

Poplar Business Park, 10 Preston's Road, Poplar

in the London Borough of Tower Hamlets

planning application no. PA/10/01866

Strategic planning application stage 1 referral (new powers)

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

The proposal

Full planning permission for redevelopment of site to provide a mixed-use scheme of between three and 31 storeys, comprising 312 residential units, office/light industrial floor space, a 91 bedroom hotel, restaurant, with associated parking and landscaping.

The applicant

The applicant is **Workspace Group PLC** and the architect is **Barton Willmore**.

Strategic issues

This **mixed-use** development in this highly accessible location, in close proximity to the Isle of Dogs **opportunity area** is acceptable in strategic planning policy terms, subject to further justification in relation to the appropriateness of this location for a **hotel**.

Whilst the principle of a **tall building** is acceptable, there are outstanding issues in relation to the **design** and **layout** of the proposal, the **residential quality** and the **density** of the scheme.

Outstanding issues also remain in relation to the **affordable housing** offer, the **dwelling mix**, **children's play space** and **inclusive design**.

Further information is also required in relation to **transport** and **energy** in order for the scheme to comply with London Plan policies. A **Crossrail** contribution will also be required.

Recommendation

That Tower Hamlets Council be advised that the application does not comply with the London Plan, for the reasons set out in paragraph 109 of this report; but that the possible remedies set out in paragraph 111 of this report could address these deficiencies.

Context

1 On 4 October 2010 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 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 ... 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 of one or more of the following descriptions... (c) the building is more than 30 metres high and is 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) (England and Wales) Regulations 1999 has been taken into account in the consideration of this case.

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

Site description

6 The site, known as Poplar Business Park, is 1.65 ha in size and is located to the north of the Isle of Dogs. It is bounded to the north by properties fronting Poplar High Street, the Docklands Light Railway (DLR) alignments to the south and west, and to the east, by the recently completed Wharfside South development and Preston's Road roundabout beyond that.

7 The site currently contains a series of office, workspace and light industrial units totalling approximately 7000 sq.m., in three two-storey warehouse style buildings that are owned and managed by the applicant.

8 The A1261 Aspen Way, which forms part of the Transport for London Road Network (TLRN) runs 100m to the south of the site, and is accessed from the Preston's Road Roundabout (although the roundabout itself is not part of the TLRN).

9 Blackwall DLR station lies 250m to the east of the site and bus routes 277, D6, D7 and D8 can be accessed within 100m at Trafalgar Way. The public transport accessibility level (PTAL) of the site is 4 (in a range of 1 to 6, where 6 is the most accessible).

Details of the proposal

10 Full planning permission is sought for redevelopment of the site to provide a mixed use scheme comprising the following:

- 7,057 sq.m. of office/light industrial floor space located in Blocks A3, A4, A5 and B1-B6;

- 312 residential units in Blocks A1-A4 and B1-B4;
- 91 bed hotel in Blocks C1 and C2 and the first four storeys of Block C3;
- restaurant - 211 sq.m.
- associated parking and landscaping.



Figure 1: Ground floor block plan (Source: submitted Planning Statement)

11 The building heights would range between three and 31 storeys, with the tallest element located in block C3. Block A3 would be 16-storeys and block A1 would be 12-storeys in height.

12 Parking for will be provided at ground floor level and within a semi-basement facility, comprising 110 car parking spaces, 12 motorcycle spaces and 396 cycle parking spaces.

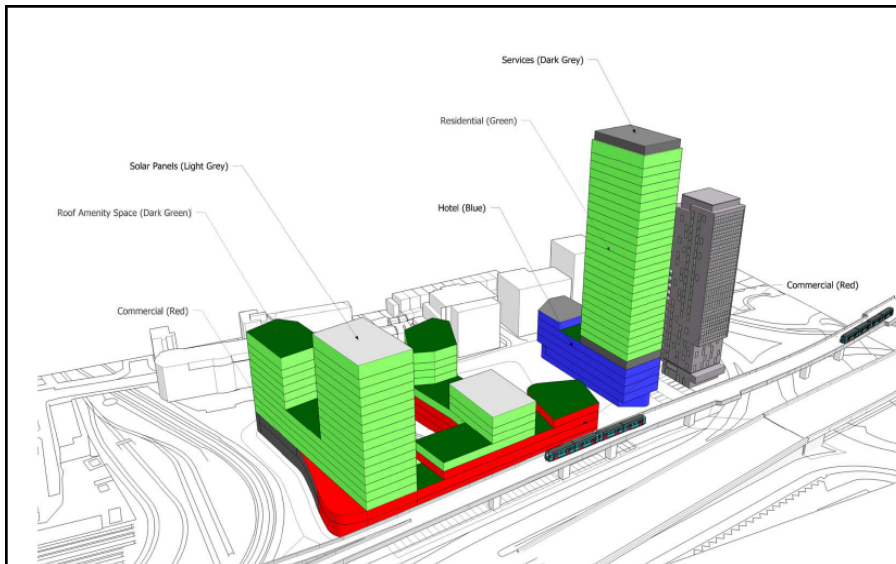


Figure 2: massing diagram with uses shown (Source: Submitted Design and Access Statement)

Case history

13 A pre-application meeting was held with GLA officers in March 2010 where the applicant was advised that the principle of a mixed-use redevelopment was acceptable in principle, together with the intention to improve linkages to and through the site. It was advised that further

clarification and information in relation to housing, design, inclusive access, energy and transport would be required in order for the scheme to accord with strategic planning guidance.

14 This aside, there is no planning history of a strategic nature relating to this site.

Strategic planning issues and relevant policies and guidance

15 The relevant issues and corresponding policies are as follows:

- Principle of use *London Plan; the Mayor's Economic Development Strategy*
- Retail/town centre uses *London Plan; PPG13, PPS4*
- Tourism/leisure *London Plan; Good Practice Guide on Planning for Tourism (DCLG)*
- Housing *London Plan; PPS3; Housing SPG; Providing for Children and Young People's Play and Informal Recreation SPG, Housing Strategy; Interim Housing SPG; Housing SPG EIP draft*
- Affordable housing *London Plan; PPS3; Housing SPG, Housing Strategy; Interim Housing SPG; Housing SPG EIP draft*
- Density *London Plan; PPS3; Housing SPG; Interim Housing SPG; Housing SPG EIP draft*
- Tall buildings/views *London Plan; RPG3A, Revised View Management Framework SPG*
- Urban design *London Plan; PPS1*
- Children's play space *London Plan; Providing for Children and Young People's Play and Informal Recreation SPG*
- Inclusive design and access *London Plan; PPS1; Accessible London: achieving an inclusive environment SPG; Planning and Access for Disabled People: a good practice guide (ODPM)*
- Ambient noise *London Plan; the Mayor's Ambient Noise Strategy; PPG24*
- Sustainable development *London Plan; PPS1, PPS1 supplement; PPS3; PPG13; PPS22; draft PPS Planning for a Low Carbon Future in a Changing Climate; the Mayor's Energy Strategy; Mayor's draft Climate Change Mitigation and Adaptation Strategies; Mayor's draft Water Strategy; Sustainable Design and Construction SPG*
- River Thames/flooding *London Plan; Mayor's draft Water Strategy; PPS25, RPG3B*
- Transport and parking *London Plan; the Mayor's Transport Strategy; PPG13;*
- Crossrail *London Plan Alteration; Crossrail SPG*

16 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 Tower Hamlets Unitary Development Plan 1998, the Tower Hamlets Core Strategy (adopted September 2010) and the London Plan (Consolidated with Alterations since 2004).

17 The draft replacement London Plan, which was released for consultation on 12 October 2009, is also a material consideration, as is the 2007 Lower Lea Valley Opportunity Area Planning Framework (LLV OAPF).

Principle of use

18 The site, which is in light industrial and business use, sits to the north of the Isle of Dogs Opportunity Area. Whilst the London Plan does not identify the site as being strategically important industrial land, the site is identified as a 'Local Industrial Centre' and as such, there is an assumption that the continuing use of the site for industrial and business areas should be the first priority.

19 The scheme proposes a significant intensification of use, with the re-provision of the existing levels of employment floor space, and provision of hotel and residential uses. Noting the proximity of the Isle of Dogs Opportunity Area, the optimisation of residential and non-residential densities is supported in principle.

20 In light of the site layout, density and proposed uses, it will be important for the amenity impacts of the scheme to be carefully considered by the Council, given the level of work space proposed with residential above it. It will be important for appropriately worded conditions to be imposed, which would protect the amenities of future residents without undermining or restricting the operation of the commercial uses.

Hotel

21 In terms of the suitability of the site for a hotel use, policy 3D.7 of the London Plan, and policy 4.5 of the draft replacement London Plan state that beyond the Central Activities Zone (CAZ) such uses should be focussed in town centres, Opportunity and Intensification Areas, where there is good public transport access. Policy 3D.7 specifically seeks to enhance the quality and appeal of London's tourism offer and achieve a target of 40,000 net additional hotel rooms by 2026.

22 Draft replacement London Plan policy 4.5 'London's visitor infrastructure' seeks to support London's visitor economy and stimulate its growth. It extends the timescale for provision of the additional 40,000 rooms to be delivered to 2031 and introduces the requirement to ensure that at least 10% of hotel rooms are wheelchair accessible.

23 The site is not located within the Central Activities Zone or a town centre, but it is close to several DLR stations as well being nearby to the Isle of Dogs Opportunity Area (on the opposite side of Aspen Way). The lack of street frontage does suggest this may not be an ideal location for such a use, however the proximity of other hotels and Canary Wharf, and the good public transport access is noted.

24 However this location is outside an area where the Council seeks to concentrate hotels, and consequently, it is understood that the Council did advise at pre-application stage that a justification for the hotel use will need to be provided and will be subject to a needs based assessment to prove economic sustainability in this location. In order to be satisfied that this is an appropriate location for a hotel, the views of the Council would be welcomed.

Housing

25 London Plan policy 3A.1 seeks to increase London's supply of housing and sets a London-wide target of 30,500 additional homes per year between 2007/8 and 2016/17. Table 3A.1 sets borough housing targets, of which Tower Hamlets' is 3,150 additional homes per year between 2007/8 and 2016/17. Draft replacement London Plan policy 3.3 seeks provision of at least an annual average of 33,400 additional homes across London up to 2015/16. Table 3.1 sets annual average housing provision monitoring targets for London boroughs, of which Tower Hamlets' is 2,885 units.

26 The proposed development includes 312 residential units, which represents 10% of the borough's existing annual homes target and 11% of its draft replacement London Plan target. This is welcomed, in line with London Plan policy 3A.1 and draft replacement London Plan policy 3.3.

27 The residential accommodation is broken down as follows:

Table 1: Proposed housing mix

Unit Type	Unit Tenure			Total by Unit Type	Total by Unit Type (%)	Housing SPG
	Market	Affordable				
		Intermediate	Social			
Studios	0	0	0	0	0%	1%
1-bed	78	3	5	86	27.6%	31%
2-bed	122	9	10	141	45.2%	38%
3-bed	68	3	9	80	25.6%	
4-bed	0	0	3	3	1%	30%
5-bed	0	0	2	2	0.6%	
Total by Tenure	268	15	29	312	100%	100%
Total by Tenure (%)	86%	5%	9%	100%		
Tenure split		34%	66%			

Affordable housing

28 London Plan policy 3A.10 requires borough councils to seek the maximum reasonable amount of affordable housing when negotiating on individual private residential and mix-use schemes. In doing so, each council should have regard to its own overall target for the amount of affordable housing provision. Policy 3A.9 states that such targets should be based on an assessment of regional and local housing need and a realistic assessment of supply, and should take account of the London Plan strategic target that 35% of housing should be social and 15% intermediate provision, and of the promotion of mixed and balanced communities. In addition, Policy 3A.10 encourages councils to have regard to the need to encourage rather than restrain residential development, and to the individual circumstances of the site. Targets should be applied flexibly, taking account of individual site costs, the availability of public subsidy and other scheme requirements.

29 Policy 3A.10 is supported by paragraph 3.52, which urges borough councils to take account of economic viability when estimating the appropriate amount of affordable provision. The 'Three Dragons' development control toolkit is recommended for this purpose. The results of a toolkit appraisal might need to be independently verified.

30 Where borough councils have not yet set overall targets as required by policy 3A.9, they should have regard to the overall London Plan targets. It may be appropriate to consider emerging policies, but the weight that can be attached to these will depend on the extent to which they have been consulted on or tested by public examination. In this instance, Tower Hamlets Council's Core Strategy has recently been adopted and seeks to deliver 43,275 new homes (equating to 2,885 per year) from 2010 to 2025, with an overall strategic target for affordable homes of 50% until 2025 by requiring 35 - 50% affordable homes on sites providing 10 new residential units or more (subject to viability).

31 The applicant states that 14% of the residential units will be affordable which is below both the targets set by the Council and the London Plan. At the time of writing, the applicant's financial viability report had yet to be received by officers, however the Council has advised that it would be independently verified by consultants to test its assertions. Consideration will need to be given to whether the applicant has presumed grant funding, engaged in discussion with any housing associations, and whether there are other financial obligations that may impact upon the offer. The results of the independent appraisal will inform the acceptability of the affordable housing offer, particularly in relation to the requirement of policy 3A.10 to deliver the maximum

reasonable amount of affordable housing. In this respect, further discussion and justification for the affordable housing offer is required before the application is reported back at Stage 2, and given the low level of provision and the length of the construction project (6 years up to 2019), it would be appropriate to consider the potential for review mechanisms in any section 106 agreement.

Tenure split

32 London Plan Policy 3A.9 states that affordable housing targets should be based on an assessment of regional and local housing need and a realistic assessment of supply, and should take account of the London Plan strategic target that within the affordable element 70% of housing should be social and 30% intermediate provision, and of the promotion of mixed and balanced communities. The policy makes reference to the promotion of mixed and balanced communities and paragraph 3.51 seeks an appropriate balance between social and intermediate housing, having regard to the circumstances of the area.

33 Policy 3.12 of the draft replacement London Plan states that within the 13,200 affordable homes per year target, the Mayor will, and boroughs and other partners should, seek to ensure that 60% is social housing and 40% is intermediate.

34 Within the proposed affordable housing, 66% of units would be social rented and 24% would be intermediate. In this instance, the proposed tenure split sits between the London Plan and draft replacement London Plan targets, and subject to the Council's view, the proposed tenure split may be acceptable.

Mix of units

35 London Plan Policy 3A.5 encourages a full range of housing choice. This is supported by the London Plan Housing Supplementary Planning Guidance, which seeks to secure family accommodation within residential schemes, particularly within the social rented sector, and sets strategic guidance for councils in assessing their local needs. Policy 3.12 of the draft replacement London Plan states that within affordable housing provision, priority should be accorded to family housing. Recent guidance is also set out in the London Plan Interim Housing Supplementary Planning Guidance (April 2010) and draft replacement London Plan policy 3.8, which seeks to widen housing choice. Also relevant is policy 1.1C of the London Housing Strategy, which sets a target for 42% of social rented homes to have three or more bedrooms.

36 As noted in table 1 above, the scheme is made up of approximately 28% 1-bed units, 70% 2/3 bed units, and less than 2% 4-bed units. The majority of the accommodation proposed in this scheme is one and two bed flats, with less than a quarter comprising 3-bed units, and only five 4/5-bed family units proposed.

37 It is acknowledged that the mixed-use nature of the scheme, and its density are such that a high proportion of 3-bed and 4-bed units could add pressure to the limited amenity and play space and may generate a need for additional amenity space, which would be difficult to design into the scheme in an acceptable manner. However, it is considered that there is a disproportionate amount of smaller units and no justification for the non-compliance with strategic policy guidance. In order to comply with the London Plan and Housing SPG, further discussion is required before the application is referred back at Stage 2, to establish to what extent the determined mix reflects local needs, together with confirmation from the Council's housing department that it is satisfied that the proposed unit mix will meet the needs of its residents.

Residential quality

38 The Mayor has recently published his interim Housing Design Guide and Housing SPG EIP draft. Aspects of this, notably the minimum space standards for dwellings, are also reflected in the draft replacement London Plan.

39 Many of the flats within the scheme have been laid out according to the Mayor's best practice principles, as defined within the London Housing Design Guide and emerging draft Housing SPG. The applicant has confirmed that all units would meet or exceed the minimum sizes set out in the design guide, and all residential uses will have access to private amenity space, through provision of balconies, winter gardens, and shared rooftop gardens. However, as requested a pre-application stage, a more detailed checklist against the guidance should be provided as to ensure that adequate storage space is provided for instance, in addition to layout and individual room sizes (not just overall unit sizes). These details should be provided before the application is reported back at Stage 2.

40 Furthermore, there are some areas within the scheme that would appear less desirable to residents, such as the central block containing single-aspect units with a long corridor, and solely north-facing units. Of concern is the presence of single-aspect dwellings on low floors directly above the light industrial uses, with an outlook onto the DLR viaduct, DLR depot (with sharply curved rails contributing to noise) and Aspen Way. While the noise assessment recognises that detrimental affects can be mitigated through appropriate facade design, these dwellings will provide a substandard outlook and living conditions when compared with the majority of dwellings in the scheme, and should have at least been designed to dual-aspect standards.

41 Elsewhere within the scheme, the applicant has given consideration to the residential experience, and which will be of a generally good standard. Notwithstanding the constrained site entrance, approaches to the building would be through landscaped areas, and residential core entrances would be legible. The environmental statement suggests that the microclimatic impact with respect to wind effects will be acceptable, which is welcomed. In terms of sunlight, noting the orientation, there will be some overshadowing of the amenity space, however as the sun moves through the sky the majority of the landscaped courtyard would receive sunlight. The exception is the south-western section which would receive little or no sunlight. Given this space provides amenity for single aspect residential units, it will be very important that appropriate materials and planting are secured to ensure that the quality of this space is assured.

Density

42 Policy 3A.3 of the London Plan aims to maximise the potential of a site taking account of local context, London Plan design principles and public transport capacity. Table 3A.2 of the London Plan provides a framework for assessing density based on habitable rooms and dwellings per hectare. The consultation draft replacement London Plan policy 3.4 and Table 3.2 moves away from 'maximise' to 'optimise' taking into account all those matters in existing policy but with greater emphasis on local context and the design principles set out in Chapter 7 of the draft plan.

43 The applicant has suggested that the density of the scheme is in the vicinity of 865 habitable rooms per hectare, although no details have been provided as to how this has been calculated. Furthermore, as set out in paragraph 3.35 of the Interim Housing SPG, in a mixed-use scheme such as this with the allocation and layout of uses that is proposed, a calculation of dwellings per hectare or habitable rooms per hectare is not an appropriate measure of density. On this basis, the applicant should provide details of the residential floor space to enable a net dwelling density calculation to be made, and if necessary (i.e. where the non-residential element makes up more than 35% of overall floor space), the plot ratio to be calculated.

44 Notwithstanding the results of the above analysis, it is acknowledged that the transport accessibility, town centre location and the built context could support a high-density development on the site, compatible with the design principles of Policy 4B.1. Compliance with other policies, particularly those relating to design quality, social infrastructure, open space and play space, is also necessary. As noted below, there are concerns in relation to the location of the tower and the design of the scheme generally.

45 In order for a high density to be acceptable, the application would need to be exemplary in all other respects and provide a high quality living environment (including adequate provision of amenity space, an appropriate level of affordable housing, a good mix of unit sizes, high quality design and resolution of all transport and climate change issues).

Tall buildings / views / conservation

46 London Plan policies 4B.8 and 4B.9, which relate to the specific design issues associated with tall and large-scale buildings, are of particular relevance to the proposed scheme. These policies set out specific additional design requirements for tall and large-scale buildings, which are defined as buildings that are significantly taller than their surroundings and/or have a significant impact on the skyline and are larger than the threshold sizes set for the referral of planning applications to the Mayor.

47 The impact of the development has been assessed from the strategic view from the General Wolfe viewpoint within Greenwich Park, as defined within the London View Management Framework. Although the proposed development would be visible, the tall building would have limited detrimental impacts on the panorama, given the emerging cluster of recently constructed and approved tall buildings around the site. In this respect the development is acceptable.

48 The applicant's views assessment also demonstrates the impact on the local townscape, and in this respect, the opinion of Tower Hamlets Council on the local impacts of the proposal would be welcomed in order to further inform the assessment. Of strategic significance is the impact on listed buildings. There would be limited impact on the closest listed buildings, as these are within the urban context with only limited views of the proposal. Of greater importance are the views from nearby churches, specifically All Saints Church (Grade II listed) and St Matthias (Grade II* listed, 17th century), both of which are surrounded by open ground from which clear views of the proposal can be gained. While views of the proposal from the latter will have limited detrimental impact, given the emerging tall building context, in views from the former, the tall building would appear as a solitary element above the roofline of the church, when viewed from East India Dock Road. Likewise, the buildings would appear in the background view of the front of the church, from Newby Place. While this is a detrimental impact, it is somewhat mitigated by the previously approved but not constructed scheme at 2 Trafalgar Place, which will have similar effects.

49 Officers have also taken into account the impacts of existing and proposed tall buildings from other dynamic views from East India Dock Road and Newby Place. The church would remain as the dominant foreground element in these views, but the background elements would become more developed; in several existing views, only trees and low townscape elements are visible. While the retention of the current background around the church would be preferable, given the extant approvals and existing buildings it would be difficult to argue that the setting and character of the church and its grounds are unreasonably affected by the scheme or its cumulative impact.



Figure 3: Outline of proposed development (green line) and other approved development (red lines) against All Saints Church, viewed from East India Dock Road. Source: Applicant's Townscape and Visual Impact Assessment.



Figure 4: View from Poplar Dock, with existing Wharfside Point building to right (Source: Submitted Townscape Assessment)

Urban design

50 Good design is central to all objectives of the London Plan and is specifically promoted by the policies contained within Chapter 4B which address both general design principles and specific design issues. London Plan Policy 4B.1 sets out a series of overarching design principles for development in London. Other design policies in this chapter and elsewhere in the London Plan include specific design requirements relating to maximising the potential of sites, the quality of new housing provision, tall and large-scale buildings, built heritage, views, and the Blue Ribbon Network. The draft replacement London Plan reinforces these principles, with new development required to have regard to its context, and reinforce or enhance the character, legibility and permeability of the neighbourhood (policy 7.1).

Layout, mass and scale

51 The design and access statement contains a detailed massing analysis that demonstrates a considered response to the layout and massing of buildings, illustrating a series of options. The

outcome of a series of buildings of different heights is supported, as there is potential for an interesting variation across the site. However the rationale for the location of the tallest building on the site is not clearly explained. In considering the submitted layout and visualisations, the proposed location, immediately adjacent to the existing tall building at Wharfside Point, results in the two buildings appearing crowded together.

52 Additionally, the immediate context within the area is an urban, rather than a central one – although the context south of Aspen Way and the DLR, which are both physical and social divisive elements, is different. As such, the local tall building context is one of isolated towers or separation between developments, and officers remain concerned that the proximity of the proposed tower to an existing tower would not only have a cumulative effect on the massing and appearance on both the proposed and the existing towers, but also contribute to negative conditions for residents within the existing tower.

53 The broad approach of stepping the scale up between development fronting Poplar High Street and the elevated DLR track and Aspen Way to the south is sound in townscape and residential amenity terms. The arrangement of the blocks to form a protective buffer to the DLR tracks and Aspen Way on the western and southern boundaries of the site is sensible given the noise, air quality and general residential amenity issues arising from this transport infrastructure.

54 Further to comments in paragraph 21, the provision of a hotel on the site is questioned, given that these uses normally benefit from road exposure and in this case, is in a relatively constrained location. Notwithstanding, it is acknowledged within the context of the site layout that the 'first' block in the site is the correct location for such, with the potential for minimal disturbance to other residents.

55 Access into the site is limited and the layout is sensible, given the constraints. A development of this density would normally be located with direct road access or set within a perimeter block form, and a 'backland' development with this level of density is highly unusual and raises concerns. However the applicant's attempt to improve access through the creation of a north-south route through the site, linking an Aspen Way crossing with Poplar High Street, is supported. Additionally the design has sought to treat both the Wharfside Point scheme and the current proposal as part of the same development, and this is appreciated. Additionally, although the density of the proposal is high, the level of open space partially mitigates the impression of constrained space.

56 The layout of the uses is also appropriate, and the introduction of commercial uses at ground and lower levels on the western and southern boundaries is necessary given the environmental constraints on these areas. Employment uses on the site have been designed with excellent levels of flexibility, ensuring maximum attractiveness to prospective tenants. There is a good mix of uses around the ground floor landscaped areas, which will assist in surveillance and activity. There are however, some concerns regarding the legibility of the rear-facing industrial units, particularly to visitors, and further rationale should be provided in this respect.

Landscaping and materials

57 The scheme proposes approximately 6,500 sq.m. of communal amenity space, in the form of a semi-public square and shared roof gardens. Generally the proposed landscaping is of a high quality. The westernmost public open space has been designed around the needs of residents and includes areas of soft landscaping suitable for active recreation. Ownership of space would be clear and the road along the northern boundary of the site would be subtly separated from the rest of the site through a mix of hard landscaping and other features.

58 As suggested at pre-application stage, the eastern public open space area would be a public space. Officers recommended that, given the density of the proposed development and the

dearth of public open green space in the vicinity, the space should be conceived more as a pocket park than a hard landscaped plaza. The space will be active but is unlikely to need to accommodate very high volumes of people and should be designed to serve the immediate neighbourhood. As such the level of green space to be provided within the scheme is disappointing.

59 A common approach to materials would be adopted on all buildings across the site. The strategy would avoid large areas of render, by using the render as a frame. Maintenance and weathering effects have been considered. At pre-application stage, it was suggested that the easternmost block would benefit from a different architectural approach in response to its differing use, typology and role within the local townscape, with the benefit of introducing additional architectural variety and avoiding a monoculture across the site. While the architectural approach is interesting, it has been applied on a large scale across the site, and increased differentiation would have been useful to better define buildings and uses. An integrated signage strategy across the site would improve overall legibility of buildings and spaces.

Children's play space

60 Policy 3D.13 of the London Plan and policy 3.6 of the draft replacement London Plan sets out that "the Mayor will and the boroughs should ensure developments that include housing make provision for play and informal recreation, based on the expected child population generated by the scheme and an assessment of future needs". Using the methodology within the Mayor's supplementary planning guidance 'Providing for Children and Young People's Play and Informal Recreation' it is anticipated that there will be approximately 103 children within the development. The guidance sets a benchmark of 10 sq.m. of useable child playspace to be provided per child, with under-5 child playspace provided on-site. As such the development should make provision for 1030 sq.m. of playspace, of which approximately 400 sq.m. should be provided on-site for under 5 year olds.

61 The scheme proposes 545 sq.m. of play space on-site, to provide doorstep play for under-5's and also providing a proportion of space for 5-11 year olds. This space would comprise a 56 sq.m. are at ground floor level within the central courtyard with approximately 484 sq.m. to be provided on the flat roof areas of three of the blocks. It is stated that older children would be catered for by other facilities in the vicinity, and that this would generate the need for a Section 106 contribution towards such provision.

62 Given that the level of on-site space that is proposed would fall below the requirement for both under-5's and 5-11 year olds, confirmation as to how the space would be divided between the age groups is required, noting that the overall provision would not be of sufficient size to fully cater for these age groups. Furthermore, given the constraints of the site in relation to surrounding uses, its orientation and the intensity of development that is proposed, it will be important to ensure that the quality of the courtyard space is sufficient. For instance, given the layout and orientation of the scheme, there is a potential for these spaces to be overshadowed and as a high density mixed-use scheme, it is important that meaningful play space is provided. Further discussion is required in relation to these matters before the application is reported back at Stage 2. The Council should also confirm that additional play space for older children can be satisfactorily accommodated in nearby areas, as suggested by the applicant.

Access and inclusive design

63 London Plan policy 4B.5 and the corresponding draft replacement London Plan (DRLP) policy 7.2 seek to ensure that proposals achieve the highest standards of accessibility and inclusion (not just the minimum), and this and all developments should seek to better minimum access requirements. Design and access statements should explain the design thinking behind the

application and demonstrate how the principles of inclusive design, including the specific access needs of disabled and older people, have been integrated into the proposed development and how inclusion will be maintained and managed. The development should aim to meet the highest standards of accessibility and inclusion. The design and access statement submitted with the proposal provides useful detail on how the scheme meets various technical standards to achieve access for disabled people across the site but there are still some details which need to be confirmed.

Residential Units

64 Policy 3A.5 of the London Plan and policy 3.8 of the draft replacement London Plan require that 100% of new homes meet the Lifetime home standards and that 10% of new housing is designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users. The applicant's documents state that all flats would be subject to the Lifetime Homes standards but it is not clear whether the latest version of the standards is being used to inform the design (published by Habinteg Housing Association in July 2010 (see www.lifetimehomes.org.uk). The access statement also confirms that at least 10% of units would meet Wheelchair Housing standards but does not provide typical flat layouts of the wheelchair accessible homes or show how they would be adapted to suit the needs of future occupiers who are wheelchair users and whether the GLA's Best Practice Guide on wheelchair accessible housing has been complied with. In the absence of an accommodation schedule, or plans showing how, or where, these units would be distributed throughout the development, it is not possible to verify compliance with this aspect of policy. Before the application is reported back at stage 2, indicative floor plans should be provided to show how Lifetime Homes and wheelchair housing standards would be achieved, and how the layouts change between a fully wheelchair accessible unit and one that can be easily adapted for future occupation by a wheelchair user.

65 The applicant should also ensure that a proportionate amount of wheelchair accommodation is provided within the private market and family sized units in order to ensure a genuine housing choice in accordance with London Plan policies. Amenity and play space including balconies also need to be accessible to disabled people. Consideration could be given to a marketing strategy that promotes the accessibility of these new homes to disabled and older people.

66 There would be seven blue badge parking spaces provided within the car park (10% of total), however this would not equate to the number of wheelchair accessible units. This does not therefore reflect best practice standards which require one space per wheelchair unit, and at least one beside each lift core in accordance with the lifetime homes standards, and given the currently unknown level of demand for blue badge parking, a condition should be included on any permission to ensure that the parking management plan includes a mechanism to ensure that the supply and demand of the blue badge bays are regularly monitored and provision reviewed. This is to ensure that provision equates to the demand from disabled residents and visitors and that the bays are effectively enforced, that needs are met and that disabled people are not prevented from living in this development due to a lack of suitable parking.

67 The applicant has confirmed that there would be step-free access to common areas, with lift access to all public areas and residential flats. Corridors, lobbies and doors would be designed to meet relevant accessibility standards. There would be two lifts for cores that are over seven storeys, which is welcomed, and wheelchair units should be located accordingly. However, it would be helpful to understand the logic behind some residential cores having two lifts and some with only one lift.

Public Realm

68 In terms of the external environment, policy 7.5 of the draft replacement London Plan requires that public spaces should be secure, accessible and easy to understand. The indicative landscape plan refers to a gentle gradient between the two sets of steps to access the new public square. However, there is a lack of detail in relation to the gradient and noting the steps at the north west side of the site, it is unclear how integrated the step free route is here or how this 'informal sitting edge' can be used equally by disabled and older people. It would be helpful to have further details on how inclusive design principles have been applied to the design of the open space, landscaping and amenity areas and how the linkages to the DRL and the wider area (including the underpass and pedestrian crossings) have been made fully accessible to all users.

Work Spaces

69 It is unclear how accessible some of the work spaces and industrial units are, with the ground floor plans showing stairs into some of the units in Blocks B1 and B2. It would be helpful to have confirmation that these spaces are fully accessible.

Hotel

70 London Plan policy 3D.7 seeks to increase the quality and quantity of fully wheelchair accessible accommodation in London. Furthermore, the GLA's hotel demand study assessed the supply of wheelchair accessible hotel accommodation in London and identified a shortfall of suitable accommodation.

71 Policy 4.5 of the draft replacement London Plan relates to the provision of visitor accommodation and facilities and it supports an increase in the quality and quantity of fully wheelchair accessible accommodation, in recognition of this shortfall. The draft policy asks for at least 10% of new hotel bedrooms to be wheelchair accessible and for applicants to submit an Accessibility Management Plan which sets out how the continuing management of the hotel will ensure the accessible rooms are maintained and managed, helping inclusive access to become part of the overall operation and business of the hotel (in a similar way that travel plans can ensure a commitment to sustainable travel patterns after occupation). A research study undertaken on behalf of the GLA and the LDA has looked at how inclusive design principles can be applied to London's hotel accommodation and has assessed that less than 2% of existing stock is accessible to disabled people which makes it difficult for disabled people to find an accessible hotel, particularly when linked to other access barriers such as location near accessible public transport facilities or the availability of blue badge parking provision. This is particularly pertinent given the likely number of disabled visitors to London in 2012 for the Olympic and Paralympic Games.

72 Confirmation is required as to the proportion of hotel rooms that would be accessible as it is unclear from the documents as to whether all would be fully accessible or whether there would be a 10% allocation. An indicative layout should also be provided to show how the hotel rooms would be designed to be accessible, and where these would be located in relation to lifts, for example. These details should be provided before the application is reported back at stage 2, and details secured by way of condition.

Sustainable development

73 The London Plan climate change policies as set out in chapter 4A collectively require developments to make the fullest contribution to tackling climate change by minimising carbon dioxide emissions, adopting sustainable design and construction measures, prioritising decentralised energy supply, and incorporating renewable energy technologies with a target of 20% carbon reductions from on-site renewable energy. The policies set out ways in which

developers must address mitigation of, and adaptation to, the effects of climate change. Policies 4A.2 to 4A.8 of the London Plan focus on how to mitigate climate change, and the carbon dioxide emissions reduction targets that are necessary across London to achieve this.

74 The corresponding policies in the draft replacement London Plan are set out in Chapter 5. These policies follow the same general approach with respect to the energy hierarchy but places greater emphasis on minimising carbon dioxide emissions and making use of decentralised energy systems and networks.

Energy – climate change mitigation

75 Policies 4A.4-11 of the London Plan require a reduction in a development's carbon dioxide emissions through the use of passive design, energy efficiency and renewable energy measures. The London Plan requires developments to make the fullest contribution to tackling climate change by minimising carbon dioxide emissions, adopting sustainable design and construction measures and prioritising decentralised energy, including renewable technologies.

Energy efficiency standards

76 A range of passive design features and demand reduction measures are proposed to reduce the carbon emissions of the proposed development. Both air permeability and heat loss parameters will be improved beyond the minimum backstop values required by building regulations. Other features include energy efficient lighting improved controls.

77 Based on the information provided, the proposed development is likely to just exceed 2010 Building Regulations compliance through energy efficiency measures alone. Although the modelling provided uses 2006 Building Regulations compliance software, a reduction in regulated emissions of 29% will be achieved through the first element of the energy hierarchy.

78 The applicant should confirm that the development will comply with 2010 Building Regulations through energy efficiency measures alone, making use of 2010 Building Regulations compliance software where necessary.

District heating

79 No information has been provided on district heating networks. The applicant should investigate whether there are any existing or planned networks within the vicinity of the proposed development. If there are no existing networks available at present, the applicant should provide a commitment to ensure that the development is designed to be able to connect to future district energy networks should one become available.

80 The applicant should commit to a site wide heat network with all dwellings and all other building uses connected. This should include the hotel bedrooms. A schematic plan showing all building uses connected to a single site wide network should be provided. The applicant should also confirm that the network will be supplied from a single energy centre and provide details of its size and location.

Cooling

81 The applicant indicates that active cooling will be minimised through passive design and use of services providing low internal gains e.g. efficient lighting. The applicant should provide further information on the proposed cooling strategy. The applicant should clarify which areas would require active cooling and provide details on how these will be provided.

Combined Heat and Power

82 The applicant is proposing the installation of a 140kWe gas fired CHP unit. The CHP has been sized to meet the domestic hot water profile. The applicant should ensure that the CHP is optimised to provide all the domestic hot water as well as a proportion of the developments space heating demand. The applicant should provide updated load profiles showing both domestic hot water and space heating.

83 The development is estimated to emit 362 tonnes of carbon dioxide emissions per annum after the application of CHP. The applicant estimates that a reduction in CO₂ emissions of 54% will be achieved through this second part of the energy hierarchy. Given the high percentage savings suggested from CHP, the applicant should check and confirm the savings.

Renewable energy technologies

84 The applicant proposes to install 605 sq.m. of solar thermal water heating panels. Taking into account the information supplied by the applicant, it is not accepted that solar thermal and CHP are compatible technologies as they both compete for the same base heat load. The size of the CHP should be optimised as a priority in advance of the consideration of renewable technologies.

85 The applicant should reconsider the use of photovoltaic (PV) panels, using the space identified for solar thermal. Details of the roof area that could accommodate PV should be provided, along with estimates of the electricity generation and potential carbon savings.

Climate change adaptation

86 The London Plan promotes five principles in policy 4A.9 to promote and support the most effective adaptation to climate change. These are to minimise overheating and contribute to heat island effects; minimise solar gain in summer; contribute to flood risk reduction, including applying sustainable drainage; minimising water use; and protect and enhance green infrastructure. Specific policies cover overheating, living roofs and walls and water. These policies have also been carried over into the draft replacement London Plan. Policy 4A.3 of the London Plan requires all development proposals to include a sustainability statement. Further guidance on this policy is given in the London Plan Sustainable Design and Construction SPG. In addition, London Plan policies 4A.3, 4A.11, 4A.14 and 4A.16 require the inclusion of sustainability measures within developments (policies 5.10 to 5.15 of the draft replacement London Plan).

87 The applicant has followed the Mayor's SPG and is proposing a series of measures which would together assist in achieving a BREEAM 'Very Good' with aspirations for 'Excellent' rating for the office, industrial and hotel elements of the scheme and a Code for Sustainable Homes (CfSH) "Level 3" with an aspiration of achieving "Level 4" for the residential units. BREEAM and CfSH pre-assessments have also been submitted as part of the application submission, together with a sustainability appraisal framework, setting out the applicant's commitments. The scheme would for the most part be naturally ventilated, and where mechanical ventilation is required, energy efficient systems would be proposed. Energy efficient appliances and metering, sustainable construction practices, a waste strategy and water conservation measures are proposed.

88 As part of an overall sustainable urban drainage system (SUDS) strategy, living and garden roofs and pervious surfaces at ground level such as permeable paving are proposed, together with an underground attenuation tank. In addition, rainwater from building roofs would be harvested for re-use for landscaping irrigation and external cleaning. The development would be designed to use a minimum of 105 litres per person per day, which would be achieved with water-efficient fixtures and fittings installed, including dual-flush toilets, aerated taps, low-flow showers and water-efficient washing machines and dishwashers. In addition to the living roofs, an ecological

wall, tree planting and bird and bat boxes are proposed to contribute to the intended BRE credentials and improving the biodiversity of the area. These details should be secured by way of condition.

River Thames and flooding

89 Policies 4A.12 and 4A.13 of the London Plan seek to manage the risk of flooding, reduce the increased risk of flooding and the consequences of flooding. The corresponding policy within the draft replacement London Plan is policy 5.12 and requires development proposals to comply with PPS25 with respect to flood risk assessment and management requirements. The site lies within Flood Zone 3 and is thus classified by PPS25 as having a high probability of flooding, with an annual probability of >1% (1 in 100) from rivers (i.e. fluvial), and/or >0.5% (1 in 200) from the sea (i.e. tidal).

90 Surface water management and sustainable urban drainage are proposed in order to ensure the sewer system servicing the site is able to accommodate runoff and will not lead to localised flooding. There would be no residential units or hotel bedrooms located on the basement or ground floor level of the proposed development, and all residential units and hotel bedrooms would be located above the predicted peak flood water level. The proposed basement would be used for car parking and building services plant and equipment. The existing topography precludes the construction of the basement entrance above the predicted peak flood water level. However, the basement would be provided with a sufficient number of stairwells to provide safe internal access to the upper levels of the development.

Ambient noise

91 London Plan policy 4A.20 '*Reducing noise and enhancing soundscapes*' requires that noise sensitive development should be separated from major sources of noise wherever practicable. Corresponding policy 7.15. The advice contained in Planning Policy Guidance note 24 (PPG24): Planning and noise is also relevant.

92 The dominant noise sources in the area of the proposed development are road and railway traffic and the applicant's noise assessment indicates that monitored noise levels place the site into the NEC C, as defined by PPG24. The guidance states that "*Planning permission should not normally be granted. Where it is considered that permission should be given, for example because there are no alternative quieter sites available, conditions should be imposed to ensure a commensurate level of protection against noise.*"

93 Whilst it is noted that the applicant has located residential accommodation at higher levels, above the viaducts, there is a concern in relation to the noise that may be generated by the industrial use at the lower levels, together with the ambient noise from the road and rail. The noise assessment demonstrates that the development would be affected by high noise levels, and that the facade of the proposed development would be required to provide sufficient attenuation to ensure that the guideline internal noise levels conditions are met. Particular attention will need to be paid to glazing which faces the road and railway, with provision made for trickle vents in order to make the living conditions for residents acceptable. The Council should ensure that appropriately worded conditions are imposed in this respect, including a requirement that maximum noise levels are not exceeded. However, there remains a concern, as detailed in paragraph 35 above, that the constraints of the site are such that the living standards of future residents may be compromised and that this is indicative of the density, layout and mix of uses proposed.

Transport

94 The overall level of car parking proposed is in line with the standards set out in London Plan policy 3C.23 'Parking Strategy' and draft replacement London Plan policy 6.13 'Parking'. A total of 87 car parking spaces will be provided for the proposed 312 residential units, including nine dedicated spaces for blue-badge holders. This represents a parking ratio of 0.28 spaces per unit, which is supported. The provision of five spaces provided for the hotel, six spaces for the light industrial units, and seven spaces for the offices is also considered acceptable. Further to the proposed residential parking spaces, it would also be expected that future residents of the development be restricted from applying for on-street parking permits. This should be secured by way of planning condition or section 106 obligation.

95 Overall, the applicant proposes to fit 20% of all car parking spaces with active electric vehicle charging points. Although the applicant also proposes to make passive provision for a further 10% of spaces, it would be appropriate to increase this to 20% in line with draft replacement London Plan policy 6.13 'Parking'. To promote sustainable car use, the applicant should consider providing dedicated car club parking spaces, and measures to promote car club use should be contained in the site's travel plan.

96 The proposed level of cycle parking for the individual elements of the scheme is consistent with TfL standards, and those set out in draft replacement London Plan policy 6.13 'Parking'.

97 Given the restraint-based approach taken to car parking provision across the site, the level of vehicular trips generated by the proposed development is unlikely to have a significant impact on the operation of the TLRN.

98 The proposed development is, however, likely to generate additional demand on the local bus network, which is currently at capacity. Further discussion with the Council and the applicant regarding a financial contribution towards improving bus capacity in the vicinity of the development.

99 The quality of the pedestrian realm around the site is poor, which limits direct access to public transport nodes. On this basis, opportunities for improving pedestrian and cyclist movements close to the site, particularly at Preston's Road roundabout, should be explored. It would be appropriate for contributions to be pooled from this and surrounding developments to improve connectivity in and around the roundabout, in line with London Plan Policy 3C.21 'Improving conditions for walking' and draft replacement London Plan Policy 6.10 'Walking'. Further discussions between Transport for London, the applicant and the Council will be necessary in this respect.

100 The submission of a travel plan is welcomed in line with London Plan Policy 3C.21 'Integrating Transport and Development', however further work is required in order for the documents to be policy compliant. Details of the number of employees within the proposed development should be included, and specific targets should be identified for public transport trips, considering the site's good proximity to a number of transport nodes. The submission of both a construction management plan and a delivery and servicing plan is welcomed, and these should be secured through planning condition or the section 106 agreement.

Crossrail

101 In view of the strategic regional importance of Crossrail to London's economic regeneration and development, and in order to bring the project to fruition in suitably timely and economic manner, contributions will be sought from development likely to add to or create congestion on central London's rail network that Crossrail is intended to mitigate. This will be through planning

obligations, arrangements for the use of which are established at strategic level in accordance with relevant legislation and policy guidance (Policy 3C.12A of the London Plan and draft replacement London Plan Policy 6.5).

102 The approach for collecting contributions towards Crossrail is set out in the Mayor's Supplementary Planning Guidance (SPG) 'Use of Planning Obligations in the funding of Crossrail' (July 2010). The SPG states that contributions should be sought in respect of retail, hotel and office developments on the Isle of Dogs, which involve a net increase in floorspace of more than 500sqm (GEA). As the proposed development falls within the Isle of Dogs Contribution Area, the proposed indicative level of charge is £186 per sq.m. for new office floorspace, £119 per sq.m. for new retail floorspace and £82 per sq.m. for new hotel floorspace.

103 A requirement for a Crossrail contribution from this development will therefore relate to the net additional impact from the new development, by deducting the theoretical charge that would be paid by the existing uses within the site.

104 Assuming that none of the existing uses fall within use Class B1(a) Offices, these would not generate any theoretical contribution, although TfL would welcome clarification in this respect. The proposed chargeable uses (5,717 sq.m. of Class B1(a), 211 sq.m. of Class A1/A3 and 4,645 sq.m. of Class C1) would generate a contribution of £1,467,721, and this should be paid to TfL upon commencement of the proposed development, and secured as part of the section 106 agreement.

105 In light of the fact that the applicant's financial appraisal/toolkit has yet to be received or verified, further discussion and negotiation will be necessary before the application is reported back at Stage 2, in order to confirm what financial contributions the applicant has factored into the appraisal and how these will be prioritised by the Council, and keeping in mind the strategic priority of Crossrail.

Local planning authority's position

106 The Council is intending to report the application to its Planning Committee in the new year, but has yet to form a view on the scheme.

Legal considerations

107 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

108 There are no financial considerations at this stage.

Conclusion

109 London Plan policies on mixed-use development, hotels, housing, tall buildings, views, conservation, urban design, children's play space, inclusive design, sustainable development, flooding, ambient noise, transport and Crossrail are relevant to this application. The application complies with some of these policies but not with others, for the following reasons:

- **Principle of development:** The principle of a mixed-use redevelopment of the site is supported by London Plan policy 2A.2 and 2A.9, however, the appropriateness of a hotel in this location should be further justified by the applicant and appropriate mitigation measures secured to ensure an acceptable residential environment.
- **Housing/affordable housing:** The provision of housing on the site is consistent with policy 3A.1 of the London Plan. However, in the absence of an appraisal of the applicant's financial viability report, it is not possible to establish if the affordable housing is the 'maximum reasonable amount', in accordance with policy 3A.10 of the London Plan. The housing mix is also inconsistent with strategic planning guidance.
- **Density:** Further information and discussion is required in order to be satisfied as to the proposed density of the site, and that it is appropriate for its context.
- **Urban design:** The principle of a tall building is acceptable in strategic planning terms, however improvements or further information are required to demonstrate compliance with London Plan policy 4B.1.
- **Children's play space:** Whilst a play strategy has been submitted, further clarification and details are required to demonstrate that the scheme complies with London Plan policy 3D.13 and relevant planning guidance.
- **Inclusive design and accessibility:** The applicant has committed to meeting Lifetime Homes standards, together with the provision of 10% wheelchair accessible units. However, insufficient information has been provided in order to demonstrate that the scheme accords with London Plan policies 3A.5, 3D.7 and 4B.5.
- **Energy:** The applicant has broadly followed the energy hierarchy, however further revisions and information is required before the proposals can be considered acceptable in strategic planning terms.
- **Climate change adaptation:** The applicant has provided sufficient information to demonstrate that the scheme would meet the requirements of the London Plan and Mayor's Sustainable Design and Construction SPG. The measures proposed would need to be secured by way of condition.
- **Flooding:** Appropriate flood mitigation measures are proposed to ensure that the scheme complies with policies 4A.12 and 4A.13 of the London Plan.
- **Ambient noise:** The scheme would be affected by high noise levels and suitable attenuation measures are required to ensure that a satisfactory standard of accommodation is achieved in accordance with policy 4A.20, and which should be secured by way of condition.
- **Transport:** The scheme is broadly acceptable from a transport and parking perspective but there are several issues that require further work before the proposals can be accepted as fully compliant with London Plan transport policies.
- **Crossrail:** The site falls within the Isle of Dogs Contribution Area, as set out in the Mayor's SPG '*Use of Planning Obligations in the funding of Crossrail*', and the scheme generates the requirement for a contribution towards Crossrail.

110 On balance, the application does not comply with the London Plan.

111 The following changes might, however, remedy the above-mentioned deficiencies, and could possibly lead to the application becoming compliant with the London Plan:

- **Hotel:** Further discussion is required in order to be satisfied that this is an appropriate location for a hotel.
- **Housing/affordable housing:** Further information is required in relation to the housing mix, housing quality, together with verification of the applicant's financial appraisal to demonstrate that the affordable housing level is the maximum reasonable amount.
- **Urban design:** Improvements or further information is required in terms of the position of the tall building, the provision of hotel in this location, residential quality and orientation, legibility of industrial uses, and provision of green spaces.
- **Children's play space:** Further discussion and clarification in relation to the allocation of play space within the scheme and its quality, and how older children would be catered for, is required.
- **Inclusive design:** Confirmation of how the residential units would comply with Lifetime Homes and wheelchair accessibility standards is required before the application is referred back at Stage 2, together with a schedule of accommodation and an indicative layout plan of a typical flat. Further information in relation to the external environment and pedestrian linkages to the site is also required.
- **Energy:** Further information is required in relation to carbon savings and compliance with 2010 Building Regulations, together with commitments in terms of the approach to renewable energy. The applicant should also provide an updated estimate of the regulated emissions. An updated estimate of the overall carbon savings compared to a 2010 Building Regulations compliant development should also be provided.
- **Transport:** Measures are required in order to mitigate the transport impacts of the development. These include and contributions towards improving bus capacity, and the delivery of pedestrian and public realm improvements. Further work on the travel plan is required, and a construction logistics plan and delivery and servicing plan should be secured by way of condition.
- **Crossrail:** The applicant is required to make a contribution of £1,467,721 towards Crossrail.

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