

18 February 2015

Alpha Square, Isle of Dogs**in the London Borough of Tower Hamlets****planning application no. PA/14/03281****Strategic planning application stage 1 referral**

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

The proposal

Demolition of all existing buildings, and erection of two buildings of up to 32 and 63-storeys, comprising 727 residential units and a 273-bedroom hotel, together with a two-form entry primary school, replacement healthcare facilities, ground-floor commercial floorspace, and basement parking, together with access, servicing, and landscaping.

The applicant

The applicant is **Drakar Limited** on behalf of **Far East Consortium International Limited**, and the architect is **Pilbrow & Partners**.

Strategic issues

The principle of the redevelopment of this site for primarily housing together with hotel use is acceptable, and the provision of education infrastructure is strongly supported. However, there are a number of outstanding strategic planning concerns relating to **housing, urban design, climate change** and **transport** that must be addressed before the application can be considered acceptable in strategic planning terms.

Recommendation

That Tower Hamlets Council be advised that, whilst the principle of the redevelopment of this site is supported, the application does not comply with the London Plan, for the reasons set out in paragraph 88 of this report. However, the resolution of those issues could lead to the application becoming compliant with the London Plan.

Context

1 On 12 January 2015 the Mayor of London received documents from Tower Hamlets Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor has until 20 February 2015 to provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

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

- **Category 1A:** *“Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats”.*
- **Category 1B:** *“Development (other than development which only comprises the provision of houses, flats, or houses and flats), which comprises or includes the erection of a building or buildings outside Central London and with a total floorspace of more than 15,000 sq.m.”.*
- **Category 1C:** *“Development which comprises or includes the erection of a building more than thirty metres high and outside the City of London”.*

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

4 The environmental information for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 has been taken into account in the consideration of this case.

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

Site description

6 The 0.4 hectare site is located on Marsh Wall, Manilla Street and Byng Street, within the South Quay area immediately to the south of Canary Wharf, on the Isle of Dogs. The application site is split into two development parcels, separated by Manilla Street, which cuts through the site on a north-south orientation. The western section of the site comprises a parcel of land bound by Manilla Street to the north and east, industrial units to the south, and residential properties to the west, and currently comprises low-rise industrial units with an area of parking. This section of the site includes a three-storey public house, which falls outside of the red line boundary, but forms part of the existing urban block.

7 The eastern section of the site, which currently comprises low-scale industrial buildings, a single-storey private healthcare centre, and an area of locally designated open space, is bound by Marsh Wall to the north, Manilla Street to the west, Byng Street to the south, and a three-storey office building with hard surface car-parking to east. At the time of writing this report, the site immediately to the east is the subject of a strategic planning application for a linked 29 and 39-storey building, comprising 240 residential units (our ref: D&P/2910/01). This section of the site also includes a set of steps linking Manilla Street to Byng Street.

8 All roads surrounding the site are part of the borough highway network. The nearest section of the Transport for London Network is the Limehouse Link, 850 metres to the north-east of the site. Canary Wharf underground station is located 760 metres to the north, and provides access to Jubilee line services. South Quay (500 metres to the east), Heron Quays (400 metres to the north) and Canary Wharf (650 metres to the north) all provide access to Docklands Light Railway (DLR) services on the Lewisham to Bank/Stratford branch. From 2019, Crossrail will also serve this area from Canary Wharf station at West India Dock, approximately one kilometre to the north. Five bus services (D3, D7, D8, 135 and 277) operate within reasonable walking distance of this site. As such the site records a good public transport accessibility level (PTAL) of four.

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

Details of the proposal

10 Drakar Limited on behalf of Far East Consortium International Limited is seeking full planning permission for the demolition of all existing buildings, and the erection of two buildings, located either side of a redeveloped Manilla Street. The western building ranges in height from five to 32-storeys, and comprises a two-form entry primary school with community room, and 167 residential units. The eastern building ranges in height from twenty to 63-storeys and comprises 560 residential units, and a 273-bedroom hotel, together with a healthcare centre and ground-floor cafe/restaurant use. Manilla Street is proposed as a central square between both buildings, which features landscaped elements, although it will remain an operational street still in the control of the Council. At the northern end of Manilla Street a new stepped, and ramped, route through onto Marsh Wall is proposed.

Case history

11 The application considered here was subject to formal pre-planning application discussions with GLA officers, with four meetings being held on 10 September 2014, 19 September 2014, 29 September 2014 and 13 October 2014. A pre-planning presentation to the Mayor and Deputy Mayor for Planning was also held on 22 October 2014. GLA officers welcomed the opportunity to proactively engage with the applicant at an early stage in the development process, which resulted in significant scheme developments. The principle of the housing-led redevelopment of this site, which includes education provision and a hotel, was strongly supported. However, a number of concerns were raised regarding housing, urban design, sustainable development, and transport.

12 The Council is in the process of producing a Supplementary Planning Document for the South Quay area to address issues arising from the scale of development proposed, including the provision of social infrastructure, and GLA officers have been closely involved in its preparation. This site sits within the indicative boundary of the emerging Supplementary Planning Document. The masterplan was out for public consultation from 5 January 2015 until 16 February 2015.

Strategic planning issues and relevant policies and guidance

13 The relevant issues and corresponding policies are as follows:

- | | |
|------------------------|---|
| • Housing | <i>London Plan; Housing SPG; Housing Strategy; draft Revised Housing Strategy; Shaping Neighbourhoods: Play and Informal Recreation SPG; Shaping Neighbourhoods: Character and Context, draft SPG</i> |
| • Affordable housing | <i>London Plan; Housing SPG; Housing Strategy; draft Revised Housing Strategy</i> |
| • Density | <i>London Plan; Housing SPG</i> |
| • Urban design | <i>London Plan; Shaping Neighbourhoods: Character and Context, draft SPG; Housing SPG; London Housing Design Guide; Shaping Neighbourhoods: Play and Informal Recreation SPG</i> |
| • Tall buildings/views | <i>London Plan; London View Management Framework SPG</i> |
| • Historic Environment | <i>London Plan; World Heritage Sites SPG; Circular 07/09</i> |

- Access *London Plan; Draft Accessible London: achieving an inclusive environment SPG*
- Blue Ribbon Network *London Plan*
- Sustainable development *London Plan; Sustainable Design and Construction SPG; Mayor's Climate Change Adaptation Strategy; Mayor's Climate Change Mitigation and Energy Strategy; Mayor's Water Strategy*
- Transport *London Plan; the Mayor's Transport Strategy*
- Parking *London Plan; the Mayor's Transport Strategy*

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

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

Principle of development

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

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

Employment floorspace

18 The existing buildings provide a total of 2,137 sq.m. of floorspace currently in light industry and storage use (Class B1(c) and B8), which is not proposed to be reprovided as part of this application. Whilst the London Plan seeks a rigorous approach to industrial land management, the existing site is not identified at the strategic or local level for industrial use. Furthermore, as set out above, London Plan Policy 2.13 (and supporting Table A1.1), makes clear that there is scope to convert surplus business capacity south of Canary Wharf. In this context the loss of a small quantum of employment floorspace as part of this application is acceptable in strategic planning terms. It should also be noted that a number of employment generating uses will be created on site including through the hotel, cafe, school, and health centre.

Hotel provision

19 London Plan Policy 4.5 encourages the provision of visitor accommodation within the Central Activities Zone and London's Opportunity Areas, in areas with good public transport accessibility to central London. The provision of a 273-bedroom hotel is therefore acceptable in accordance with strategic policy. The applicant has confirmed that 10% of the rooms will be accessible, and that an access management plan will be established. Both of these requirements should be secured by the Council as part of any future grant of planning permission.

Housing

20 London Plan Policy 3.3 provides explicit strategic support for the provision of housing within London. The draft Further Alterations to the London Plan sets a target for the Council to deliver a minimum of 39,314 homes in the Plan period 2015-2025. London Plan Policy 2.13 (and supporting Table A1.1) recognises the significant potential of the Isle of Dogs Opportunity Area to accommodate new homes, and identifies a minimum of 10,000 new homes. Given the site's context within the Isle of Dogs Opportunity Area, and the strategic priority afforded to housing, the principle of the housing-led redevelopment of this site, to include 727 new homes, is therefore supported.

School infrastructure

21 As set out in the draft Further Alterations to the London Plan, more effective coordination of social infrastructure, especially schools to support growing local needs, is required within the Isle of Dogs Opportunity Area. The need to ensure adequate social infrastructure is also identified in the Council's draft South Quay Masterplan SPD. Furthermore, London Plan Policy 3.18 makes clear that the Mayor will support provision of childcare, primary and secondary school, and further and higher education facilities adequate to meet the demands of a growing and changing population, particularly where these can be co-located with housing in order to maximise land-use and reduce costs.

22 The application includes a two-form entry state-maintained primary school that will accommodate up to 420 pupils. The school hall has been designed so as to allow for community use outside of school hours, and includes kitchenette and bathrooms, together with independent access. The inclusion of a new primary school as part of this application, with dual-use of its facilities by the community, is strongly supported in accordance with London Plan Policy 3.18.

Open space

23 London Plan Policy 7.18 resists the loss of locally protected open space. The Council, in its Development Management Policies Development Plan Document, states that development on open space will only be allowed in exceptional circumstances where, as part of a wider development proposal, there is an increase of open space and a higher quality open space outcome is achieved.

24 The application site includes a 287.3 sq.m. area of land that the Council has stated is designated as open space in the Council's Open Space Strategy, known as Wayside Gardens, although this site is not listed within that document. The land is fenced off and existing vegetation is heavily overgrown; consequently it is neither visibly nor physically accessible. The application proposes the loss of this area of open space.

25 The loss of open space is contrary to strategic and local policy. Furthermore, it is important to note that, as set out in the Council's draft South Quay Masterplan SPD, given the significant potential for substantial change within the Isle of Dogs, it is vital that sufficient publicly accessible open space is provided as part of all development proposals. In this context the loss of this area of

open space without the generous re-provision of publicly accessible open space, to include additional provision to serve the development itself, would not be acceptable.

26 The application includes the provision of public realm in the form of a piazza located between the two buildings dissected by Manilla Street, and an eleven metre landscaped staircase linking Byng Street and Marsh Wall. The provision of a legible and fully-accessible pedestrian route linking Byng Street and Marsh Wall is strongly supported in accordance with the principles of the draft South Quay Masterplan SPD, and will deliver demonstrable benefits to permeability within the South Quay area. The provision of ground-floor publicly accessible open space in the form of the proposed piazza is also supported.

27 The provision of improved connectivity, and a publicly accessible ground-floor piazza space, accords with the principles of the draft South Quay Masterplan SPD, and will deliver an increase in the quantum of open space against that currently provided on site. In this context, the proposal could deliver both quantitative and qualitative improvements to open space provision to off-set the loss of locally designated open space, and to meet the additional need arising from the development. However, the applicant should note comments made regarding the design of these spaces in paragraphs 49-51 of this report before the proposal can be considered acceptable with regards to open space provision.

Health infrastructure

28 London Plan Policy 3.16 seeks to protect healthcare facilities. The site currently includes a 464.5 sq.m. healthcare centre, run by a private operator. The application includes the provision of a 325 sq.m. healthcare centre, designed as an NHS operated facility capable of accommodating two General Practitioners. Whilst the proposal therefore results in a loss in healthcare floorspace, it is acknowledged that, as an NHS operated centre, the replacement provision will be capable of meeting the full range of community needs. In this context, the proposal is acceptable, subject to the Council appropriately securing the facility as part of any future grant of planning permission.

Supporting uses

29 The application includes the provision of a retail unit set within the base of the eastern tower and fronting the proposed Alpha Square piazza. The proposed hotel also includes a bar and restaurant located on the ground and lower ground-floors. In accordance with London Plan Policy 4.7, it is vital that large-scale retail be appropriately focused within the Isle of Dogs town centre network. However, the provision of a small-scale mix of uses as part of high-density development within Opportunity Areas can help to meet the needs of local residents, and also assist in activating the ground-floor. The inclusion of retail, bar and restaurant space as part of this development is of an appropriate scale to be ancillary to the residential and hotel uses, provides active uses at ground-floor, and is therefore supported in accordance with London Plan policy.

Need for comprehensive development

30 London Plan policies encourage development proposals to take account of, and interact with, their immediate surroundings. London Plan Policy 7.1 requires development to be designed so that the layout, tenure and mix of uses interface with surrounding land, and Policy 3.7 seeks to ensure that the development of sites delivering substantial quantities of housing are co-ordinated. The application boundary excludes, but immediately abuts, the existing North Pole public house. It is understood that an application for the redevelopment of that building has been submitted to the Council but does not trigger a referral to the Mayor under The Town & Country Planning (Mayor of London) Order 2008. There is strategic concern raised by the piecemeal redevelopment of this site, and as such both applicants are strongly encouraged to deliver a comprehensive redevelopment proposal. Should this not be feasible, as a minimum, it is critical that the applicant demonstrate how

its proposal relates to the adjacent site, including improved visualisations of this important relationship, particularly focusing on the need to deliver quality public realm and an active ground-floor. This issue is discussed further in paragraph 50 below.

Summary

31 As set out above, given the site's context within the Isle of Dogs Opportunity Area, and the strategic priority afforded to housing, the principle of the housing-led redevelopment of this site is supported, and the re-provision of the existing healthcare centre, together with a hotel, and ancillary retail provision, are acceptable in accordance with strategic policy.

32 The application includes the provision of a state-maintained primary school. This will ensure the delivery of key infrastructure within the Isle of Dogs, responds positively to strategic requirements and the priorities of the Council's draft South Quay Masterplan SPD, and as such is strongly supported. Whilst the principle of the provision of quantitative and qualitative improvements to open space infrastructure to off-set the loss of locally designated open space, and to meet the needs arising from this development, is acceptable, the applicant should address comments made in this report regarding the design of the proposed public realm.

33 Finally, the applicant should provide additional information regarding the relationship of this proposal to the adjacent site, particularly in relation to the need to ensure the quality of the public realm and ground-floor environment.

Housing

34 The application includes 727 residential units. A detailed housing schedule is provided below:

unit type	market	affordable rent	intermediate	total
studio	187	0	0	187
one-bed	201	21	9	231
two-bed	162	31	26	219
three-bed	44	16	7	67
four-bed	7	16	0	23
total	601	84	42	727

Affordable housing

35 London Plan Policy 3.12 requires borough councils to seek the maximum reasonable amount of affordable housing when negotiating on individual private residential and mixed-use schemes. The proposal currently includes 126 affordable units, which represents 17% of overall housing provision (understood to be 25% when measured by habitable room). The applicant has submitted a financial viability report in support of its proposals, which is being independently assessed by the Council. It is therefore not possible at this stage to determine whether the application provides the maximum reasonable amount of affordable housing in accordance with London Plan Policy 3.12.

36 London Plan Policy 3.11 establishes a strategic target that 60% of affordable housing provision be for social housing (comprising affordable rent and social rent), and 40% for intermediate provision. The Council, in its Managing Development Document, requires proposals to provide affordable housing on a 70:30 social housing to intermediate housing split. The affordable

housing is currently split 67:33 when measured by units, which is in broad accordance with strategic and local policy, and is therefore acceptable.

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

Housing choice

38 London Plan Policy 3.8, together with the Mayor's Housing SPG, and the draft Revised Housing Strategy, seek to promote housing choice and a balanced mix of unit sizes in new developments. London Plan Policy 3.11 establishes that strategic priority be afforded to the provision of affordable family homes. The proposal includes ninety family units, equating to 12% of overall housing provision. In accordance with strategic policy, the applicant has prioritised family affordable provision, and as such 32 of the family units are identified as affordable, equating to 38% of total social housing provision.

39 The application includes 187 studio units, equating to 26% of overall housing provision and 31% of market housing provision. Whilst an element of studio provision may be acceptable, the applicant should note Paragraph 2.3.18 of the Mayor's Housing SPG which states that such units should be of exemplary design and be exceptional in the context of overall housing provision. The current proportion of studios cannot be considered exceptional in the context of overall housing provision, and should therefore be significantly reduced to better accord with the proportion secured on recent schemes within South Quay, where approximately 10% of units are studio. In addition to a reduction in quantum, further details regarding the quality of these units is also required to demonstrate how key factors relating to residential quality have been maximised, including orientation, floor-to-ceiling height, number of units per core, and flat layout.

Density

40 The density of the development is 4,252 habitable rooms per hectare. This is significantly above the London Plan guidance range of 650 to 1,100 habitable rooms per hectare for central sites with a public transport accessibility level of four, as set out in London Plan Policy 3.4.

41 Whilst there is not an in-principle objection to high-density developments, as set out in paragraph 17 of this report, there is strategic concern regarding the need to address potential barriers to the delivery of high density housing within the Isle of Dogs. The applicant should be mindful of the strategic priority, as established in Policy 3.4, that housing output be *optimised* taking into account, amongst others, the design principles of the London Plan, and take note of paragraph 1.3.41 of the Mayor's Housing Supplementary Planning Guidance with regard to high-density development, which states that "*Such proposals must also be assessed in terms of their bearing on the capacity of existing local amenities, infrastructure and services to support the development*". It is also important, as set out in the Mayor's SPG, that high density proposals be tested rigorously with regards to their contribution to local place shaping.

42 As set out in paragraphs 21 to 22 of this report, the application includes the provision of education facilities. The proposal also includes the delivery of a critical connection linking Byng Street and Marsh Wall. Whilst these elements of the application are strongly supported, and respond positively to the developments bearing on the capacity of existing infrastructure, the proposal does raise a number of outstanding strategic concerns in relation to proportion of studio units, residential quality, open space and play space provision, and urban design. As such, it is not possible to determine at this stage whether the proposal can be considered acceptable with regards to density.

Housing quality and design

43 London Plan Policy 3.5 promotes quality in new housing provision, with further guidance provided by the Mayor's Housing SPG. As set out in the Mayor's Housing SPG, proposals above the London Plan density matrix should be exemplary. Key factors such as floor-to-ceiling heights, orientation, maximising ground-floor individual access points, and number of units per core, are all essential to achieving high residential quality, and are of particular importance when assessing residential quality.

44 As detailed in the urban design section below, there are a number of concerns raised regarding residential quality which need to be addressed, particularly in relation to the number of units per core, and the proportion of north-facing single-aspect units. The applicant should also confirm that all units meet London Plan space standards and have at least a 2.6 metre floor-to-ceiling height.

Children's play space and amenity

45 London Plan Policy 3.6 seeks to ensure that development proposals include suitable provision for play and recreation. Further detail is provided in the Mayor's Shaping Neighbourhoods: Play and Informal Recreation Supplementary Planning Guidance. Using the methodology within the Mayor's SPG, the applicant has calculated that the development will be home to 160 children, 64 of which are expected to be under five years old. In accordance with the Mayor's SPG, the development will need to provide, as a minimum, 10 sq.m. of door-stop play provision for every child under-five, and identify facilities for older children.

46 Within the development a series of spaces are proposed, which are intended to provide play opportunities in addition to general residential amenity, with a total of 608 sq.m. currently identified for play provision. A further 1,612 sq.m. of ground-floor public realm is provided in the form of a piazza, in addition to the use of the school play facilities for residents and the community outside of school hours. The applicant also intends to provide a financial contribution towards off-site provision of play space for older children.

47 Given the majority of the children will reside in the western building, the applicant should disaggregate the play space provision, and child population, by block to demonstrate that sufficient space will be provided to meet the needs of those residents located within the affordable element. There is concern that the majority of private external play space is associated with the eastern building, and as such opportunities to explore the provision of additional private external play space as part of the western building should be explored, and any shortfall in provision fully addressed. At this stage, it is not therefore possible to determine whether the proposal is acceptable with regards to play space provision.

Urban design

48 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. Whilst many aspects of the scheme are generally well thought out, and the applicant has responded positively as part of the pre-planning application process, there remain a number of outstanding design concerns which should be addressed, as set out below.

Layout

49 The proposed layout creates a legible, safe and inviting route between Marsh Wall and Byng Street. This route is well activated on its eastern frontage by the health centre, cafe and entrance to the sky bar, and to the west by the school, community hall and the existing North Pole public house. The route opens up to become a public square in front of the school entrance and public house. This space is well defined and proportioned and will be used by a variety of users throughout the day and evening, which is welcomed. The detailed design of this space is critical to its success, particularly the need to provide pedestrian priority given the retention of Manilla Street for vehicular traffic. Whilst the need to maintain an appropriately open setting to the school entrance is also acknowledged, at this stage the design is overly restrained and muted. The detailed design should be developed further to provide opportunities for incidental play, and to encourage the gathering in, and enjoyment, of this piazza space. Innovative planting, seating and lighting together with a wider colour palette could elevate this space to a quality more commensurate with the scale of development it nestles between. Furthermore, there is concern that the current plans for the piazza include a set of steps positioned adjacent to the school and fronting the space. These steps considerably reduce the proportion of active frontage, and overly dominate this space, and as such should be reviewed.

50 Given the prominence of the existing public house within the site, and particularly within the proposed piazza, and in light of its potential impact on the success of the public realm delivered as part of this development, there are concerns that this element falls outside of the current red line boundary, as detailed in paragraph 30 of this report. Further concern is also raised by the current application to demolish this building, which holds considerable heritage value within South Quay. The retention of both the existing building, and its public house use, is integral to the overall success of the scheme, as it would provide a strong historical reference point, and would positively act as a defining characteristic for the area. As such, the applicant is strongly encouraged to work with the existing owner to bring forward a comprehensive development that retains this element. Should this not be possible, further details on the relationship of both the existing public house building, and the currently submitted building on that site, and the proposed public realm within this application is required in order to demonstrate that the space will benefit from good levels of activity and overlooking, and be of a suitable high quality commensurate with this scale of development.

51 At the northern end of this route the landscape steps and ramps up to Marsh Wall level. The approach of splitting the hotel and cafe floor level to create a mezzanine within the tower that seeks to address this changing level is welcomed. Whilst the route itself is generous, and has been increased in width and prominence through the pre-planning application process, the dominance of planting structures on the staircase causes concern, and is impacting on the legibility and prominence of the stepped route. The detailed design of this critical element of the proposal should therefore be reviewed and discussed further with GLA, TfL, and Council officers to ensure it will be legible and safe for all users.

52 At pre-application stage officers emphasised the importance of not undermining the quality of Byng Street with servicing and back of house uses. Whilst an effort has been made to wrap the health centre on to Byng Street, the extensive stretch of sub-station and loading bay frontage will have a significant detrimental impact on the quality of the public realm. The applicant should address this and seek to relocate either the substation or the loading bay elsewhere within the development to reduce the amount of contiguous inactive frontage along Byng Street. A similar issue is created with the location of the substation facing Manilla Street. Whilst officers understand the constraints relating to the relocation of substations, locating and orienting them to reduce the amount of contiguous poor frontage facing the public realm needs to be fully considered.

53 The quality of the frontage along Marsh Wall is welcomed. This is animated by the residential and hotel lobbies, which both create a simple and strong building line contributing to transforming the character of Marsh Wall into a good quality urban street, in accordance with the principles of the draft South Quay Masterplan SPD. However, the inclusion of a combined taxi and coach drop-off area intended to serve the hotel undermines this, creating a convoluted and cluttered public realm, which is a concern. The provision of a large canopy oversailing the footway also results in the footway feeling part of the foyer of the building, rather than being integral public realm, which is also a concern. The applicant is advised to address these issues and ensure the pedestrian experience along Marsh Wall is optimised and inherently public in nature.

Residential quality – eastern building

54 The residential quality of the scheme was discussed extensively at pre-application stage and officers welcome the subsequent reduction in floorplate to limit the number of units served by the core on each floor. However, the majority of the floors in the eastern building continue to exceed the number of recommended units set out in the Mayor's Housing SPG, resulting in a higher number of single-aspect units, and undermining the sense of ownership and belonging residents feel over each floor. Whilst deviations from this standard are at times acceptable if other aspects of residential quality are exceeded to compensate, the proposed number of floors where this occurs is excessive, and needs to be addressed through an amended floorplate.

55 Further concern is also raised regarding the provision of single-aspect studio units on the northern aspect. Their location on this aspect runs contrary to the need to minimise the number of north-facing single-aspect flats, as established in the Mayor's Housing SPG. The applicant is advised to address this by reducing the number of units on each floor, and ensuring that single aspect units are only located on the western or eastern elevations. The applicant should also note comments made in paragraph 39 of this report regarding the over provision of studio units.

56 The eastern building is approximately fifteen metres away at its closest point to the proposed tower on the adjacent 54 Marsh Wall site. Whilst it is acknowledged that the two proposed buildings do not face each other directly, the Council should ensure that its requirements regarding overlooking and privacy are appropriately addressed.

Residential quality – western building

57 The residential quality of the western block is high, with no more than five units on each floor, and a very high proportion of dual-aspect units, which is strongly supported. However, confirmation that all units meet the London Plan minimums space standards and provide at least 2.6 metre clear floor to ceiling heights (as a minimum) is required. This should also be confirmed in relation to the eastern building.

Architectural treatment

58 The appearance of the development is characterised by the distinctive profile of the eastern block and its glass and metal elevations. The hotel and western block follow the same language. Whilst this approach is generally supported, the quality of detailing and specification of materials will be critical to the appearance of the scheme, and the applicant is strongly encouraged to retain the same architects through to construction stage to ensure these will be of the highest quality. The applicant should also be aware that the proposed curtain-wall construction approach will present significant challenges to meeting London Plan energy efficiency requirements as set out in paragraph 66 of this report, and its design will need to respond to this.

Height and strategic views

59 The proposed development is high, at 64 storeys (213 metres AOD). Whilst this is significantly taller than the immediate contextual height, in particular the buildings to the west and south, given the rapidly changing context of the site, its proximity to the Canary Wharf tall building cluster, and its high accessibility, this height may be considered acceptable if all other aspects of the design are of a high-quality.

60 As set out in paragraph eight of this report, the buildings lies in a number of strategic views, as identified in the Mayor's London View Management Framework. The applicant has submitted a townscape, visual and built heritage impact assessment, which assess the impact of the development on all the views identified and listed in paragraph nine, in addition to an assessment of the impact on the setting of the Maritime Greenwich World Heritage Site. This assessment demonstrates that for all strategic views, whilst the proposed buildings are higher than the existing context, they are in keeping with the height of proposed buildings within the vicinity of the site, and will form part of an emerging cluster. The height of the development does not therefore raise strategic concern.

Blue Ribbon Network

61 A key infrastructure barrier to development capacity within the South Quay area is the lack of bridge provision across the dock linking key development sites to essential transport facilities at Canary Wharf. The need for improved bridge crossings is also a key element of the Council's Millennium Quarter Masterplan, and draft South Quay Masterplan SPD. The existing bridge experiences capacity problems at present, as detailed in the transport section below, and consequently the Council and GLA are committed to the provision of bridge improvements. Accordingly, it is expected that this proposal will contribute towards the delivery of improved bridge connectivity, and as detailed in paragraph 78, a financial contribution will be expected from this development to be ring-fenced for the purpose of bridge improvements.

Inclusive design

62 In accordance with London Plan Policy 3.8, the applicant has confirmed that all of the residential units will meet Lifetime Homes standards, and that 10% of the units will be capable of easy adaptation for wheelchair users, distributed across tenures and unit sizes. This requirement should be secured by the Council through condition. As detailed in paragraph 19 of this report, the Council should also secure the provision of 10% wheelchair accessible rooms within the hotel, and the submission of an access management plan, in accordance with London Plan Policy 4.5.

63 The provision of a fully accessible route linking Byng Street and Marsh Wall is fully supported in accordance with London Plan Policy 7.2. However, as detailed in paragraph 51 of this report, the design of this staircase needs to be further developed. It is critical as part of these discussions that the needs of all pedestrians are fully addressed.

Climate change - adaptation

64 In accordance with London Plan Policy 5.3, the applicant should submit a sustainability statement demonstrating that the proposal meets at least the Mayor's priority standards set out in the Mayor's Sustainable Design and Construction Supplementary Planning Guidance, and where possible the Mayor's best practice standards. Given the scale of the development, the waste management plan should include details on how recycling will be managed and promoted.

Climate change - mitigation

65 The applicant has broadly followed the London Plan energy hierarchy to reduce carbon dioxide emissions. However, further revisions and additional information is required before the strategy can be assessed, and compliance with the London Plan verified.

Energy efficiency

66 A range of passive design features, and demand reduction measures, have been included to reduce the carbon dioxide emissions of the development. Both air permeability and heat loss parameters will be improved beyond the minimum backstop values required by building regulations. Other features include reduced mechanical ventilation with heat recovery, LED lighting and energy efficient controls, and variable speed drives. Further information should be provided on how the facade will be designed in order to verify that the targeted U-values, and thermal bridging parameters, will be achieved in practice, given curtain walling systems present limited opportunities for maximising energy efficiency. This should include relative proportions of glazed and insulated panel systems, and how heat losses around openings, and thermal bridges, will be addressed.

67 The demand for cooling will be minimised through brise soleil for external shading, solar control glazing, mechanical ventilation, and internal curtains. The applicant states that ambient air will be circulated through the building at night with combination high and low level windows within the building core producing cross flow ventilation, thus cooling the building fabric internally. However, the applicant should demonstrate how this will be achieved in the residential elements of the development where every dwelling is self-contained. Illustrations should also be provided to support the passive measures proposed.

68 The applicant has carried out preliminary overheating analysis on a south-facing dwelling and states that the passive measures proposed meet CIBSE criteria on limiting overheating risk. The applicant should also assess a west and east-facing unit, given these orientations are more difficult to treat for overheating risk via passive means.

69 Finally, sample DER and TER output sheets should be provided including energy efficiency measures alone in order to verify the savings reported.

District heating and renewables

70 The applicant has liaised with EDF, the operator of the Barkentine district heating network, which is located within the vicinity of the development, to explore a possible connection. Whilst it is understood that the current Barkentine network has limited excess capacity, and is not being extended, EDF may be interested in becoming the ESCo for a CHP system on-site, together with others in the area, with a view to eventually connecting them to the existing network, and consequently increasing capacity, and geographical coverage of the network. The applicant should continue to engage with both EDF and the Council, and provide evidence of correspondence to ensure that a coordinated approach is prioritised, and taken forward.

71 The applicant is proposing to install a site-wide heat-network, with gas fired CHP unit as the lead heat source, to be served by a single energy centre. This network should be designed so as to allow future connection to a district heating network, and should serve all residential units and all non-domestic uses; both of these requirements should be secured by the Council. The applicant should provide further information on the proposed sizing of the CHP unit and its installed capacity given the lack of clarity within the energy statement, including monthly load profiles, proportion of loads to be met by the CHP, and likely running hours.

72 The applicant has investigated the feasibility of a range of renewable energy technologies and is proposing to install solar photovoltaic panels on the roof of the tallest element. Given the lack of clarity within the energy statement, the applicant should confirm the extent of the proposed installation, including the quantum and installed capacity.

Summary

73 It is not possible to determine at this stage whether the proposal accords with London Plan energy policies. Further information on energy efficiency, overheating, and cooling is required. The applicant should continue to prioritise a future connection with Barkentine heat-network, and commit to delivering a site-wide heat network linking all uses and buildings. Further information is required regarding the CHP sizing, and the photovoltaic panel array. Finally, the Council should appropriately secure the final agreed energy strategy, and specifically the connection to Barkentine, and the delivery of a site-wide heat-network.

Transport

Car parking, deliveries and access

74 The proposal includes 27 car spaces; including four blue badge spaces and five spaces for the hotel. Overall, the residential parking ratio will be 0.03. TfL supports this restrained approach as it will help to minimise additional vehicular trips in this area. The applicant has also committed to meeting London Plan standards on electric vehicle charging points, which is welcomed. Given the very low level of residential parking, the applicant should also identify a suitable location for an additional car club space. The proposals should be subject to a permit free agreement, secured through the section 106 agreement.

75 The proposals also include one taxi and coach parking/drop-off area on Marsh Wall. TfL is concerned that given the limitations of manoeuvring a coach, its location could disrupt the safe operation of the eastbound bus stop opposite, as well as encroach upon the footway. Concerns have also been raised in paragraph 53 of this report regarding this drop off area. Further discussion about this element is therefore required with TfL and GLA officers. Similarly, the lack of adequate on-site servicing could give rise to pedestrian/vehicle and cyclist/vehicle conflicts in Manilla Street and Byng Street, particularly in the context of a proposed primary school, as well as increasing localised highway congestion.

Trip rate and modal split

76 The trip rate and mode split assessment within the transport assessment is generally reasonable, and therefore accepted. The Council should nonetheless note that the applicant has assessed all trips against an evening peak period of 18.00 to 19.00, which will not capture school traffic.

Public transport

77 The cumulative impact of bus trips from this development, and others nearby, will require additional bus capacity to be provided, as many routes in this area are already at capacity. A contribution of £200,000 is therefore requested to be secured through the s106 agreement for enhancements to bus services. TfL also encourages the applicant to provide real time information screens within the main building cores.

78 The transport assessment predicts an additional 125 two-way trips on the DLR during the morning peak. TfL notes that the section between South Quay and Canary Wharf is already one of the busiest on the DLR, and this is expected to become more congested with the cumulative impact of new development in this area. However such demand could be reduced by overcoming some of the pedestrian and cycle severance caused by the dock areas. TfL also notes from recent assessment that the existing South Quay footbridge is already uncomfortably crowded in the morning peak period. TfL and Tower Hamlets Council have therefore identified the need for bridge improvements, to include at least one additional pedestrian and cycle bridge link in this area, and contributions have already been secured from other nearby developments towards their implementation. The Council is therefore expected to secure a comparable sum from this development. TfL welcomes further discussion about this matter.

Cycling and walking

79 The development will include a total of 1,223 cycle parking spaces in line with the Further Alterations to the London Plan standards, which is welcomed. However, the applicant must address the layout and design of the scheme to provide cycle lifts, and ensure that cyclists and pedestrians are segregated when entering the basement areas. The Council should also secure an appropriate contribution to ensure that this development can be linked into local cycling infrastructure.

80 TfL welcomes the submission of a pedestrian (PERS) audit, and the improvements it identifies as necessary. Those that are agreed with the Council should be appropriately secured through the section 106 or 278 agreement as appropriate. The applicant also proposes a zig-zag stair-ramp arrangement to replace the existing stairs to Marsh Wall. This is welcomed in principle for increasing accessibility to pedestrians and dismounted cyclists with the wider area, although the applicant should note comments made in paragraph 51 of this report. Detailed matters relating to its design and implementation should be resolved with the Council and the GLA. The applicant should also contribute towards improved wayfinding in this area through Legible London signage.

Construction and travel planning

81 The submission of framework construction plan is welcomed in principle, although it should be developed further to refer to the intended phasing of the development. Similarly, the content of the submitted framework travel plan should be revised to comply with TfL's guidance. All of these plans, as well as a school travel plan, should be secured and monitored by the Council through the section 106 agreement.

Community Infrastructure Planning

82 The site is located within the Isle of Dogs charging area where section 106 contributions for Crossrail will be sought in accordance with London Plan Policy 6.5 and the Mayor's guidance 'Use of planning obligations in the funding of Crossrail, and the Mayoral Community Infrastructure Levy' SPG (2013). The rate for hotels is £84 per square metre GIA which would generate a contribution of £802,956.

83 The Mayor has also introduced a London-wide Community Infrastructure Levy (CIL) to help implement the London Plan, particularly policies 6.5 and 8.3 toward the funding of Crossrail. The rate for the borough of Tower Hamlets is £35 per square metre. The applicant should note that the Mayor's CIL charge will be treated as a credit towards the section 106 liability referred to above and therefore only the larger of the two amounts will normally be sought. Notwithstanding this, the Council must identify the full Crossrail sum within the section 106 agreement.

Summary

84 To summarise, TfL is concerned with the cumulative impact of development within the South Quay area on the local transport and highway network. Additional dock crossing points have been identified by the GLA, TfL and the Council as a critical intervention in assisting in alleviating the pressures on the DLR, bus network and existing South Quay footbridge and a contribution is sought towards both their delivery, and an increase in local bus, and cycle infrastructure. Further discussion is also required regarding servicing and drop-off facilities, cycle layout and design, and the construction management plan. The framework travel plan, a school travel plan, and the final agreed construction management plan should all be secured and monitored by the Council through the section 106 agreement.

Local planning authority's position

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

Legal considerations

86 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

87 There are no financial considerations at this stage.

Conclusion

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

- **Principle of development:** the principle of the housing-led redevelopment of this site, to include the provision of a two-form entry primary school and the reprovision of the existing healthcare centre, together with a hotel, and ancillary retail provision, is acceptable in accordance with strategic policy. However, at this stage it is not possible to determine whether the application is acceptable with regards to London Plan Policy 7.18 in relation to the loss of the existing area of designated open space, and as such the comments made regarding the nature and design of the public realm and staircase should be addressed. The comprehensive redevelopment of this site with the existing public house is also strongly encouraged in accordance with London Plan policies. Should this not be possible, as a minimum the applicant should provide additional information regarding the relationship of

this proposal to the adjacent site, particularly in relation to the need to ensure the quality of the public realm and ground-floor environment.

- **Housing:** it is not possible at this stage to determine whether the proposal provides the maximum reasonable amount of affordable housing, in accordance with London Plan Policy 3.12. The proportion of studio units should be significantly reduced, and further information submitted on their design, to ensure compliance with London Plan policies 3.5 and 3.8. The applicant should also disaggregate the overall provision of play space, and child population, by each building in order to demonstrate that sufficient space is provided to meet the needs of the affordable element, in accordance with London Plan Policy 3.6. Finally, in light of the outstanding issues detailed in this report, particularly relating to housing mix, residential quality, open space and play space provision and urban design, it is not possible at this stage to determine whether the density of the proposal is acceptable, and therefore whether the proposal accords with London Plan Policy 3.4.
- **Urban design:** a number of concerns are raised regarding ground-floor layout and design of public open space and permeability, in addition to residential quality, and as such the proposal does not accord with London Plan policies 3.5, 7.3 and 7.5. The applicant should also address comments made in this report regarding the adjacent public house.
- **Blue Ribbon Network:** the applicant should engage with the Council, GLA and TfL regarding securing a financial contribution towards provision of improved bridge connectivity over the dock in order to address infrastructure barriers.
- **Climate change adaptation:** in accordance with London Plan Policy 5.3, the applicant should submit a sustainability statement demonstrating that the proposal meets at least the Mayor's priority standards set out in the Mayor's Sustainable Design and Construction Supplementary Planning Guidance, and where possible the Mayor's best practice standards.
- **Climate change mitigation:** the energy strategy does not accord with London Plan policies 5.2, 5.6, 5.7 and 5.9. It is not possible to determine at this stage whether the proposal accords with London Plan energy policies. Further information on energy efficiency, overheating, and cooling is required. The applicant should continue to prioritise a future connection with Barkentine heat-network, and commit to delivering a site-wide heat network linking all uses and buildings. Further information is required regarding the CHP sizing, and the photovoltaic panel array. Finally, the Council should appropriately secure the final agreed energy strategy, and specifically the connection to Barkentine, and the delivery of a site-wide heat network.
- **Transport:** To summarise, TfL is concerned with the cumulative impact of development within the South Quay area on the local transport and highway network. Additional dock crossing points have been identified by the GLA, TfL and the Council as a critical intervention in assisting in alleviating the pressures on the DLR, bus network and existing South Quay footbridge and a contribution is sought towards both their delivery, and an increase in local bus, and cycle infrastructure. Further discussion is also required regarding servicing and drop-off facilities, cycle layout and design, and the construction management plan. The framework travel plan, a school travel plan, and the final agreed construction management plan should all be secured and monitored by the Council through the section 106 agreement.

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