**Ailsa Wharf, Ailsa Street, London, E14 0LE**

in the London Borough of Tower Hamlets

planning application no. PA/16/02692

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### Strategic planning application stage 1 referral


### The proposal

Demolition of existing structures/buildings and the redevelopment of the site for a mixed use scheme providing 782 residential units (C3) and 1,941 sq.m GIA commercial floorspace (A1/A3/B1/D1/D2) within a series of thirteen building blocks varying between 3 and 16 storeys (maximum AOD height of 56.8); the creation of a new access road and the realignment of Ailsa Street; the provision of cycle and car parking spaces; and associated site-wide landscaping and public realm works.

### The applicant

The applicant is **Ailsa Wharf Developments Ltd**, the architects are **Stockwool Architects**, and the agent is **Nathaniel Lichfield & Partners**.

### Strategic issues

**Land-use:** Residential led mixed use is supported, further information on the impact of the waste site is required (paras 22 - 24).

**Housing:** The delivery of 782 new homes across a range of unit sizes and tenures in a high density scheme with a high standard of residential quality and on-site play space is supported. The scheme delivers 35% affordable housing at 70/30 split affordable rent/shared ownership (paras 25-38).

**Urban design:** The proposals for a permeable extension to Poplar are strongly supported (paras 39 - 44).

**Blue Ribbon Network and biodiversity:** The proposals represent a significant enhancement to the Blue Ribbon Network (paras 45 – 46).

**Transport:** The proposals are broadly supported in transport terms. Revisions to cycle parking and landscaping required (paras 59 – 71).

### Recommendation

That Tower Hamlets Council be advised that while the scheme is broadly acceptable in strategic planning terms, the application does not fully comply with the London Plan, with the reasons and remedies set out in paragraph 75 of this report.
Context

1 On 22 September 2016 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 2 November 2016 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 Category 1A, 1B and 1C of the Schedule to the Order 2008:

- 1A: Development which comprises or includes the provision of more than 150 houses, flats, or houses and flat;
- 1B: Development (other than development which only comprises the provision of houses, flats, or houses and flats) which comprises or includes the erection of a building or buildings - outside Central London and with a total floorspace of more than 15,000 square metres.
- 1C: Development which comprises or includes the erection of a building in respect of which one or more of the following conditions is met: a) the building is more than 30 metres high and is outside the City of London.

3 Once the 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 (as amended) 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 site is located between the A12 Blackwall Tunnel Northern Approach and the River Lea, within the Lansbury Ward of the London Borough of Tower Hamlets. The site is 2.39 hectares in size and is occupied by various industrial activities, including car breaking, vehicle salvage, waste transfer and open storage and scrap yards. As a result the site is highly contaminated. The site is located within the Lower Lea Valley Opportunity Area and Poplar Riverside Housing Zone.

7 Bounded by the River Lea to the east, the context to the site comprises a mixture of commercial, community and residential uses. On the opposite bank of the River Lea is Prologis Business Park, which forms part of a wider strategic industrial location north of Canning Town. A High Voltage Cable crosses the River Lea to the application site in a ‘container bridge’ before running underground across the site towards Lochnagar Road and the junction with the A12. The application site excludes the safeguarded waste site immediately to its north, although this may come forward for housing in the future.

8 To the west of the site are a collection of buildings fronting the A12. These include 44 Gillender Street (serviced office units in recycled shipping containers) and Katherine Court (a mixed commercial and residential block), as well as a number of historic buildings (including...
Bromley Hall and Bromley Public Library). Behind the former library building are six live/work units. Further west, beyond the A12, is the Teviot Estate (owned and managed by Poplar HARCA).

9 The southern boundary of the site is formed by Lochnagar Street, which is currently characterised by warehousing and various areas of open storage. Further south is Bromley Hall School (which occupies a single storey Listed Building), and Nairn Street Estate (owned and managed by Poplar HARCA). Tower Hamlets Council owns the school site, and the parcel of land to the north, and it is understood that the Council plans to expand the school site northwards to meet Lochnagar Street.

10 The site is located within an area of archaeological importance and within the defended Environment Agency (‘EA’) Flood Zone 3 (i.e. land defined as having a 0.5% or greater annual probability of tidal flooding). The River Lea is tidally influenced at this location. At present the site is not served by working drainage and following heavy rain the road and adjoining land is subject to flooding. The River Lea and Lee Bow Creek, which form the boundary of the application site, form part of the River Thames and Tidal Tributaries Site of Metropolitan Importance (M031) and a Site of Importance for Nature Conservation.

11 The Limehouse Cut Conservation Area adjoins the north west of the application site. There are also various other heritage assets in the vicinity including: Bromley Hall, 43 Gillender Street (Grade II*), located to the north west; the Poplar Public Library, 45 Gillender Street (Grade II), located to the west; Brusnwick Road Fire Station, 25–37 Gillender Street (Grade II) to the west; and Bromley Hall School (Grade II) to the south. In addition, Langdon Park Conservation Area (encompassing various other Listed Buildings) is located further to the Southwest.

12 The A12 Blackwall Tunnel Northern Approach is part of the Transport for London Road Network. In terms of site accessibility, the nearest station is Langdon Park (approximately 500 metres to the west) which is served by the DLR. Bromley by Bow Station, served by District and Hammersmith & City lines is also located approximately 600 metres to the northwest. Two bus services (108 and 309) operate within a reasonable walking distance of the site, and the nearest Cycle Hire docking station is at Teviot Street (approximately 300 metres from the site). Overall the site registers a Public Transport Accessibility Level of one to three, on a scale of zero to six(b), where six(b) denotes the most accessible locations in the capital.

Details of the proposal

13 Full planning permission is sought for the comprehensive redevelopment of the site to include 782 residential units and 1,941sq.m (GIA) of commercial floorspace (A1/A3/B1/D1/D2), to be provided in the form of B1/small business workspace (1,373 sq.m), a retail unit (72 sq.m), an art show room with cafe (85 sq.m) and a gym (410 sq.m).

14 The proposed scheme comprises a series of thirteen blocks of residential and mixed-use buildings, with a varying building height of between three and 16 storeys. Four tall buildings are proposed, three of which are located in the south east corner of the site, along the river frontage and one at the corner of Lochnagar Street and the Blackwall Tunnel Northern Approach (A12) in the south west of the site. The three riverside towers will be 12 storeys, increasing to 13 storeys and then to 16 storeys at the south eastern corner of the site and the building on the corner of Lochnagar Street and the A12 will be 10 storeys. The 10 storeys building block will be adjoined by a seven storeys and an eight storeys building to the north, facing onto the A12.
Two further residential courtyard buildings are proposed in the centre of the site and are laid out as rectangular blocks with large internal landscaped gardens. The courtyard buildings will be predominantly seven and eight storeys, with a three storey element along the south. A further residential building of six and eight storeys is proposed within the south of the site.

The site incorporates a series of public and private open spaces including two large open spaces, three riverside pocket spaces, and a pocket area fronting the A12. The layout of the site is shown below:

![Site Layout](image)

**Case history**

The site has a long history of attempts to bring it forward for housing, which have been complicated by land ownership and planning policy issues, particularly in respect to waste policy and waste apportionment.

GLA officers hosted a pre-application meeting with the applicant in December 2015 and followed this up with a further meeting in March 2016. The scheme was supported in principle as a valuable opportunity to open up a significant stretch of the west bank of the River Lea, and to catalyse the regeneration of the Poplar Riverside in accordance with the objectives of London Plan Policy 2.13 and the Lower Lea Valley OAPF. At pre-application stage the waste site to the north formed part of the proposed scheme and issues were raised with respect to waste capacity. However, the waste site has been omitted from the application proposals. Other matters to be addressed related to housing; social infrastructure; urban design; inclusive access; sustainable development; and, transport.
Strategic planning issues and relevant policies and guidance

19 The relevant issues and corresponding policies are as follows:

- **Principle of development**
  - London Plan;
- **Housing**
  - London Plan; Housing SPG; Housing SPG, Neighbourhoods: Play and Informal Recreation SPG; Shaping Neighbourhoods: Character and Context SPG; Draft Housing SPG;
- **Urban design**
  - London Plan; Shaping Neighbourhoods: Character and Context, SPG; Housing SPG; London Housing Design Guide; Shaping Neighbourhoods: Play and Informal Recreation SPG;
- **Historic environment**
  - London Plan;
- **Blue Ribbon Network**
  - London Plan;
- **Inclusive design**
  - London Plan; Shaping Neighbourhoods: Accessible London: Achieving an Inclusive Environment SPG
- **Climate change mitigation**
  - 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
- **Flood risk and drainage**
  - London Plan; Mayor’s Water Strategy;
- **Transport**
  - London Plan; the Mayor’s Transport Strategy; Mayoral Community Infrastructure Levy; Crossrail SPG

20 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plans in force for the area are is the Tower Hamlets Core Strategy 2010 and Managing Development Document 2013) and the 2016 London Plan (Consolidated with Alterations since 2011).

21 The following are also relevant material considerations:

- The Lower Lea Valley Opportunity Area Planning Framework (2007);

Principle of development

22 London Plan Policy 2.13 strongly promotes urban renewal within the Lower Lea Valley Opportunity Area, including the managed release of appropriate industrial sites for mixed-use development. The Lower Lea Valley OAPF provides a strategic framework for this approach, and broadly identifies this site as within an area of land west of Bow Creek that is suitable for residential-led redevelopment. Furthermore, following its designation in June 2015, the site also falls within the Mayor’s Poplar Riverside Housing Zone.

23 At the local level, site allocation 11 within the Tower Hamlets Development Management Document identifies this site (as part of a wider parcel of land west of Bow Creek) for mixed use redevelopment to provide a strategic housing development, primary school and other compatible uses (including employment floorspace). The allocation also applies waste site safeguarding to a 0.5 hectare area of land to the north of the site, and promotes the careful integration of a new waste management facility as part of comprehensive mixed use redevelopment.
Having regard to the policy context above, GLA officers strongly support the principle of residential-led redevelopment at this site in strategic planning terms. The safeguarded waste site does not form part of the proposed development. Whilst it is understood that the site has not functioned as a waste transfer facility since 2012 further detail should be provided for consideration of the impact that the introduction of sensitive residential receptors will have upon potential for waste operations to resume at the site and its designation remain unchanged.

**Housing**

25 London Plan Policy 3.3 confirms the pressing need for more homes in order to promote opportunity and provide a real choice for all Londoners in ways that meet their needs at a price they can afford. Part B of this policy states that the Mayor will seek to ensure that the housing need identified in paragraphs 3.17 and 3.18 of the London Plan is met, particularly through provision consistent with at least an annual average of 42,000 net additional homes across London. London Plan. Tower Hamlet’s annual monitoring target is 3931 additional homes per year between 2015 and 2025.

26 This site forms part of the Poplar Riverside Housing Zone, which is prioritised for accelerated housing delivery with GLA funding support and is identified to provide 6,404 homes. The site is also located within the Lower Lea Valley Opportunity Area, within the Poplar Riverside sub-area, which the OAPF assumes has a potential capacity to deliver 1,750 and 1,850 homes. The proposed development would provide 782 new residential units, equivalent to 19.9% of Tower Hamlets annual monitoring target, 12.2% of the of the Housing Zone target and 42.3% of the potential capacity of the Poplar Riverside sub area of the Opportunity Area. The proposed development will make a valuable contribution to housing delivery and is strongly supported.

28 The proposed development would provide the following mix of residential units:

<table>
<thead>
<tr>
<th>Market</th>
<th>Affordable rent</th>
<th>Intermediate</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Studio</td>
<td>74</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>1 Bed</td>
<td>205</td>
<td>43</td>
<td>51</td>
</tr>
<tr>
<td>2 Bed</td>
<td>192</td>
<td>36</td>
<td>40</td>
</tr>
<tr>
<td>3 Bed</td>
<td>77</td>
<td>43</td>
<td>0</td>
</tr>
<tr>
<td>4 Bed</td>
<td>0</td>
<td>21</td>
<td>0</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>548</strong></td>
<td><strong>143</strong></td>
<td><strong>91</strong></td>
</tr>
</tbody>
</table>
Affordable housing

29 London Plan policy 3.12 requires borough councils to seek the maximum reasonable amount of affordable housing when negotiating on individual private residential and mixed-use schemes. In doing so each council should have regard to its own overall target for the amount of affordable housing provision. Tower Hamlet’s Core Strategy 2010 Policy SP02 sets an overall strategic target of 50%, requiring 35% - 50% affordable homes on sites providing 10 new residential units or more. London Plan Policy 3.11 includes the strategic target that 60% of new affordable housing should be for social rent or affordable rent and 40% for intermediate rent or sale. Core Strategy Policy SP02 requires an overall strategic target that 70% of new affordable housing should be for social rented and 30% intermediate.

30 The scheme proposes that 234 of the 782 new units will be affordable, which equates to 35% by habitable room, with a tenure split of 70% affordable rent and 30% intermediate. The applicant has submitted a viability appraisal in line with Policy 3.12 in order to demonstrate that the level of affordable housing provision is the maximum reasonable amount the scheme can deliver. The applicant’s viability assessment indicates an overall viability shortfall. This is currently being independently assessed by consultants, on behalf of the Council.

31 The affordable housing offer as presented includes affordable rented units and shared ownership units. The submitted viability assessment includes an affordability check for the proposed affordable housing. This demonstrates that 1 bed shared ownership units would be affordable to households with a gross income of £50,000 p.a. and the 2 bed shared ownership units would be affordable to households with gross incomes of £65,000 p.a. which complies with London Plan Policy 3.10. In terms of the affordable rent units further discussion is required with GLA officers, the Council and the applicant regarding the level of rent required to meet local housing needs.

Housing mix

32 London Plan Policy 3.8 requires new developments to offer a range of housing choices, in terms of sizes and types. London Plan Policy 3.11 accord a priority to family sized affordable housing. The proposed residential accommodation comprises a range of unit sizes from one bed to four bed flats that will assist in delivering a mixed and balanced community, which is welcomed. The proposed dwelling mix has been derived having regard to local and borough wide objectives and to maximise housing choice. The Council should confirm that the proposed mix reflects its own housing requirements and its understanding of local demand.

Children’s play space

33 The child yield and play space requirements have been calculated in accordance with the Mayor’s Shaping Neighbourhoods: Children and Young People’s Play and Informal Recreation SPG. Based on the SPG 252 children are predicted to live at the development, which generates an overall playspace requirement of 2519 sq.m.

34 Overall the development will provide 5,922 sq.m of landscaped open space and 899 sq.m of communal amenity space. The landscape design statement has identified areas where play space can be successfully integrated into the landscape with the potential to provide 2630sq.m of play space. Much of the play space will be provided in the communal amenity space, which integrates active and passive recreation. The play strategy outlined in the landscape design statement is supported and the Council should secure the detailed design and delivery of play space to ensure compliance with London Plan Policy 3.6 and the SPG.
Density

35 In terms of residential density, based on a site of central characteristics and a public transport accessibility level of one to three, the London Plan density matrix (Table 3.2) would suggest a density range in the region of 300 to 650 habitable rooms per hectare for this site. Notwithstanding this, the London Plan (paragraph 2.62) and associated guidance within the Mayor’s Housing SPG, acknowledges the potential for large development sites in Opportunity Areas to define their own character.

36 The scheme delivers a site density of 833 habitable rooms per hectare. Whilst this exceeds the range identified in Table 3.2, having regard to the character of the local context and the residential quality and urban design considerations set out below, the principle of a high quality, high density development on this Opportunity Area site is supported in the interests of optimising development potential and increasing housing supply in accordance with London Plan policies 3.3 and 3.4.

Residential quality

37 London Plan Policy 3.5 promotes quality in new housing provision and sets out minimum space standards at Table 3.3. As of 1 October 2015 the Government’s technical housing standards came into effect, and these have been adopted through a minor alteration to the London Plan.

38 Internally, all units meet or surpass the overall minimum unit floor area and the minimum internal room space standards. With regards to external amenity provision, all units have either a balcony of at least 5 sq.m or a generously sized terrace. Despite the relatively high density of the scheme, the offsets between building façades will permit a high-quality aspect to all the dwellings proposed. The design seeks to maximise the number of homes with more than one aspect. Increasing the number of circulation cores within the floor plans has enabled many apartments to have ‘through’ layouts with aspects on two opposing sides. Across the scheme 409 of the 782 homes have dual or triple aspect equating to 52% of the scheme total. The majority of single-aspect units are smaller, one bedroom homes. The layout has been carefully considered to avoid single aspect north-facing units with longer dual-aspect family units introduced to northern facades to avoid centrally placed units with compromised outlooks. Overall the development provides a good standard of residential quality and complies with London Plan Policy 3.5.

Urban design

39 The emerging masterplan proposes a combination of perimeter and linear block typologies, which have been well laid out in response to the orientation of the site, and the opportunities presented by the River Lea frontage. Crucially, the arrangement supports the creation of two new east–west routes from the A12 to the Lea riverside. This is strongly supported, and responds well to local aspirations to deliver a new pedestrian and cycle bridge between Poplar and the Prologis Business Park, accessed on the Tower Hamlets side via Lochnagar Street (see para 66).

40 The proposed layout of masterplan blocks allows for the creation of various areas of open space for public use and private residential amenity. A well-proportioned public open space is proposed at the heart of the scheme, one block back from the river, which would be well-defined by surrounding blocks. This park, in conjunction with the other pocket riverside spaces proposed, represent a significant public benefit of the scheme.

41 In terms of scale, the development establishes a general site–wide datum of seven to eight storeys. This broadly responds to the existing context of development along this part of the A12, providing a moderate increase in scale that is appropriate given the size of the site and the areas transitional nature and Opportunity Area status. The scheme proposes four taller buildings.
including three buildings on the river frontage of twelve, thirteen and sixteen storeys, ascending in height from south to north, to provide visual distinction, with the tallest building marking the proposed bridge in the southeast corner of the site. The taller buildings optimise the river frontage, and broadly relate to the emerging context that includes the redevelopment of the Riverside Industrial Estate to the north with a building of 13 storeys adjacent to the river. The fourth taller building is ten storeys and located at the southwestern corner, where the additional height is appropriate to mark the entrance into the site.

As previously noted the site is adjacent to the Limehouse Cut conservation Area and there are a number of listed buildings within the vicinity. In addition to the Langdon Park Conservation Area is located further to the southwest. A townscape and visual impact assessment has been submitted as part of the Environmental Impact Assessment. The existing context of these heritage assets is of a generally low quality industrial / urban character with the A12 a significant detracting feature. Whilst the development will be visible within the setting of these heritage assets the introduction of new high quality townscape will not be harmful.

The facades will predominantly be expressed with simple detailing of grid frame arrangement with recessed openings. The facades adjacent to the A12, will have specific facades that respond to this potentially harsh location. The building has been designed with corridors facing the A12 wherever possible. In front of this a secondary layer of glazing will moderate the noise and pollution of the main road whilst a distinctive screen treatment will address the visual impacts and privacy issues. Overall, the approach to elevational design and materials creates attractive high quality elevations which contribute to the legibility of the site and the character of the area, which is supported.

The scheme represents a valuable opportunity to open up a significant stretch of the west bank of the River Lea, and to catalyse the regeneration of the Poplar Riverside in accordance with the objectives of London Plan Policy 2.13 and the Lower Lea Valley OAPF. The applicant’s commitment to provide a permeable neighbourhood extension to Poplar is strongly supported, and the positive evolution of the scheme since the initial pre-application meeting in December 2015 is welcomed. The proposals provide an appropriate response to the context and nearby heritage assets and the development of high quality tall buildings site is supported. Overall, the proposals comply with the design principles set out in the Chapter 7 of the London Plan.

**Blue Ribbon Network and biodiversity**

The River Lea and Lee Bow Creek, which form the boundary of the application site, form part of the River Thames and Tidal Tributaries Site of Metropolitan Importance (M031) and a Site of Importance for Nature Conservation. London Plan Policies 7.24 and 7.29 establish the strategic importance of the Blue Ribbon Network and aim to restore and enhance it, increase its use, whilst protecting its ecology and open character.

The proposals will open up new routes through to and along the River Lea, which is welcomed. The buildings along the river frontage are set back to allow the creation of a new landscaped river path that includes biodiversity enhancement features to maximise the sites ecological value. The proposals also provide a landing point for a new river crossing, which is strongly supported. Overall the proposals represent a significant enhancement to the river environment and are supported in accordance with the Blue Ribbon Network policies within the London Plan.
**Inclusive design**

47. London Plan Policy 7.2 seeks to ensure that new development achieves the highest standards of accessible and inclusive design. The proposed development has been designed in accordance with the principles of inclusive design and the needs of disabled and ambulant disabled occupants and visitors have been considered throughout the design process.

48. The existing site falls gently from north to south, which results in a drop of 2.0m across a distance of 180m, a fall which is largely imperceptible on site. Whilst individual building entrances are set at differing levels to accommodate this and achieve level thresholds, finished levels within the public realm will generally follow the existing site resulting in a development that will be wholly accessible to ambulant pedestrians and wheelchair users alike.

49. As previously noted the flood risk strategy requires that no living accommodation is designed below a level of 4.4AOD, which presents a potential problem for accessible access. To address this, communal entrances will feature dual-access through lifts that will provide an accessible route from entrance level to the first floor of residential accommodation - in some cases a difference of only 1000mm.

50. 10% of the new dwellings have been designed as per the requirements set out in the Building Regulations Part M4(3): Category 3 (Wheelchair User Dwellings), to be adaptable for wheelchair users, which is supported. The scheme will also include Blue Badge parking spaces with 76 spaces provided at basement level and two spaces provided on-street. The Council should secure the provision of wheelchair units and blue badge parking through condition or legal agreement to ensure compliance with London Plan Policy 7.2.

**Climate change mitigation**

**Energy strategy**

51. A range of passive design features and demand reduction measures are proposed to reduce the carbon emissions of the proposed development. The demand for cooling will be minimised through natural ventilation where possible and mechanical ventilation with heat recovery. The applicant should provide evidence of how Policy 5.9 has been assessed demonstrating how the risk of overheating and the cooling demand will be minimised (for each building type).

52. The applicant has carried out an investigation and has concluded that there are no existing but a few planned district heating networks within the vicinity of the proposed development. According to the London Heat Map the development is also within a district heating opportunity area. The applicant should therefore contact the local borough energy officer to determine the current situation of this opportunity area and the relevant stakeholders/network operators to acquire information on the proposed networks; evidence of correspondence should be provided to demonstrate that these opportunities have been fully investigated. 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 and the Council should secure this commitment via section 106 legal agreement.

53. The applicant is proposing to install a site heat network. The applicant should confirm that all apartments and non-domestic building uses will be connected to the site heat network. A drawing showing the route of the heat network linking all buildings on the site should be provided. The site heat network will be supplied from a single energy centre. Further information on the floor area and location of the energy centre should be provided.
The applicant is proposing to install a 140 kWe / 212 kWth gas fired CHP unit as the lead heat source for the site heat network. The applicant should review their numbers on the estimated carbon savings associated with the CHP operation to verify the correct carbon savings. The Council should secure the provision of a CHP unit sized accordingly with an appropriately worded condition.

The applicant has investigated the feasibility of a range of renewable energy technologies and is proposing to install 1,010sq.m of photovoltaic panels with a rated output of roughly 155kWp. A roof layout has been provided, which shows that there is additional free space for PV installation. The applicant should review their proposed installation and aim to provide further savings from on-site renewable measures. The Council should secure the provision of photovoltaic panels with an appropriately worded condition.

A reduction of 420 tonnes of CO\textsubscript{2} per year in regulated emissions compared to a 2013 Building Regulations compliant development is expected, equivalent to an overall saving of 45%. The carbon dioxide savings exceed the target set within Policy 5.2 of the London Plan, which is strongly supported. However, the comments above should be addressed before compliance with London Plan energy policy can be verified.

**Flood risk and sustainable drainage**

The flood risk map indicates that the site lies within Flood zone 3 where the Environment Agency categorises such sites as having a ‘medium’ likelihood to suffer flooding. The flood risk assessment that accompanies this application identifies a flood safety level of 4.4m A.O.D. The natural topography of the site rises from 3.2m A.O.D. in the south-western corner of the site to 5.2m A.O.D. in the north-eastern corner. The design of the residential element of the scheme ensures no living accommodation will be located below the 4.4 level. In dwellings which enter below the 4.4 floor level (see adjacent diagram) a stepped section will be employed at ground floor to ensure all living accommodation is located above this level. The proposals are supported in accordance with London Plan Policy 5.12.

A surface water management strategy has been submitted in support of the application. Due to the presence of contaminated land and high groundwater levels underlying the site, the use of infiltration methods are not considered appropriate due to the risk of contamination to the wider environment. As it is known that the River Lea is predominately tidal at this location, some of the surface water generated by the site will be discharged directly into the River Lea with an unrestricted discharge rate. For the southwest corner of the site, due to existing ground levels and the inability to establish a gravity connection, surface water will be discharged to the public sewer. The approval and implementation of a final detailed sustainable drainage strategy should be secured by condition, along with attenuation features such as green roofs, to ensure compliance with London Plan Policy 5.13.

**Transport for London**

The trip generation and mode split assessment is broadly satisfactory. A total of 209 residential car parking spaces are proposed, which equates to 0.27 parking spaces per dwelling. Included in this total are 78 blue badge bays, which equates to one per wheelchair accessible unit. Electric vehicle charging points are proposed at 20% active and 20% passive provision. These parking proposals adhere to the London Plan and are acceptable in view of the site’s PTAL. The car park management plan should be secured by condition.

The non-residential element of the development is proposed as car free. This proposal supports sustainable transport and minimises the impact on the A12/Lochnagar Street junction and is therefore supported.
61 The only site vehicle access will be via the A12/Lochnagar Street junction. Every opportunity should be taken to minimise additional vehicle trips at this junction. TfL officers have reviewed the potential highways impact and consider that there will not be a negative impact on the road network, particularly as no signal time changes are being made.

62 The proposed long and short stay cycle parking provision for retail, office and residential land use classes is in compliance with the London Plan minimum requirement. However, the applicant should provide further details of other land uses such as the gym and art showroom to ensure compliance.

63 TfL officers have a number of concerns in terms of the location of cycle parking throughout the site and in a number of cases do not deem this acceptable due to potential conflicts with other vehicles and car parking. The applicant should give further consideration to the cycle parking for the development, ideally these should be located in convenient locations, as close to access points as possible. Clarification is also sought as to the location of short stay cycle parking across the site. Furthermore, consideration to the types of cycle parking design should be given in line with the London Cycling Design Standards (LCDS). This should be secured through condition, in consultation with TfL.

64 Whilst consideration for crossing facilities on the A12 for pedestrians is welcomed, further consideration needs to be undertaken for cyclist access. The inclusion of a cycle hire docking station on the site is supported.

65 The inclusion of a PERS audit as part of the transport assessment is welcomed. Identified improvements should be delivered by the developer through a Section 278 agreement with the relevant highway authority as an obligation within the Section 106 agreement. Whilst the scale of the development is not sufficient to require additional bus capacity, any improvements to the local environment must include the preservation and/or enhancement of existing bus stops.

66 Although not part of the current application the integration of a new bridge across the River Lea is supported. The bridge should be designed to accommodate pedestrian and cycles in line with the LCDS. GLA and TfL officers will continue to work with the applicant and both boroughs as the design develops. The landing area for the bridge in the application site should be safeguarded until required through section 106 legal agreement.

67 The landscape masterplan includes proposals for the A12 footway, extending beyond the red line boundary, including the repaving of the public highway up to the kerb line. Consideration needs to be given to how this will tie in with the existing paving to the north and south. TfL recommends the applicant refer to the streetscape toolkit for public space design guidance: [https://tfl.gov.uk/corporate/publications-and-reports/streets-toolkit](https://tfl.gov.uk/corporate/publications-and-reports/streets-toolkit)

68 The site is served by two pedestrian connections from the A12. The northernmost route provides a pedestrian connection to the north from the subway eastwards into the site, and the second follows the alignment of Lochnagar Street. The northern connection should be designed as a direct and legible link into and through the site. It should accommodate predicted cycle use given the proximity to the subway ramp access, enabling cyclists to access the site directly from the subway. The Landscape Masterplan currently shows benches in this location, which encroach on the width of the link. Placing seating here may encourage people to dwell in this space and in turn discourage people from using it as a link. The Applicant is encouraged to revise this part of the Landscape Masterplan and refer to the LCDS for further information.
TfL requests that a draft Delivery and Servicing Management Plan and draft Construction Logistics Plan should be provided prior to further consultation. Full versions of these documents should be secured by condition and no work should commence until the full Construction Logistics Plan has been approved in consultation with TfL.

The submission of a draft Framework Travel Plan is welcomed and a full Travel Plan should be secured with funding through the section 106 legal agreement.

The mechanism for contributions to be made payable towards Crossrail has been set out in the Mayor’s Supplementary Planning Guidance (SPG) ‘Use of planning obligations in the funding of Crossrail and the Mayoral Community Infrastructure Levy’ (March 2016) and London Plan policies 6.5 and 8.3. It is noted that the proposed development is within LB Tower Hamlets, where the Mayoral charge is £35 per square metre Gross Internal Area (GIA). The levy will raise £300 million towards the delivery of Crossrail.

Local planning authority’s position

The Council is currently assessing the application and a provisional committee date in February 2017 has been set for the application to be presented to planning committee.

Legal considerations

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

There are no financial considerations at this stage.

Conclusion

London Plan policies on housing, design, Blue Ribbon Network, inclusive access, flood risk, sustainable drainage, climate change and transport are relevant to this application. The application broadly complies with the London Plan however, further information and/or confirmation, as detailed below is required to comply fully.

- **Housing:** The delivery of 782 new homes across a range of unit sizes and tenures in a high density scheme with a high standard of residential quality and on-site play space is supported. The scheme would deliver 35% affordable housing by habitable room with a 70:30 affordable rent: intermediate split.

- **Climate change:** Overall a reduction of 420 tonnes of CO₂ per year in regulated emissions compared to a 2013 Building Regulations compliant development is expected; equivalent to an overall saving of 45% is strongly supported. Further information is required to verify the savings.
Transport: The proposals are broadly supported in transport terms. Revisions to cycle parking and landscaping are required. Draft delivery service plan and construction logistics plan required.

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