Victoria Hall and Cumberland Hotel, Harrow town centre
in the London Borough of Harrow
planning application no. P/4332/17

Strategic planning application stage 1 referral

The proposal
Residential-led redevelopment of up to 16-storeys to provide 204 residential units, 569 sq.m. of community space, 79 sq.m. of flexible retail space and associated landscaping and access.

The applicant
The applicant is Origin Housing, and the architect is MOSS Architecture.

Strategic issues summary
Opportunity Area: The residential-led mixed use intensification of this highly accessible town centre site is strongly supported (paragraphs 13 to 14).

Social infrastructure: The proposed provision of enhanced community space as part of this comprehensive redevelopment is strongly supported (paragraph 15).

Housing: The affordable housing offer (42% with grant) has been independently verified as the maximum level. Early and late stage reviews must be secured in accordance with draft London Plan Policy H6 and the Mayor’s Affordable Housing and Viability SPG (paragraphs 16 to 27).

Urban design: The proposed design and public realm enhancements are supported (paragraphs 28 to 31).

Sustainable development: The applicant must investigate the potential for further carbon dioxide savings for the non-residential component of the development. Urban greening and sustainable urban drainage systems must be secured by planning condition (paragraphs 33 to 34).

Transport: Whilst the scheme is generally acceptable in strategic transport terms, the applicant must address outstanding matters with respect to public transport; car parking; cycling and walking; travel planning; and, servicing and construction (paragraphs 35 to 42).

Recommendation
That Harrow Council be advised that, whilst the scheme is broadly supported in strategic planning terms, the application does not yet fully comply with the London Plan and draft London Plan for the reasons set out in paragraph 46 of this report. The resolution of those issues could, nevertheless, lead to the application becoming compliant with the London Plan and draft London Plan.
Context

1 On 12 October 2017 the Mayor of London received documents from Harrow 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 must 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.

2 The application is referable under the following categories of the Schedule to the Order 2008:

- 1A 1. “Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats”;
- 1C 1.(c) “Development which comprises or includes the erection of a building of… more than 30 metres high and is outside the City of London”.

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

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

Site description

5 The 0.5 hectare site is located within Harrow metropolitan town centre and comprises: the Cumberland Hotel, which fronts Sheepcote Road to the northeast and St. John’s Road to the southwest (and benefits from permission for 121 new residential units, 67% affordable with grant, and two commercial units); and, Victoria Hall (fronting Sheepcote Road), which is a community facility affiliated with St. John’s Church, adjacent to the north. The site is not within a Conservation Area and none of the existing buildings on site are listed. However, St. John’s Church is Grade II Listed. There also various other designated heritage assets in the vicinity, including Station Road War Memorial (Grade II) and Granada Cinema Building (Grade II).

6 The site falls within the Harrow & Wealdstone Opportunity Area and Housing Zone, and Harrow town centre is undergoing a steady process of urban renewal, with various strategic development proposals coming through the planning and delivery pipeline. Immediately to the north of this site, the redevelopment of the former Lyon House office site (GLA reference: PDU/2721/02 - 287 new homes, 17% affordable without grant, and 3,051 sq.m. of commercial space in buildings of up to 14-storeys) is now well underway.

7 In terms of the public transport accessibility of the site, Harrow-on-the-Hill station is approximately 480 metres to the southwest providing both London Underground services (Metropolitan line) and national rail services (between Marylebone and Aylesbury). In addition, there are numerous bus routes (including one 24-hour route) within 500 metres of the site. Overall, the site registers a public transport accessibility level of six(a), on a scale of zero to six(b), where six(b) denotes the most accessible locations in the capital.

Details of the proposal

8 Comprehensive residential-led redevelopment up to 16-storeys to accommodate:
• 204 new residential units (42% affordable on a habitable rooms basis, before grant);
• 569 sq.m. community facility (to replace the existing Victoria Hall);
• 79 sq.m. flexible ground floor retail unit; and,
• a new pedestrian route from Sheepcoate Road to St. John’s Road, incorporating a new public space between the community facility and St. John’s Church.

Case history

9 In October 2015 Origin Housing secured planning permission P/0586/15 for 121 units (67% affordable with grant) and two commercial units on the Cumberland Hotel site. The associated application was not referable to the Mayor of London. It is understood that this application remains implementable, however, following subsequent changes to the landscape of grant funding a new agreement on the level of grant funding for this development would need to be agreed before the scheme could be delivered.

10 Since the above-mentioned permission was granted, Origin reached an agreement with the Trustees of Victoria Hall to extend the development onto the Victoria Hall site, and to reprovide the existing community space within a larger, more comprehensive scheme. GLA officers held pre-application meetings to discuss this proposal on 15 April 2016 and 29 June 2017. The advice issued by GLA officers welcomed the evolution of this scheme into a more comprehensive form of development, and strongly supported the proposed new homes and improved community space that it would provide. The applicant’s commitment to deliver at least 40% affordable housing was also supported. The applicant was, nevertheless, advised that detailed issues respect to: housing; urban design; inclusive access, sustainable development; and transport needed to be addressed by the future planning application.

Strategic planning issues and relevant policies and guidance

11 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 2012 Harrow Core Strategy and Proposals Map; 2013 Harrow and Wealdstone Area Action Plan; 2013 Development Management Policies Local Plan; and, the 2016 London Plan (Consolidated with Alterations since 2011).

12 The following are relevant material considerations:

• National Planning Policy Framework and National Planning Practice Guidance; and,
• Draft London Plan (consultation draft December 2017).

• Opportunity Area London Plan;
• Social infrastructure London Plan;
• Housing London Plan; Affordable Housing and Viability SPG; Housing SPG; Housing Strategy; Shaping Neighbourhoods: Play and Informal Recreation SPG; Shaping Neighbourhoods: Character and Context 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;
Principle of development

13 The site is located in Harrow metropolitan town centre, within the Harrow and Wealdstone Opportunity Area. The site also falls within the Harrow Housing Zone, which is prioritised for accelerated housing delivery with GLA funding support. London Plan Policy 2.13 and Policy SD1 of the draft London Plan identifies the Opportunity Area having indicative capacity for 1,000 to 3,000 new jobs and 2,800 to 5,000 new homes. At the local level, the adopted Harrow and Wealdstone Area Action Plan (HWAAP) is the primary policy vehicle for shaping growth and change in this part of the borough. Whilst this site is not one identified specifically by the HWAAP, the plan recognises that there are various opportunities for development of this nature to support long-term regeneration in this particular part of the town centre.

14 Having regard to the policy context set out above, and noting the extant permission at the Cumberland Hotel site, the proposal to provide 204 new homes and (reprovided) community space is supported in strategic planning terms.

Social infrastructure

15 As discussed in paragraph 6 Victoria Hall (a community facility affiliated with St. John’s Church) forms part of the site. The hall provides 558 sq.m. of community floorspace, which is currently provided at both ground and first floor level. Further to discussions at pre-application stage it is clear that the applicant has engaged extensively with the trustees of Victoria Hall in order to successfully incorporate the Victoria Hall site as part of this redevelopment scheme to provide new homes and improved community space. Accordingly the applicant proposes to provide a new community facility of 569 sq.m., which has been designed in collaboration with the Victoria Hall trustees, and will be delivered to a basic level of internal fit out. The new community space would also benefit from being all at grade; which offers improved accessibility, as well as increased flexibility and breakout opportunities. GLA officers strongly support the proposals for the reporvision of community space in line with London Plan Policy 3.16 and Policy S1 of the draft London Plan.

Housing

16 This site forms part of the Harrow Housing Zone, which is prioritised for accelerated housing delivery with GLA funding support. Further to the extant consent for 121 units (67% affordable with grant) at the Cumberland Hotel part of this site, the applicant has coordinated a more comprehensive scheme with adjoining land in order to propose 204 new homes and improved community facilities. This approach would achieve a more efficient use of highly accessible town centre land, and deliver additional homes in accordance with London Plan Policy 3.3 and Policy H1 of the draft London Plan (increasing housing supply). Table 1 below sets out the proposed residential schedule.
## London Plan Policy 3.12 seeks the maximum reasonable amount of affordable housing and the Mayor’s Affordable Housing and Viability SPG establishes a minimum pan-London threshold level of 35% affordable housing (before subsidy) as part of the Mayor’s strategic long-term objective to increase the level of affordable housing delivered through the planning system to 50%. This approach is carried forward by policies H5 and H6 of the draft London Plan.

As discussed in paragraph 9, extant permission P/0586/15 was secured at the Cumberland Hotel part of this site in October 2015. This permission included a 67% provision of affordable housing, subject to the investment of affordable housing grant under the former funding programme for affordable housing completions up to 2018. The offer comprised 83 affordable units (27 affordable rent and 56 intermediate). Whilst it is understood that this scheme remains technically implementable, the associated grant funding offer expired in March 2017. Accordingly, a new agreement on the provision of affordable housing funding would be required in order to deliver that scheme. This would be subject to changed funding terms, which have been designed in line with the Mayor’s objective to deliver genuinely affordable homes in response to London’s need. Having regard to this, and noting that the extant permission includes affordable rent units of up to 80% of local market rent, it is unlikely that a 67% provision of affordable housing could be viably sustained whilst simultaneously delivering the deeper discounts required as a prerequisite of the current grant funding programme. For the avoidance of doubt, the planning application associated with the extant permission did not include a full viability assessment, therefore, it is not currently clear what provision of affordable housing the extant permission would achieve on a ‘nil grant’ basis.

The current, larger, scheme proposes a 42% provision of affordable housing (by habitable room) with grant under the current 2016–21 programme. As set out in Table 1 above, the proposed provision comprises 77 affordable units (27 London Affordable Rent and 54 intermediate). The current proposal would achieve an overall increase of 83 housing units compared to the extant permission at the Cumberland Hotel part of the site, but would provide two fewer intermediate affordable housing units.

As a general principle in line with the policy context set out in paragraph 17 above, and in accordance with the basic economies of scale, the Mayor expects uplifts in housing density to deliver at least commensurate uplifts in affordable housing provision. Notwithstanding this, it is acknowledged in this case that the deliverability of the extant 67% affordable housing provision is contingent on a grant funding offer which has now expired (as discussed in paragraph 18). It is further acknowledged that the affordable housing offer currently proposed would provide significantly enhanced levels of affordability in line with Policy H7 of the draft London Plan and the Mayor’s Affordable Housing and Viability SPG. Having regard to the above, GLA officers have concluded that the most appropriate way to appraise the affordable housing offer within this scheme is to undertake a rigorous independent viability review, based on present day costs, values and grant conditions.

### Table 1: Proposed residential schedule

<table>
<thead>
<tr>
<th>Unit type</th>
<th>London Affordable Rent</th>
<th>Intermediate</th>
<th>Private market</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Studio</td>
<td>0</td>
<td>1</td>
<td>10</td>
<td>11</td>
</tr>
<tr>
<td>One-bedroom</td>
<td>6</td>
<td>16</td>
<td>34</td>
<td>56</td>
</tr>
<tr>
<td>Two-bedroom</td>
<td>19</td>
<td>33</td>
<td>79</td>
<td>131</td>
</tr>
<tr>
<td>Three-bedroom</td>
<td>2</td>
<td>4</td>
<td>0</td>
<td>6</td>
</tr>
<tr>
<td><strong>Total units</strong></td>
<td><strong>27</strong></td>
<td><strong>54</strong></td>
<td><strong>123</strong></td>
<td><strong>204</strong></td>
</tr>
</tbody>
</table>
Further to the above, the applicant has submitted a full viability assessment. Following rigorous independent review it has been verified that the scheme could not viably achieve 35% affordable housing before subsidy, and that the proposed 42% provision of affordable housing with grant is the maximum level of affordable housing that this scheme can achieve in current market conditions.

On the basis that it has been independently verified that this scheme would not achieve a 35% provision of affordable housing before grant, the application is subject to the requirements of the ‘Viability Tested Route’ as defined by Policy H6 of the draft London Plan and the Mayor’s Affordable Housing and Viability SPG. In line with this approach, the Section 106 agreement must secure early and late stage review mechanisms. The former is intended as an incentive to timely delivery, and the latter will ensure that the maximum level of affordable housing would be secured by the planning system through to the delivery stage.

In the interests of transparency, the Council is reminded that draft London Plan Policy H6 and the Mayor’s Affordable Housing and Viability SPG strongly encourages local planning authorities (LPAs) to publish any submitted financial viability assessment, and any associated independent viability review. The Mayor’s SPG makes clear that, where this information is not published by an LPA, the Mayor reserves the right to publish it himself.

Affordable housing tenures

The applicant proposes a tenure split of 35% London Affordable Rent and 65% intermediate (London Affordable Rent levels are set out within table 2 below, intermediate products will have eligibility capped at incomes of £90,000 per year). The weighting towards intermediate tenure has been developed following joint pre-application discussions, and accords with the parameters of the Mayor’s Affordable Housing and Viability SPG and Policy H6 of the draft London Plan on the basis that it secures at least 30% low cost rent and at least 30% intermediate. Further to this Harrow Council is content, having had regard to the Local Plan and the independent review of financial viability, that the remaining 40% would be shared as 12.5% London Affordable Rent and 87.5% intermediate.

<table>
<thead>
<tr>
<th>Tenure</th>
<th>London Affordable Rent</th>
</tr>
</thead>
<tbody>
<tr>
<td>One-bedroom</td>
<td>£144.26 per week</td>
</tr>
<tr>
<td>Two-bedroom</td>
<td>£156.80 per week</td>
</tr>
<tr>
<td>Three-bedroom</td>
<td>£167.00 per week</td>
</tr>
</tbody>
</table>

Table 2: Proposed affordability levels (London Affordable Rent).

Residential standards, play space and density

All dwellings will meet or exceed the minimum space standards established by London Plan Policy 3.5 (Table 3.3) and Policy D4 of the draft London Plan. The scheme also responds positively to the residential design quality benchmarks of the Housing SPG and includes the required 10% provision of wheelchair accessible/adaptable units. This is supported and should be secured by condition, along with Building Regulations standards M4(2) and M4(3) in line with London Plan Policy 3.8.

With respect to children’s play space, the scheme includes a designated play area of 349 sq.m., which is tailored towards doorstep play for children under five. Whilst this would exceed play requirements of young children at the site, this provision represents a marginal 31 sq.m. shortfall against the overall requirements of the Play and Informal Recreation SPG, when assessed across all age groups. The applicant has nevertheless demonstrated that the recreational needs of older children within the development can be met by various local open...
spaces in the general vicinity of the site. This approach is acceptable; however, the Council is encouraged to seek an open space contribution where appropriate to mitigate any intensified use of local spaces.

27 London Plan Policy 3.4 and Policy D6 of the draft London Plan seek to optimise housing density, with the draft London Plan placing greater emphasis on a design-led approach and requiring an independent design review of proposed development which exceeds various prescribed thresholds. In this case the scheme is 1,018 habitable rooms per hectare / 408 units per hectare. This marginally exceeds the threshold within Policy D6 of the draft London Plan and would therefore trigger the design review process. In this case the scheme has not been subject to an independent design review. However, it has been subject to qualified design critique and an iterative process of revision as part of various GLA and Harrow Council pre-application meetings. In general, noting the characteristics of the location and context (town centre and Opportunity Area), this site lends itself well to a high quality, high density mixed use development. The proposed density is in line with the typical range expected for a site of these characteristics as defined by Table 3.2 in support of London Plan Policy 3.4, and noting the broad support for the design and residential quality (as discussed in this report) the density is acceptable.

Urban design

28 The proposal responds well to the characteristics of this town centre site, and GLA officers strongly support the evolution of this scheme into a more comprehensive form - which helps to optimise residential density, deliver enhanced community facilities and provide a more integrated redevelopment to support the regeneration of this part of the town centre.

29 The scheme comprises three blocks - blocks A and B (7 to 8-storeys) which front Sheepcote Road; and, block C (10 to 16-storeys) which fronts St. John’s Road. Block B includes the new community facility, whilst block C would accommodate a ground floor commercial unit, fronting St. John’s Road.

30 The layout of these blocks is supported, and allows for a new east-west connection to be created between Sheepcote Road and St. John’s Road, through the centre of the site. The arrangement of blocks would also create a new courtyard space between Block B and St. John’s Church (Grade II). The proposed introduction of these new pieces of public realm is strongly supported, and the courtyard space in particular would help to create a high quality landscaped setting to the south of the Grade II Listed St. John’s Church.

31 Having considered the characteristics of this town centre site; the Opportunity Area and Housing Zone context; and, having had special regard pursuant to Section 66 of The Planning (Listed Buildings and Conservation Areas) Act 1990, GLA officers support the design, height, scale and massing of this residential-led mix use redevelopment, which would deliver new connectivity and public realm, improved community facilities and enhancements to the setting of the neighbouring St. John’s Church (Grade II). The proposal would also ensure an appropriate response to the other designated heritage assets in the vicinity (refer to paragraph 5 above). Accordingly, the application complies with London Plan polices 7.1 and 7.8. and policies D1 and HC1 of the draft London Plan. In accordance with Policy D11 of the draft London Plan, the Council should secure an informative prescribing the submission of a fire statement, produced by a third party suitable qualified assessor, in consultation with the London Fire Brigade.
Inclusive access

32 The commitment to ensure equal and convenient access throughout the development is supported, and the proposed enhancements to on-site community facilities and provision of new public space and an east-west connection is welcomed in particular. The applicant has committed to a 10% provision of wheelchair accessible/adaptable homes, and has provided sufficient Blue Badge parking spaces to allow for a 1:1 provision of spaces to units. This is supported and the application accords with London Plan Policy 7.2 and Policy D3 in the draft London Plan.

Sustainable development

Energy strategy

33 In accordance with the principles of London Plan Policy 5.2 and Policy SI2 of the draft London Plan, the applicant has submitted an energy statement, setting out how the development proposes to reduce carbon dioxide emissions. In summary the proposed strategy comprises: energy efficiency measures (including a range of passive design features and demand reduction measures); a site heat network driven by combined heat and power plant; and, renewable technologies (comprising 500 sq.m. of photovoltaic panels). The approach proposed would achieve a 46% carbon dioxide reduction for the residential component of the scheme and a 15% reduction for the non-residential component. Whilst the principles of the energy strategy are supported, the applicant must explore the potential for additional measures to deliver further carbon dioxide reductions (particularly for the non-residential component). Once all opportunities for securing further feasible on-site savings have been exhausted, a carbon offset contribution should be secured to mitigate any residual shortfall.

Climate change adaptation

34 London Plan Policy 5.10 and Policy G5 of the draft London Plan seek the incorporation of new green infrastructure as part of development proposals, and London Plan policies 5.12 and 5.13 and policies SI12 and SI13 of the draft London Plan seek to reduce flood risk and secure sustainable urban drainage systems to reduce surface water runoff. The scheme includes various locations for soft landscaping; sedum roofs; and, permeable paving, as well as below ground rainwater storage to support urban greening and reduce surface water runoff rates in line with the Sustainable Design and Construction SPG. This is supported and the Council should secure detailed approval of sustainable drainage and urban greening measures by way of planning condition.

Transport

Public transport

35 A contribution of £25,000 is sought towards step free access enhancements for Harrow-on-the-Hill Station as mitigation in line with London Plan Policy 6.1 and Policy T3 of the draft London Plan.

Car parking

36 The proposal includes 62 residential parking spaces, which equates to 0.4 spaces per unit (consistent with the extant permission at the site). However, noting the high public transport access level, and in the interests of encouraging mode shift away from car use, a reduction is encouraged in response to London Plan Policy 6.13, Policy T6 of the draft London Plan and the
draft Mayor’s Transport Strategy. Notwithstanding this, the proposed like for like re-provision of 22 spaces for the community hall use is accepted.

37 The commitment to provide 20 on-site spaces for Blue Badge users is welcomed, as is the London Plan compliant provision of active and passive electric vehicle charging points (EVCP). Restriction of on-street parking permits for future residents should be secured by an appropriate legal mechanism, and Blue Badge and EVCP provision should be secured by way of planning condition in line with London Plan Policy 6.13 and Policy T6 of the draft London Plan.

**Cycling and walking**

38 The development includes a new pedestrian link through the site between Sheepcote Road and St John’s Road. This is welcomed. It is nevertheless understood that as part of the site security strategy this route may be gated off late at night, for use by residents only. GLA officers seek to achieve the optimum balance between public access and security having regard to the advice of the Metropolitan Police, in line with draft London Plan Policy D10. Further to this, and to promote active travel and improved permeability, a planning condition/obligation should be secured to ensure this route would remain open to the public for as long as is practically possible in line with London Plan Policy 6.10 and Policy T2 of the draft London Plan.

39 In line with pre-application advice the applicant has undertaken pedestrian and cycling environment audits. The submitted findings have identified that some local routes/links are in need of improvement. The Council is strongly encouraged to secure an appropriate contribution towards delivering associated improvements accordingly in line with London Plan policies 6.9 and 6.10 and policies T2 and T5 of the draft London Plan. The need for a contribution to deliver ‘Legible London’ (or similar) wayfinding signage should also be considered by the Council in line with London Plan Policy 6.10 and Policy T2 of the draft London Plan.

40 The proposal includes 341 cycle spaces for the residents, including 18 larger spaces at the basement, and 8 spaces for the community use. This meets the minimum London Plan standards and is supported in line with London Plan Policy 6.10 and Policy T5 of the draft London Plan.

**Travel planning**

41 The current travel plan overlooks the potential for cycle trips associated with the proposal. Given existing and proposed cycle provision in the area, and in the context of the draft Mayor’s Transport Strategy, GLA officers expect cycling to be a well-used mode of transport within the scheme. The travel plan should be updated to reflect this, and to include ambitious targets to promote mode shift towards active travel in line with London Plan Policy 6.3 and Policy T4 of the draft London Plan. Approval and implementation of the revised travel plan should be appropriately secured as part of any planning consent.

**Servicing and construction**

42 A delivery and servicing plan (DSP) has been submitted. The proposed servicing arrangements are acceptable, and the DSP, in conjunction with a construction logistics plan, should be secured for detailed approval by way of planning condition in line with London Plan Policy 6.14 and Policy T7 of the draft London Plan.
Local planning authority’s position

Harrow Council is expected to formally consider the application at a planning committee meeting on 14 December 2017.

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 and draft London Plan policies on Opportunity Area, social infrastructure, housing, urban design, inclusive access, sustainable development and transport are relevant to this application. Whilst the scheme is broadly supported in strategic planning terms, the application does not yet fully comply with the London Plan and draft London Plan as set out below:

- **Opportunity Area**: The comprehensive residential-led mixed use redevelopment of this highly accessible town centre site is strongly supported in line with London Plan policies 2.13 and 3.3, and policies SD1 and H1 of the draft London Plan.

- **Social infrastructure**: The proposed provision of enhanced community space as part of this comprehensive redevelopment is strongly supported in line with London Plan Policy 3.16 and Policy S1 of the draft London Plan.

- **Housing**: The proposed affordable housing offer (42% with grant) has been independently verified as the maximum level subject to early and late stage review mechanisms in line with London Plan Policy 3.12, the Mayor’s Affordable Housing and Viability SPG and policies H5 and H6 of the draft London Plan.

- **Urban design**: The proposed design and public realm provision is supported in line with London Plan policies 7.1 and 7.8 and policies D1 and HC1 of the draft London Plan.

- **Inclusive access**: The proposed response to access and inclusion is supported in line with London Plan Policy 7.2 and Policy D3 of the draft London Plan.
• **Sustainable development**: The proposed energy strategy and climate change adaptation measures are broadly supported in strategic planning terms. Once all opportunities to secure further feasible on-site carbon dioxide savings have been exhausted, a carbon offset contribution must be secured to mitigate any residual shortfall. The Council must secure the associated energy strategy and climate change adaptation details by way of planning condition in accordance with London Plan policies 5.2, 5.10, 5.12 and 5.13 and policies S12, S112 and S113 of the draft London Plan.

• **Transport**: Whilst the scheme is generally acceptable in strategic transport terms, issues with respect to: public transport; car parking; cycling and walking; travel planning; and, servicing and construction should be addressed in line with London Plan policies 6.1, 6.3, 6.9, 6.10, 6.13 and 6.14 and policies T2, T3, T4, T5, T6 and T7 of the draft London Plan.