Plan, and take note of paragraph 1.3.41 of the Mayor's Housing Supplementary Planning Guidance with regard to high-density development, which states that "*Such proposals must also be assessed in terms of their bearing on the capacity of existing local amenities, infrastructure and services to support the development*". It is also important, as set out in the Mayor's SPG, that high density proposals be tested rigorously with regards to their contribution to local place shaping.

35 The application includes the provision of public open space adjacent to Millwall Inner Dock, as well as community facilities. As detailed in the relevant sections of this report, the proposal responds positively to London Plan policies relating to housing quality and urban design, provides an appropriate level of family accommodation, and exceeds London Plan policy requirements relating to children's play space. In this context, the density of the proposal does not in itself raise strategic concern. However, the applicant should note comments made in paragraphs 36 and 47 of this report regarding residential quality, and paragraphs 20 to 22 regarding the need to secure community floorspace.

Housing quality and design

36 London Plan Policy 3.5 promotes quality in new housing provision, with further guidance provided by the Mayor's Housing SPG. As set out in the Mayor's Housing SPG, proposals above the London Plan density matrix should be exemplary. Key factors such as floor-to-ceiling heights, orientation, maximising ground-floor individual access points, and number of units per core, are all essential to achieving high residential quality, and are of particular importance when assessing residential quality. As detailed in the urban design section below, the residential quality of the proposal has improved significantly through pre-planning discussions. All units meet London Plan space standards, and the layout appropriately minimises the proportion of single-aspect units, none of which are north-facing. However, the applicant should provide further information regarding how the single-aspect units will be designed so as to mitigate overheating and allow for sufficient ventilation, particularly those with a south-facing aspect. The applicant should also note comments made in paragraph 58 of this report regards to energy efficiency and the need to address London Plan policies in relation to overheating.

Children's play space and amenity

37 London Plan Policy 3.6 seeks to ensure that development proposals include suitable provision for play and recreation. Further detail is provided in the Mayor's Shaping Neighbourhoods: Play and Informal Recreation Supplementary Planning Guidance. Using the methodology within the Mayor's SPG, the applicant has calculated that the child population of the development will be 207; 56 of which are expected to be under five years old. In accordance with the Mayor's SPG, the development will need to provide, as a minimum, 10 sq.m. of door-stop play provision for every child under-five, and identify facilities for older children.

38 Within the development, a series of spaces are proposed, which are intended to provide play opportunities, in addition to general residential amenity, with approximately 4,000 sq.m. currently identified. Within the two lower blocks, where the affordable element is provided, an external podium terrace fronted by two internal play and amenity rooms, in addition to upper terraces of external space, is provided. Within the tower element, an external podium terrace fronted by amenity rooms which comprise the entire of the first floor, in addition to upper terraces of external amenity space and associated internal amenity rooms, is provided. Whilst the use of internal play and residents rooms within the development can play a role in residential amenity and play space provision, the need to maximise the delivery of outside space is critical, particularly in light of the density of the proposed development. The applicant has responded positively to comments made at pre-planning application stage and ensured that the internal rooms directly adjoin external spaces, which is strongly supported, and will significantly encourage their use. The applicant has also increased the size of the spaces provided, which is also strongly supported.

39 In addition to private amenity space, the applicant has responded positively in pre-planning application discussions, and has sought to maximise public open space provision, which is seen as critical to mitigate this scale of development. A dockside area of open space is included, providing key opportunities for people to sit and enjoy the historic dock setting, which is strongly supported. The community space will also provide additional recreation opportunities, particularly for older children, and is a welcome addition.

40 Overall the proposal responds positively to London Plan policy requirements regarding children's play space and residential amenity, and the overall range of spaces and their indicative designs, are supported.

Urban design

41 Good design is central to all objectives of the London Plan. The scheme proposes a 45-storey tower, with two linked fifteen-storey elements. Given the scale of development, its design needs to be of an outstanding quality. The proposal has been discussed extensively at pre-planning application stage, and the applicant has been forthcoming in evolving its design in response to officer's recommendations, which is welcomed.

Layout

42 The approach of retaining and enhancing the east-west route across the site is strongly supported, as it connects Tiller Road, Pepper Street and Glengall Grove, forming a strategic east-west route across the whole of the Isle of Dogs. The proposal was significantly changed through the pre-planning application process, and the southern tower moved to allow this route to be approximately twelve metres wide, and open to the sky. This amendment is particularly supported, making the route more legible and inviting than the previous design where buildings were overhanging this important link.

43 The quality and sense of safety of this route is subject to the levels of activity and overlooking the uses flanking it provide. Whilst the entrances to the residential buildings and retail units will contribute towards generating good levels of activity, the way the community space is used, and its boundary treatment, will also be a critical aspect to this. The applicant needs to ensure this is optimised to guarantee the quality and safety of the route, and further information on how this will be achieved needs to be provided. Whilst the provision of community facilities is strongly supported, as set out in paragraphs 20 to 22, given the importance of activating this route, an alternative 'fallback' scenario where this space is used to provide additional retail or commercial uses may also be considered acceptable, and should be investigated.

44 The provision of two public open spaces at either end of the proposed route is welcomed. These help articulate the importance of the link, as well as providing valuable open space for the wider community.

45 In response to GLA officer comments, the western space is now well-shaped and landscaped to ensure the route is prominent from Marsh Wall, in particular when approached from the south, where significant new development is likely to take place. Retail units are located facing this space to ensure it feels active and well-used, and the change in levels between Millharbour and the site have been carefully landscaped so that the space feels like an extension to the Millharbour public realm, which is strongly supported. The amendments made during pre-planning discussions to the entrance level of the retail unit on Millharbour are also welcomed, ensuring this reflects the hierarchy of routes and spaces around the development, and helps to retain the importance of Millharbour as the main public realm spine through the area.

46 The eastern space is set away from Millharbour on the dockside, providing a soft landscaped and more intimate space. It is larger in size, but still benefits from activity generated from surrounding retail uses, ensuring it feels safe and inviting, which is welcomed.

Residential quality

47 The residential quality of the scheme has been improved significantly through pre-planning application discussions. The most welcomed of these changes has been a significant reduction to the floorplate of the southern tower. This has allowed no more than eight units to be served from a single core, 50% of the units to be dual-aspect, and no north-facing single-aspect units. However, given that a small number of south-facing single-aspect units are provided, the applicant needs to show how these units will be designed so as to mitigate overheating, and allow for sufficient ventilation. The applicant should also note comments made in paragraph 58 of this report regards to energy efficiency and the need to address London Plan policies in relation to overheating.

48 The provision of private amenity space in the form of winter gardens, communal terraces and internal amenity and play rooms, is welcomed. Changes to the scheme secured during pre-planning application stage have increased the size of the podium terrace, and dedicated significantly more internal space to amenity that spills into external terraces, which is particularly welcomed, providing significant external space for residents.

49 The residential quality of the two northern buildings is also high, with the only single-aspect units facing east or west, which is welcomed. The provision of the large amenity space on podium level will provide a useful external space for residents and the changes secured to the floor facing this space ensures that residential units are not compromised, and the space is welcoming to all. The increase in size of this space as requested at pre-application stage is also strongly supported.

Architectural treatment

50 The architectural approach is generally welcomed. The changes to the tower's footprint secured at pre-application stage creates an elegant profile, and the simple brick framed elevations further emphasise this, which is welcomed. The expression of the communal terraces provides the scheme with a subtly distinctive characteristic, which is also supported. However, given the importance of detailing and quality of materials to the final appearance of the scheme the applicant is strongly advised to retain the same architects through to construction stage, and the Council is encouraged to scrutinise these elements fully.

Height and strategic views

51 The tallest element of the development rises up to 45-storeys (150 metres) in height, with the two lower elements rising to 15 storeys (56 metres). The two lower elements create a shoulder height to the development, which is generally in keeping with the emerging context along Millharbour, and is welcomed in principle. At 150 metres high, the tallest element is significantly taller than the contextual height of the area, making it very prominent in local views, as illustrated in the applicant's townscape assessment, and visible in London View Management Framework protected views, as assessed below. However, given the benefits of landmarking the intersection between Millharbour, the dock, and the only contiguous east-west route across this part of the Isle of Dogs, the negligible harm that the height of the tower creates, and the high quality of the scheme's design, officers consider this height to be acceptable.

52 As set out in paragraph nine of this report, the buildings lies in a number of strategic views, as identified in the Mayor's London View Management Framework. The applicant has submitted a townscape, visual and built heritage impact assessment, which only assesses the development's impact on three of these views, namely 5A.1, 6A.1 and 11.B, in addition to an assessment from Royal Naval College World Heritage Site. Whilst it is acknowledged that the proposed building largely sits within an existing and emerging cluster in the wider strategic views, it is nonetheless important to fully assess the proposal's impact. The applicant should therefore provide a more detailed townscape assessment demonstrating the proposal's impact on all of the views listed in paragraph nine. In the absence of this more detailed assessment, it is not possible at this stage to determine whether the proposal fully accords within London Plan Policy 7.12.

Blue Ribbon Network

53 The eastern section of the application site sits adjacent to Millwall Inner Dock, which forms part of the Blue Ribbon Network. London Plan policies acknowledge the important role that London's waterbodies have in promoting water-related uses, as well as providing important habitats, landscapes and views. The proposal includes an area of public open space located immediately adjacent to the dock, providing a new dockside space where residents and the wider community can sit and appreciate the dock setting. This is strongly supported in accordance with London Plan Blue Ribbon Network policies. Whilst the provision of a cafe/restaurant unit fronting this space is supported, as discussed with the applicant during the pre-planning application stage, it is critical that this use does not dominate the open space, which should be prioritised for public use. This requirement should be secured by the Council as part of any future planning permission.

Inclusive design

54 In accordance with London Plan Policy 3.8, the applicant has confirmed that all of the residential units will meet Lifetime Homes standards. The applicant has also stated that 10% of the units will be capable of easy adaptation for wheelchair users. Whilst this is supported in principle, it is not clear how these units will be distributed across tenures and unit size. The applicant should engage with the Council to identify local requirements for affordable wheelchair provision, and ensure an equitable distribution across all tenures.

Climate change - adaptation

55 In accordance with London Plan Policy 5.3, the applicant should provide an assessment that demonstrates that the proposal meets at least the Mayor's priority standards set out in the Mayor's Sustainable Design and Construction Supplementary Planning Guidance, and where possible the Mayor's best practice standards. At present, a BREEAM assessment has been provided, but not an assessment against London Plan and borough standards. Given the scale of the development, the applicant should also engaged with the Council's waste team regarding waste management, and should include further details on how recycling will be managed and actively promoted in accordance with the Code for Sustainable Homes.

Climate change - mitigation

56 Whilst the applicant has broadly followed the London Plan energy hierarchy to reduce carbon dioxide emissions, it is not possible to determine at this stage whether the proposal accords with London Plan energy policies. Further revisions and additional information, as set out in detail below, should therefore be submitted before the strategy can be assessed, and compliance with the London Plan, verified.

Energy efficiency

57 A range of passive design features and demand reduction measures are proposed to reduce the carbon emissions of the proposed development. Both air permeability and heat loss parameters will be improved beyond the minimum backstop values required by building regulations. Other features include mechanical ventilation with heat recovery, low energy lighting, and reduced thermal bridging. Further information should be provided on the approach proposed to ensuring that the thermal bridges will be reduced to the levels used in the modelling.

58 The demand for cooling will be minimised through solar control glazing. An overheating assessment has been carried out for some sample units, which suggests that with a glazing G-value of 0.6, the dwellings are not at risk of overheating. The applicant has stated that the assessment has been carried out considering future climate, but has not specified how this has been achieved. Further information should be provided on the weather tapes used for the modelling, and their source. It is recommended that TM49 is used, as this also considers the urban heat island effect, which affects urban developments.

59 The applicant should commit to meeting Part L 2013 by energy efficiency measure alone, and provide the carbon emissions and savings for this step of the London Plan hierarchy, including sample DER and TER sheets, and BRUKL sheets.

District heating and renewables

60 The applicant is liaising with the operators of the Barkentine district heating network, which is located within the vicinity of the development, to investigate a potential connection. Connection to the network should continue to be prioritised, and evidence of correspondence with the network operator, and the Council, confirming capacity availability and timescales for connection, should be submitted.

61 The applicant is proposing a site-wide heat-network. Confirmation is required that the network will link all residential units and all land-uses, served from a single-energy centre. A plan illustrating the route of the proposed network, in addition to the size and location of the energy centre, should be provided. At this stage, and in the absence of evidence that a connection with Barkentine district heating network is not possible, the inclusion of CHP cannot be supported. If, having exhausted district heating options, on-site CHP is proposed, further information should be provided on the proposed

installed capacity and efficiency of the system, and the proposed management arrangements. The carbon savings associated with both a district heating approach, and on-site CHP, should be provided.

62 The applicant has investigated the feasibility of a range of renewable energy technologies and is proposing to install solar photovoltaic panels on the roof of the buildings. The carbon savings associated with the proposed installation should be provided.

Transport

Car and cycle provision

63 The development will provide 93 car parking spaces, with an additional 11 spaces as Blue Badge only, equating to a parking provision of 0.21 spaces per unit, which is acceptable. However, the Blue Badge provision should be increased so that each wheelchair accessible unit is allocated a Blue Badge bay, in accordance with the London Plan Housing Supplementary Planning Guidance. Furthermore, 20% of all spaces should be fitted with active electrical vehicle charging points, with a further 20% fitted with passive provision, in line with London Plan Policy 6.13.

64 Cycle parking is proposed in line with the Further Alterations to the London Plan, which is welcomed. However, the applicant should confirm the provision of shower and changing facilities for all staff employed on site.

65 To mitigate the cumulative impact of development on the Cycle Hire network in this part of the Isle of Dogs, a contribution of £70,000 towards the provision of additional cycle hire capacity within the site's locality is required, in accordance with London Plan Policy 6.9.

66 Pepper Street is proposed to be widened to provide a 10.7 metre wide 'multi-use' street, with existing vehicular barriers removed. The route will be informally separated into two pedestrian footways, either side of a vehicular carriageway, and a bi-directional cycle route. Whilst the principle is supported by TfL, the design of this route should be amended to convey greater priority for cyclists over other modes of traffic. The applicant should refer to chapter four of the London Cycle Design Standards for guidance.

Transport impact

67 The applicant's trip generation methodology is acceptable. However, the level of demand for DLR trips indicates that Crossharbour DLR station will already be operating over capacity when the development opens. Furthermore, the capacity of the existing swing bridge across the South Quay dock connecting this area to Canary Wharf is expected to be severely constrained in the future. TfL has identified that the provision of additional dock crossing points and station improvements at Crossharbour will assist in mitigating the cumulative impact of development on the local DLR network.

68 On this basis, and in accordance with London Plan policies 6.1, 6.4, 6.7, 6.9 and 6.10, two contributions are sought. Firstly, £130,000 towards the £1.6 million cost of delivering Crossharbour capacity improvements, and secondly a contribution towards the provision of additional dock crossing points comparable to those sums secured from other Isle of Dogs developments. TfL has also identified bus capacity constraints at this location during the peak hours, and therefore a contribution of £200,000 to mitigate the cumulative demand for bus travel is also required, in accordance with London Plan Policy 6.2.

69 The applicant has undertaken a pedestrian environment review system (PERS) audit, which is welcomed. However, the audit should include an assessment of two nearest bus stops to ensure they meet TfL's accessibility guidelines. The audit did nonetheless identify a lack of wayfinding, and accordingly TfL requests a contribution of £15,000 towards the delivery of Legible London signage in accordance with London Plan Policy 6.10.

Travel planning

70 Servicing will occur via a combination of both on-street, and off-street, arrangements, which is acceptable. A delivery and servicing plan, and framework construction logistics plan, have been prepared, which is welcomed. The final documents should be secured by condition in accordance with London Plan Policy 6.14.

71 The applicant has submitted a framework travel plan, which refers to both the residential and retail elements of the scheme, the contents of which are acceptable. On that basis, the final travel plans should be secured, enforced, monitored and reviewed as part of the section 106 agreement to ensure conformity with London Plan Policy 6.3.

Community Infrastructure Levy

72 In accordance with London Plan Policy 8.3, the Mayor commenced CIL charging for developments permitted on or after 1 April 2012. The proposed development is within the London Borough of Tower Hamlets, where the Mayoral charge is £35 per square metre Gross Internal Area (GIA).

Local planning authority's position

73 The Council has yet to consider a report on this application at its planning committee.

Legal considerations

74 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

75 There are no financial considerations at this stage.

Conclusion

76 London Plan policies on housing, urban design, inclusive design, climate change, and transport are relevant to this application. Whilst the principle of the housing-led redevelopment of this site is supported, a number of strategic concerns are raised, and consequently the application does not accord with London Plan Policy. The following could address these deficiencies:

- **Principle of development:** the principle of the development is strongly supported in accordance with London Plan policies 2.13 and 3.3. In accordance with the draft Further Alterations to the London Plan, and Policy 3.16, it is essential that the proposed community facility is appropriately secured.
- **Housing:** it is not possible at this stage to determine whether the proposal provides the maximum reasonable amount of affordable housing, in accordance with London Plan Policy 3.12. Further information is also required regarding residential quality in relation to the single-aspect units, in accordance with the Mayor's Housing SPG, and London Plan policies with regards to overheating.
- **Urban design:** in the absence of a detailed assessment of the application within all relevant strategic views, it is not possible at this stage to determine whether the proposal fully accords within London Plan Policy 7.12. Further information is also required regarding the design of the community facility, with the view to securing a quality and well-activated Pepper Street.
- **Inclusive design:** whilst the applicant has stated that 10% of units will be easily adaptable for wheelchair users, in accordance with London Plan Policy 3.8, it is not clear at this stage whether this provision is appropriately distributed across tenures.
- **Climate change adaptation:** in accordance with London Plan Policy 5.3, the applicant should submit a sustainability statement demonstrating that the proposal meets at least the Mayor's priority standards set out in the Mayor's Sustainable Design and Construction Supplementary Planning Guidance, and where possible the Mayor's best practice standards. This should include specific waste management measures to ensure recycling will be managed and actively promoted.
- **Climate change mitigation:** the energy strategy does not accord with London Plan policies 5.2, 5.6, 5.7 and 5.9. Further information regarding the proposed thermal bridging and overheating modelling is required, and further savings should be sought through energy efficiency measures alone. Connection to Barkentine heat network should be prioritised, and appropriately secured by the Council. If, having exhausted district heating options, on-site CHP is proposed, further information should be provided on the proposed installed capacity and efficiency of the system, and the proposed management arrangements. Finally, the carbon savings at each stage of the London Plan hierarchy should be submitted.
- **Transport:** a number of alterations to the scheme have been requested, including transferring a number of the proposed parking spaces to Blue Badge only spaces, and ensuring the design of Pepper Street encourages cyclists. Contributions towards delivering additional capacity and improvements to the DLR, dock crossing points, bus provision, cycle hire network, and legibility, are also required.

for further information, contact GLA Planning Unit (Development & Projects team):

Colin Wilson, Senior Manager – Development & Projects

020 7983 4783 email colin.wilson@london.gov.uk

Justin Carr, Strategic Planning Manager (Development Decisions)

020 7983 4895 email justin.carr@london.gov.uk

Sarah Considine, Principal Strategic Planner, case officer

020 7983 5751 email sarah.considine@london.gov.uk
