Strategic planning application stage 1 referral


The proposal

Part outline, part detailed application for the redevelopment of the site to provide 950 residential units, nursery, doctor’s surgery, community uses (D1), retail, restaurants/cafe (A1/A3), bus layover and driver facilities, 388 car parking spaces, cycle hub, landscaping and ancillary works.

The applicant

The applicant is Meyer Homes, and the architect is JTP Architects.

Strategic issues

Land use: residential led mixed use redevelopment of this long standing derelict site adjacent to Tolworth district centre and Tolworth rail station is strongly supported. (paragraphs 22-25)

Affordable housing: 13.16% is not acceptable. Discussion between all parties on the proposed affordable housing offer including the quantum, the proposed products, their affordability, the phasing and a review mechanism are required. (paragraphs 26-30)

Transport: the traffic generation and congestion issues need to be addressed through S106 mitigation. (paragraphs 56-71)

Recommendation

That Kingston Council be advised that while the application is generally acceptable in strategic planning terms the application does not comply with the London Plan, for the reasons set out in paragraph 75 of this report.

Context

1 On 13 January 2017 the Mayor of London received documents from Kingston 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 20 February 2017 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.
The application is referable under Categories 1A and 1C of the Schedule to the Order 2008:

- Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats.
- Development which comprises or includes the erection of a building more than 30 metres high and is outside of the City of London.

Once Kingston 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.

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

Site description

The site measures 7.61 hectares and sits within the Royal Borough of Kingston. The land is currently vacant and has been for over a decade. It lies to the south of Tolworth district centre at the junction of the A3 Kingston Bypass and A240 Kingston Road. The site once included a public house and Ministry of Defence buildings (now demolished) and sits adjacent to the Charrington Bowl building which remains and is outside the application boundary.

The area to the west of the site is characterised by residential development predominately in the form of two storey semi-detached properties. Pedestrian access linking the proposal to the district centre and surrounding residential areas is via a network of subways and a pedestrian footbridge over the A3.

The proposed development site is currently a vacant brownfield site and is bound to the north by Toby Way and existing residential properties (with the A240 Kingston Road beyond), Hook Rise South (with the A3 Kingston Bypass beyond) to the west, existing residential properties to the south, and the Chessington Branch railway line to the east.

The A240 Kingston Road, which forms part of the Transport for London Road Network (TLRN), and Hook Rise South both connect to the A3 Kingston Bypass, which is also part of the TLRN, via the Tolworth Interchange at the north eastern corner of the site. The A240 Broadway on the north-western arm of the Tolworth Interchange forms part of the Strategic Road Network (SRN).

The site is directly served by three bus routes on the A240 Kingston Road (406, 418 and K2) and a further three routes are available on The Broadway (281, 265 and K1). Tolworth railway station is adjacent to the site at its south-eastern corner and has two train services per hour in each direction on the Waterloo to Chessington line. The site therefore has a Public Transport Accessibility Level (PTAL) rating of 2 across the majority of the site, increasing to 3 in the north east corner closest to Kingston Road and Tolworth Station (on a scale of 1 to 6b, where 6b is the most accessible). Tolworth station has been identified as a possible Crossrail 2 station.

Details of the proposal

Permission is sought for hybrid planning permission. For a part outline, part detailed application comprising the redevelopment of the site to provide 950 residential units, a nursery,
doctor’s surgery, community uses (D1), retail floorspace, restaurants/cafe (A1/A3), bus layover and driver facilities, 539 car parking spaces, cycle hub, landscaping and ancillary works.

11 The detailed part of the application will deliver:

- 211 residential units
- D1 children’s nursery (169 sq.m.)
- 122 sq.m. of community floorspace
- A coffee kiosk (43 sq.m.)
- 60 car parking spaces and 381 cycle spaces
- Space for the new bus station and bus driver facilities

12 The outline part of the application will deliver:

- 739 residential units
- 308 sq.m of retail floorspace
- A doctor’s surgery (302 sq.m.)
- Site management office (75 sq.m.)
- Energy centre
- 328 car parking space sand 1, 209 cycle spaces

13 A proposed phasing plan is shown below. The detailed part of the application is shown in red as phase one.

![Proposed phasing from the Planning Statement appendix 2.](image)

**Case history**
The site has been subject to several development proposals since 2006 when the site was acquired by Tesco, the majority of which were withdrawn before determination. The last proposal (D&P reference 2268b/LPA reference 15/10074) was refused by Kingston Council in July 2016.

The proposal was for an outline application for buildings ranging in height from 3 to 10-storeys comprising 705 residential dwellings and 1,625 sq.m. of Use Class A1/A3/D1/D2 and B1 floorspace including a convenience store, doctor’s surgery and day nursery with associated bus interchange.

Kingston Council resolved to refused the application for two reasons:

- The proposed development by reason of the scale and density required to deliver 705 units, would be out of keeping with character and appearance of the surrounding area. The development would thereby conflict with Policies DM10, SN1 and T1 of the Core Strategy.

- Insufficient evidence has been submitted to demonstrate that the development would not have an adverse impact on the local highway network or local on street parking conditions. The development would thereby conflict with Policy DM09 of the Core Strategy.

On 25 July 2016 the Mayor advised Kingston Council that “given the recent approval of the Tolworth Tower application and the sites proximity to the station, the A3 and the district centre the scale and density of the proposal is not out of keeping with area. Moreover it does not meet London Plan policy in terms of optimising the development of residential sites and intensifying development in highly accessible locations close to town centres. The development would also miss the opportunity to realise the growth potential of the Crossrail 2 project and the provision of affordable housing”.

The applicant has appealed the Council’s decision and a date for the public enquiry has been set for April 2017. However on 3 February 2017, following legal counsel, the Council withdrew its reasons for refusal.

**Strategic planning issues and relevant policies and guidance**

The relevant issues and corresponding policies are as follows:

- **Mix of uses**  
  London Plan

- **Retail/town centre uses**  
  London Plan; Town Centres SPG

- **Affordable Housing**  
  London Plan; Housing SPG; draft Affordable Housing and Viability SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG; Shaping Neighbourhoods: Character and Context SPG

- **Density**  
  London Plan; Housing SPG;

- **Urban design**  
  London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG

- **Inclusive access**  
  London Plan; Accessible London: achieving an inclusive environment SPG;

- **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
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 Kingston Council Core Strategy DPD and the London Plan (consolidated with alterations since 2011).

The following are also relevant material considerations:
- Tolworth Regeneration Strategy 2010

**Principle of development**

The principle of a mixed use residential led development was supported by the Mayor in the previous application reference D&P2268b.

Given the site’s location just south of the Tolworth district centre and adjacent to the Tolworth rail station (which has been identified as a proposed Crossrail 2 station) London Plan policies 2.15 and 2.7 are relevant. These policies seeks to direct development and intensification, including high density housing to London’s network of town centres and other areas of good public transport accessibility.

In addition the Royal Borough of Kingston Direction of Travel adopted in October 2016 by both the Council and the Mayor identifies Tolworth as an emerging opportunity area. As such policy 2.13 of the London Plan which seeks proposals within opportunity areas to optimise residential and non-residential development is also relevant. The provision of residential units as part of the redevelopment is also supported by London Plan policies 3.3, 3.4 and 3.7.

The provision of the doctor’s surgery, children’s nursery and community floorspace to support the increase in residents and is also welcomed and supported by policies 3.16 and 3.17 of the London Plan.

**Housing**

**Affordable housing**

London Plan policy 3.11 and 3.12 requires the maximum reasonable amount of affordable housing to be delivered in private residential and mixed-use schemes. Further guidance is provided in the Mayor’s draft Affordable Housing and Viability SPG.

London Plan policy 3.12 is supported by paragraph 3.71, which urges borough councils to take account of economic viability when estimating the appropriate amount of affordable provision. Paragraph 3.75 highlights the potential need for re-appraising the viability of schemes prior to implementation in order to take account of economic uncertainties and ensure that maximum public benefit is secured over the period of the development.

The applicant has provided a financial viability report which asserts that (as with the previously refused scheme) 13.16% (approximately 125 units) is the maximum reasonable amount of affordable housing the scheme can provide. This position was previously accepted by the Council following an independent review however GLA report on the scheme D&P/2268/02 states that “whilst the principle of a review mechanism is strongly supported GLA officers are not
convinced that the proposed offer of 13% reflects the improving viability for housing developments in London. Officers are also keen to explore how an increase in scale and density would affect the affordable housing offer”. The Council’s independent assessment for this new scheme is not yet completed and the Council has not confirmed its support of the current 13.16% offer.

29 No details have been provided on the proposed affordable products or their affordability. GLA officers are still concerned that this scheme for 950 units (an additional 245 units) does not increase the viability of the development or the percentage of affordable units. Especially given the removal of the taller buildings which general carry higher construction costs and the improving housing market. It is also noted that the applicant is not proposing to provide any affordable housing in the first phase, the detailed part of the application. Although it is acknowledged that there will be significant initial costs associated with the development.

30 Once the Council’s independent assessment has been submitted for review by GLA officer’s further discussion between all parties on the proposed affordable housing offer including the quantum, the proposed products, their affordability, the phasing and a review mechanism will be needed to ensure the proposal provides the maximum reasonable amount of affordable housing to comply with the London Plan. In addition to affordable housing provision the applicant is also being asked to make financial contributions to MCIL, RBK CIL and TfL.

Housing choice

31 London Plan Policy 3.8 seeks a balanced mix of unit sizes in new developments. The Mayor’s Housing SPG states that higher density developments are particularly suitable to town centres and edge of centre locations and acknowledges that these developments will be more suitable for households without children which require less amenity and child play space. This is reflected in the proposed breakdown of unit size is shown below and given the location of the site the quantum of family sized units is acceptable.

32 However, the applicant has not provided details on the mix of unit sizes in relation to tenure. This will need to be submitted for assessment before the application is referred back to the Mayor. Officers would expect to see a large proportion of the family units allocated as affordable units.

<table>
<thead>
<tr>
<th>No. units</th>
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<tbody>
<tr>
<td>1-bed</td>
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</tr>
<tr>
<td></td>
<td>39.5%</td>
</tr>
<tr>
<td>2-bed</td>
<td>377</td>
</tr>
<tr>
<td></td>
<td>40.4%</td>
</tr>
<tr>
<td>3-bed</td>
<td>197</td>
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<tr>
<td></td>
<td>950</td>
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</tbody>
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Children’s play space

33 Policy 3.6 of the London Plan sets out that “development proposals that include housing should make provision for play and informal recreation, based on the expected child population generated by the scheme and an assessment of future needs.” The applicant has provided a plan on page 122 of the design and access statement highlighting 2 formal designated play areas measuring 123 sq.m. and 2,592 sq.m. of general amenity space where informal play space could take place within the general amenity spaces. This is not sufficient to satisfy compliance with
London plan policy 3.6 or the Mayor’s supplementary planning guidance ‘Shaping Neighbourhoods: Play and Informal Recreation SPG.

34 As a minimum the applicant must provide 610 sq.m. of designated child play space to meet the needs of the estimated 61 children under the age of 5. The amenity and play space strategy contained within the design and access statement identifies neighbouring play facilities within 400 and 800 metres of the site to meet the needs of children aged 5-12 and 12 years and over. Kingston Council will need to determine whether financial contributions are required to improve these facilities to accommodate the extra children from this development.

Density

35 Policy 3.4 of the London Plan seeks to optimise housing potential. The density range set out in table 3.2 of the London Plan for urban sites in this location is between 200 and 450 habitable rooms per hectare or 45-170 units per hectare. However the supporting text for the policy makes clear that the table should not be applied mechanistically. It is only the start of planning housing development and account should be taken of factors relevant to optimising potential including local context, design and transport capacity as well as open space and social infrastructure.

36 It should also be noted that London Plan paragraph 2.62 states that with regard to opportunity areas the scope for larger areas to determine their own character should be fully realised in terms of densities, including those towards the top of the relevant density scale where appropriate.

37 The proposal has a residential density of 607 habitable rooms per hectare or 216 units per hectare which is partly due to the concentration of 1 and 2 bed units. The density reflects the advice given to the applicant in report D&P/2268b/02 and pre-application report D&P/2268c/01 where officers states that given the sites location adjacent to a district centre and the Tolworth rail station a higher density could be achieved. As detailed in the design section below the site does not demonstrate any of the usual signs of overdevelopment. As such the proposed density is supported.

Urban design

38 Good design is central to all objectives of the London Plan, and given the scale of development proposed, its design needs to be of an outstanding quality. The proposed development has been subject to a number of pre-application discussions.

39 The proposals seek to rationalise the masterplan of the previous scheme, with a key benefit being an enlarged public square at the heart of the scheme and a simplified sequence of public spaces.

40 The masterplan layout is broadly supported with a simple arrangement of mansion blocks flanking a residential street running east-west through the site. As discussed during the pre application meeting, the applicant has worked to improve the pedestrian environment along the traffic dominated A3, with a series of openings and links along the site’s northern boundary. A series of sections are provided which indicate an appropriate balance of buffering from the A3, with the proximity and staggered arrangement of blocks helping to optimise passive surveillance, promoting safety and security for pedestrians. The two entrance boulevards connecting Hook Rise South with the scheme’s main east/west street also offer permeability and a consistency of streetscape that has potential to successfully integrate the Hook Rise South route into the wider scheme.
41 The intention to increase the overall density using an efficient mansion block typology is strongly supported and this approach has potential to create a strong residential character, with consistent lengths of active frontage across the masterplan area. The infilling of blocks along the southern edge of the east/west link is particularly successful in forming a consistent run of front door entrances to support street-based activity, while also defining areas of private amenity space to the rear of blocks.

42 As part of the emerging landscaping and public realm strategy, the applicant should demonstrate how a consistent sequence of pedestrian routes can be extended beyond the red line boundary, to form legible and pedestrian friendly connections to the station and town centre. Particular focus should be given to prioritising pedestrian movement from the town centre, including crossing points to Toby Way.

43 Further detail is provided on the pedestrian connection and public realm on the approach to the station hub/bus interchange. This shows minimum pavement widths of 3 metres which is welcomed. The wedge shaped building also has potential to further define the route towards station entrance with active frontage.

44 In terms of Tolworth Square, the formal public realm layout is supported for the square itself; however there is no detail on how a safe and legible pedestrian route will be secured to link the square with a desire line via Toby Way and towards the town centre. Further detail is needed to show how the Tolworth Square public realm strategy can be extended to address this, including options for including a pedestrian crossing towards the northern end of Toby Way (as indicated on p.93 of the DAS). The pavement width at the northeast corner of block D3 also appears limited and should be widened where feasible to avoid a pinch-point at this prominent corner.

45 The proposed wedge-shaped footprint of the prominent building at the roundabout improves on the previous scheme, with increased width to the footway and a zone of public realm between the two building elements to provide a degree of shelter from the traffic dominated environment. The initial visuals of this block suggest a heavily glazed appearance which would be at odds with the predominant brickwork of the wider scheme. Given the visual prominence of this building, officers would encourage a more ambitious architectural intent, to create a distinctive and exemplary building that acts as a landmark to the wider masterplan area.

46 Page 202 of the design and access statement gives limited information on the appearance and architectural intent of the feature buildings and more clarity is needed on their form and architecture to ensure an exemplary design quality is secured as part of the outline element.

47 Residential quality appears high across the scheme, with simple and efficient layouts and core to unit ratios within the larger mansion blocks and a relatively high proportion of dual aspect. The inclusion of through units to avoid single aspect north facing units is welcomed. All ground floor units should be designed to enable direct front door access to the street the applicant should confirm that duplex units within the larger C-shaped blocks will have direct access to courtyards at podium level. All units should achieve a minimum of 2,500mm floor to ceiling heights to optimise daylight/sunlight penetration.

48 The form and massing approach is broadly supported and creates a consistent human-scaled development across the site, while optimising residential density. As discussed, the simple sequence of public spaces running through the site links the defined character areas, which in tandem with subtle articulation and variations of facing materials could assist in way-finding while providing residents with a sense of ownership and belonging.

Inclusive access
The applicant’s design and access statement demonstrates that the principles of inclusive access have been incorporated throughout the proposal. The applicant has confirmed that 90% of the homes will be built to meet building regulations M4(2) ‘accessible and adaptable dwellings’ and 10% of the homes will be designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users to meet building regulation M4(3) ‘wheelchair user dwellings’. Plans detailing the layout of these units have also been submitted.

**Sustainable development**

**Energy**

50 The applicant has followed the energy hierarchy set out in policy 5.6 of the London Plan and sufficient information has been provided to understand the proposal as a whole. However the following issues need to be addressed before the application is referred back to the Mayor.

**Energy efficient standards**

51 The overheating analysis and thermal dynamic modelling demonstrates that a number of spaces do not comply with the CIBSE TM52 criteria for overheating. Further design measures will need to be investigated.

**District heating**

52 The energy centre drawings submitted do not reflect the proposed energy strategy. The strategy states the development will be served by a single energy centre within phase 2. However the energy centre drawings show two separate energy centres and CHPs. The drawings should be amended to reflect the strategy.

**Combined heat and power**

53 The distribution losses assumed for the site-wide network are 5%. The applicant should explain the procedures proposed to keep the network losses to a minimum.

**Renewable energy technologies**

54 The savings associated with the ‘be green’ scenario are considered high for the proposed PV installation; the applicant should revisit the assumptions and calculations to confirm they are correct.

**Transport for London**

**Strategic issues**

55 The previous application for 705 residential units included the same number of residential car parking spaces (356) as this application for 950 residential units. Whilst the previous application resulted in some increases in traffic, the impact from the proposed development with appropriate mitigation was acceptable, subject to the applicant having regard to cumulative impacts of development. Since the previous application was determined the council have approved a substantial new office development which would be the UK Head Office for Lidl (15/10383) on Jubilee Way with 311 car parking spaces. TfL has now produced a traffic model which assesses the cumulative impact on the strategic highway network of this development and the Lidl scheme with 311 car parking spaces. This model has been provided to the developer.
Car parking

56 It is proposed to provide a maximum of 356 car parking spaces for the residential element of the development, which equates to 0.37 spaces per unit. Given the traffic and congestion issues identified above this would be the maximum provision. Electric Vehicle Charging Points (EVCP) including passive provision will be provided in accordance with the London Plan. There will be an additional 9 spaces for the non-residential elements of the development and 8 car club spaces. In addition, 15 off-site visitor parking spaces are proposed along Hook Rise South. The TA states that 10% of all residential parking spaces will be blue badge accessible which would equate to 36 spaces. London Plan policy 8.3 requires 10 per cent of new housing to be designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users. Furthermore, the Housing SPG (November 2012) states that each wheelchair accessible unit should have an associated accessible parking space, this would equate to a disabled parking requirement of 95 spaces. The parking strategy and management plan should therefore facilitate the allocation of one blue badge car parking space per occupied wheelchair accessible unit.

57 The applicant’s proposal for the s106 agreement to include a contribution to undertake a CPZ study and implementation is strongly supported. TfL urges the council to agree to take this forward given the traffic and congestion issues identified. The legal agreement should also include a mechanism whereby future residents are prevented from applying for parking permits within an extended CPZ.

58 Measures detailed within the Residential Parking Strategy and Management Plan should be secured through the s106 agreement. TfL should be consulted on the final version of the Strategy and Plan to assist in managing traffic flows.

59 The applicant has also agreed to provide three year’s free car club membership for all new residents which should be secured in the section 106 agreement.

Highway Impact

60 TfL have assessed the traffic impacts of the proposed development in combination with the recently approved Lidl HQ using TfL’s Tolworth area VISSIM model in both weekday peak periods. Whilst the results indicate unacceptable journey time and queue length impacts on the strategic network in both peak periods; TfL are currently in the process of developing a strategic highways solution which would mitigate the cumulative impacts of both developments and improve pedestrian and cycle linkages to the town centre and station. Changes to the boundary along the Kingston Road and a financial contribution towards the strategic highway solution are therefore required. A commitment to this will need to be submitted by the applicant before the application is referred back to the Mayor.

61 The applicant will need to enter into a s278 agreement with TfL for highway works on TfL’s highway associated with the development.

Buses

62 A £300,000 bus contribution (£60k x 5 years) is sought to provide one additional single bus journey in the AM peak hour. £582,250 is also required to extend the 281 bus service. These contributions must be secured through the section 106 agreement. The total cost to extend the 281 bus service to Lansdowne Close is £1,182,250 (£236,450 pa for 5 years). As part of planning application (15/10383) Lidl have agreed to contribute £600,000 towards the cost of this extension.
In addition, bus infrastructure costs of £225,096 are required. This comprises £4,486 to relocate the bus stop and shelter on Ewell Road, £20,610 for new stops, shelters and stands at Lansdowne Close and £200,000 for the bus driver facility (unless agreement be reached with Network Rail for drivers to access the Toilets within Tolworth Station).

TfL expect the applicant to review the revised facility by way of a stage 1 safety audit, which should be secured by condition. Furthermore, the detailed design of the bus interchange will need to be agreed with TfL.

The applicant has confirmed that all sections of highway along the proposed extension to route 281 will be adopted highway therefore there is no requirement to enter into a licence agreement with TfL.

The forecast rail trips are unlikely to have a significant impact on the operation of the rail network. Tolworth station sits on the southern boundary of the site. When the detailed design work for the outline parts of the application is undertaken the applicant should enter into discussion with TfL and Network Rail to ensure the development integrates with the station and responds to any future proposals to improve the station and surrounding, for example through Crossrail 2.

The applicant has confirmed the cycle parking for all elements of the development will be provided in accordance with the London Plan minimum standards.

The applicant has agreed to contribute towards funding for a new cycle hub to be located near the rail station. The contribution proposed will need to be clarified before the application is referred back to the Mayor.

The proposed development will see an increase in pedestrian and cycle trips to/from the site and the local area. The internal access roads within the site will provide suitable pedestrian and cycle links through the site and to the station. A 3 metre-wide shared footway/cycleway is also proposed along Hook Rise South.

Mayoral CIL is payable at a rate of £35 per sq.m.

A summary of the mitigation measures and further information required is summarised below:

- Residential Parking Strategy and Management Plan
- A contribution to undertake a CPZ study and implementation
- A mechanism whereby future residents are prevented from applying for parking permits within an extended CPZ
- Three year’s free car club membership for all new residents
- Changes to the design of the scheme along the frontage of Kingston Road and a financial contribution towards the strategic highway improvements
- A s278 agreement with TfL for highway works
- Bus capacity s106 payments (£300,000)
- Costs to extend the 281 bus service to Lansdowne Close (£582,250)
- Bus infrastructure costs (£225,096)
- Stage 1 Road Safety Audit for bus interchange - a mechanism whereby the detailed design of the bus interchange will need to be agreed with TfL
- Contribution towards a new cycle hub
- Further work on ensure that the development adequately responds to any future proposals to improve the station and surroundings
- Residential and Workplace Travel Plans to be secured, monitored, reviewed, and enforced through the s106
- A Delivery and Servicing Plan to be secured by condition
- A Construction Management Plan to be secured by condition

Local planning authority’s position

72 Kingston Council is likely to report this application to its planning committee in March 2017.

Legal considerations

73 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

74 There are no financial considerations at this stage.

Conclusion

75 London Plan policies on housing, density, urban design, inclusive access, sustainable development and transport are relevant to this application. In general, the proposed scheme is supported. However further discussion and information is required on the issues summarised below to ensure the proposal complies with London Plan.

- **Affordable housing** – Aside from a financial viability appraisal the application has provided no information on the proposed affordable housing offer. The current offer of 13.16% (125 units) is not acceptable and is subject to a review. Further discussion between all parties on the proposed affordable housing offer including the quantum, the proposed products, their affordability, the phasing and a review mechanism will be needed to ensure the proposal provides the maximum reasonable amount of affordable housing to comply with the London Plan Policy 3.12.
• **Child play space** – The proposal fails to provide 610 sq.m. of designated child play space for children under the age of 5. As such it does not comply with Policy 3.6 of the London Plan.

• **Urban design** – The masterplan approach is supported. However further work is required to ensure the proposal complies with the design policies contained in chapter 7 of the London Plan. The emerging landscaping and public realm strategy must ensure the proposal provides legible pedestrian friendly routes to and through the site. The heavily glazed wedge-shaped building appears at odds with the rest of the development and there is insufficient information to assess the quality of the feature buildings.

• **Energy** – Further technical information and calculations are required to ensure the proposal complies with the energy policies in chapter 5 of the London Plan.

• **Transport** – The cumulative traffic generation and congestion issues need to be mitigated through the scheme design, highway works and s106 contributions set out in the transport section of this report to ensure the proposal complies with the transport policies in chapter 6 of the London Plan. Improvements to bus and rail facilities are also sought via s106 contributions and scheme design.

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