planning report PDU/3059c/01
11 November 2014

Morgan House, 17-19 The Mall, Stratford, E15
in the London Borough of Newham

planning application no. 14/02289/FUL

Strategic planning application stage 1 referral (new powers)

The proposal
A residential-led mixed use development comprising the refurbishment and extension of Morgan House building to 20 storeys including an amenity deck and rooftop amenity areas; the erection of new buildings comprising a 42 storey building, a 25 storey building and a 3 storey podium building comprising 583 (C3) residential units (69,158 sq.m. GEA including associated private and communal amenity areas, 4,539 sq.m. (GEA) of retail/leisure floorspace (A1, A2, A3, A4 and/or D2), 1,359 sq.m. (GEA) of office floorspace (B1a), replacement market trader storage facilities, associated car and cycle parking areas, provision of new and enhanced public realm areas, modifications to the existing Stratford Centre to include alterations to the access including a new entrance ramp and modifications to the existing multi-storey car park and reconfiguration of the existing car park, alterations to servicing and storage facilities with associated highway works; access and connectivity improvements, landscaping, open space and public realm.

The applicant
The applicant is **CEPF Chariot S.a.r.l.** and the architect is **Allford Hall Monaghan Morris.**

Strategic issues
The application raises strategic planning issues in respect of the proposed the **2012 Games and their legacy, offices, retail, housing and affordable housing, urban design, inclusive design, sustainability, energy** and **transport**. The main unresolved strategic planning issues relate to **convergence**, provision of **affordable shops, affordable housing, residential standards** and **inclusive design.**

Recommendation
That Newham Council be advised that while elements of the application are acceptable in strategic planning terms, the application does not comply with the London Plan in a number of areas for the reasons set out in paragraph 81 of this report, but that the possible remedies set out this paragraph could address these deficiencies.
Context

1 On the 5 March 2013 the Mayor of London received documents from Newham 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 is required 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.

2 This report sets out information for the Mayor’s use in deciding what decision to make.

3 The application is referable under Categories 1B (development outside Central London and with a total floorspace of more than 15,000 sq.m.), and 1C (development which comprises or includes the erection of a building more than 30 metres high outside the City of London), of the Schedule to the Order 2008.

4 Once Newham 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.

5 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.

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

Site description

7 The application site comprises Morgan House (an existing fifteen storey office building), part of the Stratford Centre shopping centre, existing vehicular ramps and various servicing areas. It is approximately 3.065 hectares in size and is located within Stratford town centre and forms part of Stratford Island. The Shoal is located along the northern boundary of the site which was introduced as part of wider environmental improvements prior to the 2012 Olympic and Paralympic Games and which was partly designed to mask the unattractive open service yard at the base of Morgan House.

8 The application site includes a southern element of the 1973 Stratford Centre which currently provides approximately 27,000 sq.m. of retail floorspace together with a multi-storey car park providing around 586 pay and display car parking spaces. The centre provides over 50 outlets including Sainsbury’s, WH Smith, Boots, Dorothy Perkins, New Look, Mothercare and Peacocks, as well as an indoor market. The application site also includes market traders storage located within the west mall of the Stratford Centre, Morgan House which is currently vacant but provides 19,818 sq.m. of office accommodation, 220 car parking spaces and the entrance ramp to the Stratford Centre multi-storey car park.
Details of the proposal

9 The application seeks detailed planning permission for a residential-led mixed use development comprising the refurbishment and extension of Morgan House building to 20 storeys including an amenity deck and rooftop amenity areas; the erection of new buildings comprising a 42 storey building, a 25 storey building and a 3 storey podium building comprising circa 583 (C3) residential units (69,158 sq.m. GEA including associated private and communal amenity areas, 4,539 sq.m. (GEA) of retail/leisure floorspace (A1, A2, A3, A4 and/or D2), 1,359 sq.m. (GEA) of office floorspace (B1a), replacement market trader storage facilities, associated car and cycle parking areas, provision of new and enhanced public realm areas, modifications to the existing Stratford Centre to include alterations to the access including a new entrance ramp and modifications to the existing multi-storey car park and reconfiguration of the existing car park, alterations to servicing and storage facilities with associated highway works; access and connectivity improvements, landscaping, open space and public realm.

Planning history

10 A number of pre application meetings have been held with GLA and TfL officers regarding the redevelopment of the application site over recent years. The first meeting took place on the 6 December 2011 that proposed the demolition of Morgan House and the creation of a new hotel. A second meeting took place on the 20 November 2012 when discussions on a scheme that again proposed the demolition of Morgan House and the introduction of a significant element of student housing. A planning application based on this scheme was considered by the Mayor of London at Stage 1 on the 10 April 2013 (planning report PDU/3059a/01), when it was concluded that whilst the scheme was generally acceptable in strategic planning terms, it did not comply with the London Plan in a number of areas including the lack of clarity on how the proposed student housing would be tied to specific educational institution, convergence, connectivity, and urban design.

11 A further pre-application meeting took place with GLA and TfL officers on the 3 June 2014 to consider the current scheme. Officers offered support for the provision of new residential accommodation as well as new and improved retail floorspace, and advised that the scheme generally responded well to the opportunities and constraints presented by the site. However, officers suggested that an element of office floorspace should be included or maintained and that the scheme be revised to address a number of strategic concerns including the quantum and delivery of affordable housing, the number of studio units, children’s play space, urban design, inclusive design, energy and transport.

Strategic planning issues and relevant policies and guidance

12 The relevant issues and corresponding policies are as follows:

- The 2012 Games & legacy: London Plan;
- Mix of uses: London Plan;
- Town Centres: London Plan;
- Housing: London Plan; Housing SPG; Housing Strategy; Draft Revised Housing Strategy; Shaping Neighbourhoods: Play and Informal Recreation SPG;
- Urban design: London Plan; Shaping Neighbourhoods: Character and Context Draft SPG;
- Inclusive design: London Plan; Accessible London SPG;
- Sustainable development: London Plan; Sustainable Design and Construction SPG; Mayor’s Climate Change Adaptation Strategy; Mayor’s Climate Change and Energy Strategy; Mayor’s Water Strategy;
• **Transport**  
  *London Plan; draft Early Minor Alteration to the London Plan; the Mayor’s Transport Strategy;*  

• **Crossrail**  
  *London Plan; Crossrail SPG; and, Mayoral Community Infrastructure Levy.*

13 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the 2012 London Borough of Newham Core Strategy, the saved policies from Newham’s Unitary Development Plan, and the 2011 London Plan (with 2013 Alterations).

14 The following are also relevant material considerations:

- The National Planning Policy Framework and associated Technical Guide;
- The Mayor’s Olympic Legacy Supplementary Planning Guidance, (OLSPG), 2012;
- The draft Further Alterations to the London Plan, (January 2014);
- LLDC Publication Draft Local Plan, (September 2014);
- Newham Council’s 2010 Stratford Metropolitan Masterplan.

**The 2012 Games and their legacy**

15 The London Plan sets out the Mayor’s vision for the sustainable development of the capital and paragraph 1.54 confirms that he will apply the Plan’s objectives and principles to the new and existing neighbourhoods in the Lea Valley associated with the 2012 Games. Policy 1.1 confirms that the development of East London will be a priority for the Mayor and reinforces his objective to promote social and economic convergence between East London and other parts of the city.

16 Policy 2.4 of the London Plan commits the Mayor’s to use the 2012 Games to deliver fundamental economic, social and environmental change within East London and to close the deprivation gap between the Olympic Host Boroughs and the rest of London. This is known as convergence.

17 The application site is also within the area covered by the Mayor’s Olympic Legacy Supplementary Planning Guidance (OLSPG) which states that larger planning applications in the OLSPG area should demonstrate how they will help achieve convergence. The applicant was advised of this policy requirement at pre-application stage but has not set out or committed to explicit measures, by for example providing training for local people to help them secure permanent jobs working within the development should it proceed. This should be addressed before the application is referred back to the Mayor at Stage 2.

18 Specifically, the application site falls within the OLSPG’s Stratford sub-area which envisages Stratford become a thriving metropolitan centre with strong connections between the existing town centre and its surrounding areas, and notes that the Stratford gyratory physically divides the town centre and separates the more established retail centre from the rail and bus facilities at the new regional station.

19 The OLSPG therefore identifies a number of key connections that should be provided over time to improve connectivity. One such connection (identified in conjunction with Newham Council) is a north-east/south-west pedestrian connection that would create increased permeability through the Stratford Island site and link north and south with other existing and proposed links. This important route would bisect the application site and significantly improve local and strategic connectivity. The applicant’s original proposals did not include this connection, but it is provided by the current scheme, which is welcomed and strongly supported.
Proposed land uses

Office

20 The London plan identifies Stratford as one of the capital’s two strategic office centres beyond central London, and a potential Outer London Strategic Development Centre. The Plan also identifies Stratford as a town centre with the potential to develop and expand its strategic office function. As set out above, the application site currently contains Morgan House, a 15 storey (19,818 sq.m.) office building. The loss of this office space could therefore potentially have a negative effect on Stratford’s strategic office role. However, the office building is currently vacant and of limited architectural quality, is in poor physical condition, and its floor plate and design are not considered conducive to modern office requirements. Significant new office floor space is also planned or developed elsewhere within Stratford. In these circumstances, the loss of the office floorspace within Morgan House is acceptable from a strategic planning perspective, particularly as the applicant is now proposing 1,359 sq.m. (GEA) of new office floorspace as part of its current scheme.

Retail

21 London Plan policy 4.7 provides a set of principles that should be applied when taking planning decisions on new retail and town centre development. These include that scale should be related to the size, role and function of a town centre and its catchment and be located and focussed within existing town centres. Paragraph 24 of the NPPF states that local planning authorities should apply a sequential test to planning applications for town centre uses, and should firstly require such applications to be located in existing town centres.

22 Policy 4.9 of the London Plan goes on to state that when considering proposals for large retail developments, the Mayor will, and boroughs should, consider imposing conditions or seeking contributions through planning obligations (where appropriate, feasible and viable), to provide or support affordable shop units suitable for small or independent retailers. This policy is designed to provide support for independent retailers and small enterprises.

23 The application site is within a defined Town Centre where the London Plan and OLSPG envisage and support further retail growth. The principle of significant new retail floorspace in this location is therefore fully supported in strategic planning terms. However, the applicant had been advised to show how its proposals would provide or support affordable shop units suitable for small or independent retailers in order to demonstrate compliance with London Plan policy 4.9. This though has not yet been done, and as currently envisaged, the application does not comply with the London Plan in this respect.

Residential

24 As set out above, the London Plan identifies Stratford (and the Lower Lea Valley) as an Opportunity Area which should provide a minimum 32,000 new homes and 50,000 new jobs. The Plan also supports the growth of Stratford Town Centre from a major centre into a new metropolitan centre, supported by a rich mix of employment, housing and open spaces. The introduction of additional residential accommodation into this highly accessible location would help achieve local and strategic housing targets is therefore strongly supported.
Housing

Housing mix

25 The new residential elements would be within four buildings and provide a total of 583 flats comprising:

- Morgan House - would be extended horizontally and vertically and converted to provide 213 apartments and include a large new amenity deck alongside the building between Morgan House and Broadway Terrace;
- Great Eastern tower - a new 42 storey building providing 240 apartments overlooking a new public square between this new tower and Morgan house.
- A new 3 storey podium building to be known as the Pavilion, also overlooking the new public square and providing 14 duplex family apartments.
- Meridian tower, a new 25 storey building that would provide 116 apartments.

26 The following housing mix is proposed:

<table>
<thead>
<tr>
<th></th>
<th>Morgan House</th>
<th>Great Eastern Tower</th>
<th>The Pavilion</th>
<th>Meridian Tower</th>
<th>Total Units</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Studio</td>
<td>2</td>
<td>16</td>
<td>9</td>
<td></td>
<td>27</td>
<td>8</td>
</tr>
<tr>
<td>1 bedroom</td>
<td>57</td>
<td>103</td>
<td>54</td>
<td></td>
<td>214</td>
<td>47</td>
</tr>
<tr>
<td>2 bedroom</td>
<td>82</td>
<td>108</td>
<td>4</td>
<td>31</td>
<td>225</td>
<td>27</td>
</tr>
<tr>
<td>3 bedroom</td>
<td>72</td>
<td>13</td>
<td>10</td>
<td>22</td>
<td>117</td>
<td>19</td>
</tr>
<tr>
<td>Total</td>
<td>213</td>
<td>240</td>
<td>14</td>
<td>116</td>
<td>583</td>
<td>100</td>
</tr>
</tbody>
</table>

27 Nineteen percent (19%) of the proposed units would therefore be (3 bedroom) family units. This accords with the Mayor’s OLSPG and is acceptable in strategic planning terms given the site’s central town centre location.

Affordable housing

28 London Plan policy 3.12 requires local planning authorities to seek the maximum reasonable amount of affordable housing when negotiating on individual private residential and mixed-use schemes and to have regard to local targets and London Plan policy 3.11 which looks for 60% of new affordable housing to be for social rent and 40% for intermediate rent or sale. The Mayor’s Early Minor Alterations to the London Plan address the introduction of affordable rent.

29 Policy 3.12 is supported by paragraph 3.71, which urges local planning authorities to take account of economic viability when estimating the appropriate amount of affordable provision. The ‘Three Dragons’ development control toolkit or other recognised appraisal methodologies are recommended for this purpose.

30 Pre-application discussions relating to affordable housing were limited and despite a number of subsequent requests, no details of the applicant’s affordable housing proposition have been provided other than it believes that any affordable housing should be provided offsite. A viability study has been submitted to Newham Council which it is assessing, but this also fails to confirm the applicant’s intended approach. It is not therefore possible to confirm that the maximum reasonable level of affordable housing the scheme could support would be provided and the application therefore fails to comply with the London Plan in this respect.
Finally, paragraph 3.74 of the London Plan confirms that affordable housing should normally be provided on site and only provided off-site or through a cash-in-lieu ring-fenced or pooled contribution in exceptional circumstances. The revised early alterations to the London Plan strengthens this position and state that:

“In exceptional cases where it can be demonstrated robustly that this is not appropriate in terms of policies in this Plan, it (affordable housing) may be provided off-site. A cash in lieu contribution should only be accepted where this would have demonstrable benefits in furthering the affordable housing and other policies in this Plan, and should be ring fenced and, if appropriate, pooled to secure additional affordable housing either on identified sites elsewhere or as part of an agreed programme for provision of affordable housing.”

The applicant should therefore urgently confirm its approach to affordable housing in light of established London Plan policy so as to demonstrate compliance.

Density

London Plan policy 3.4 requires development to optimise housing output for different locations taking into account local context and character, design principles set out in Chapter 7 of the London Plan and the public transport capacity. Table 3.2 provides density guidelines in support of this. The site has a public transport accessibility level (PTAL) of 6b and has characteristics of a Central setting and therefore has a strategic density range of 140-405 u/ha or 650-1100 hr/ha.

The applicant contends that the proposed development would have a residential density of 530 habitable rooms per hectare - based on 583 dwellings providing 1,625 habitable rooms on a site area of 3.06 hectares. The GLA’s methodology which takes account the non residential uses the scheme proposes (as set out in paragraph 1.3.47 of the Mayors Housing SPG), calculates the density to be 207 units per hectare or 572 habitable rooms per hectare. This is broadly in line with the London Plan and is acceptable in strategic planning terms.

Residential standards and quality

London Plan policy 3.5 (and Table 3.3) set out requirements for the quality and design of housing developments including minimum space standards. All units would be expected to meet these standards and the applicant was asked at pre-application stage to ensure that its design and access statement demonstrated how the units would meet ‘Lifetime Homes’ standards and how the scheme would comply with the design guidance in Annex 1 of the Housing SPG. The applicant was also advised that all units should provide a minimum 2.6 metre floor-to-ceiling height.

Whilst the applicant has acknowledged this policy requirement, it has not provided a schedule that demonstrates that its proposed approach would meet these standards. This should be provided before the scheme is referred back to the Mayor at Stage 2.

Children’s play space

At pre-application stage the applicant was advised to take account of London Plan policy 3.6, which seeks to ensure that development proposals include suitable provision for play and recreation and ensure that sufficient space is provided in accordance with the estimated expected child population of the completed development. Whilst the actual tenures are still to be confirmed, the GLA’s child yield calculator suggests that the completed scheme would be likely to result in at least 64 children, and hence 640 sq.m. of play space should be provided.
The applicant has confirmed that 536 sq.m. of dedicated playspace could be provided as part of approximately 6,560 sq.m. of outdoor amenity space across the scheme as a whole. The design and access statement however only identifies 454 sq.m. of dedicated playspace. The location, quantum and quality of on-site play space should therefore be clarified and demonstrated to comply with London Plan standards before the scheme is referred back to the Mayor at stage 2. The applicant should also demonstrate how inclusive play has been integrated into its site wide play strategy.

Urban design

The proposed development has been commented on at a number of pre-application meetings with GLA officers where concerns were expressed regarding the proposed approach to permeability and the quality of the frontage looking on to Great Eastern Road, and officers advised that whilst the overall massing, height and architectural treatment was considered to be acceptable, its ground floor relationship to Great Eastern Road remained unresolved.

These matters have now been satisfactorily addressed and officers consider the current scheme to be generally well designed, that it would greatly improve the permeability of the town centre and would add to its public realm network by creating new legible and animated routes and public spaces. These aspects are therefore strongly supported.

Whilst not within the application boundary, the applicant has also illustrated how the scheme could accommodate the redevelopment of part of Broadway. This is also strongly supported as it would increase the overall efficiency of the site as well as enabling a new north south route between the bus station and Broadway. The incorporation of a perimeter block, the enclosing servicing and parking, and locating retail uses along the ground floor are also strongly supported and would help ensure a safe, attractive and well used public realm.

The retention, refurbishment and adaptation of Morgan House is accepted in principle and the design approach has the potential to ensure that the proposals would make a positive contribution to the urban design quality and character of the town centre.

The residential quality within the refurbished Morgan House is high. It was suggested at pre-application stage that the applicant increased the proportion of dual aspect units and reduced the number of units sharing the same landing by creating through flats. This has since been modified which is welcomed.

A new building is proposed along Great Eastern Road. This building would provide better enclosure and animation. Consideration should though be given to increasing the height of this building to better enclose Great Eastern Road given its width and the lack of enclosing development opposite.

The ground floor of this building would provide retail units to a new internal public open space. This would be accessed via an undercroft from Great Eastern Road – which is strongly supported, built it is suggested that the applicant clarify its legibility and quality to ensure that it would feel safe or attractive to use.

The potential changes to the Sainsbury’s unit are strongly supported and would improve the frontage to Great Eastern Road whilst making better use of this part of the site. The potential consolidated servicing arrangements are also strongly welcomed.
Public realm

47  The quality of the public realm around the site will be significantly improved with the proposed works, which is welcomed. However, it is understood that the access to the service and residential car parking areas are to be provided as shared surface and there are aspirations for this area of the site to be a future east west route to the Broadway. Paragraph 6.37 of the London Plan emphasises the importance of providing “safe and attractive routes that are easy to navigate”, and paragraph 6.38 explains that: “Walking issues should be addressed in development proposals, to ensure that walking is promoted and that street conditions, especially safety, security and accessibility for disabled people, are enhanced.”

48  It will therefore be important to fully understand the level of traffic entering and leaving this area of the site, and it is also recommended that the applicant illustrate what design features will be incorporated to ensure that the areas are safe and usable for disabled people and incorporate clearly delineated safe areas where no vehicle would be able to enter. Potential conflicts with users of the public realm outside the Theatre and the reconfigured ramp access for Meridian Square were also identified at pre-application stage but appear unresolved.

Parking

49  The applicant was advised at pre-application stage to ensure that its design and access statement demonstrated that adequate provision of Blue Badge parking bays would be made for all employees, visitors and residents in line with London Plan policies 3.8 (Housing Choice) and 6.13 (Parking) and Table 6.2. and that the provision and future management of the Blue Badge parking bays for residents should be in line with the advice in the Lifetime Homes standards and the Wheelchair Housing Design Guide, and these bays should be located as close as possible to the relevant entrances and cores. These matters have not been clarified and the application does not yet comply with the London Plan.

Inclusive cycling and mobility scooter storage

The applicant was encouraged at pre-application stage to incorporate an element of parking suitable for inclusive cycles and tricycles which would be accessed via a step-free route. Where cycle parking is provided within the public realm it is also important that it does not present as a hazard to people who are Blind or partially sighted. It was also asked to consider providing storage space and charging points for mobility scooters, in accordance with section 2.3.7 of the Mayor’s Housing SPG. These matters have been acknowledged, but no details provided.

Residential units

50  The applicant has confirmed that all residential units will be designed to the Lifetime Homes standard and that 10% will be wheelchair accessible or easily adaptable homes. This is welcomed and in line with London Plan policy 3.8 (Housing choice).

51  It has however not immediately clear where these wheelchair accessible homes would be located or how many there would be – which should be distributed across tenure types and sizes to give disabled and older people similar choices to non-disabled people. This matters should also be addressed before the scheme is referred back to the Mayor at Stage 2.

Sustainable development

52  The applicant has prepared and submitted detailed environmental documentation in respect of noise and vibration, energy, air quality, archaeology, groundwater and contamination, water resources, flood risk and drainage, microclimate, daylight and sunlight and waste. This is welcomed and subject to resolution of the matters set out below, is considered satisfactory from a strategic planning perspective.
Energy

Overview

53 The applicant has broadly followed the energy hierarchy. Sufficient information has been provided to understand the proposals as a whole. Further revisions and information are however required as set out below before the proposals can be considered acceptable and the carbon dioxide savings verified.

Energy efficiency standards

54 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 low energy lighting, mechanical ventilation with heat recovery and reduced thermal bridging. The demand for cooling will be minimised through overhangs, solar control glazing, blinds, low energy lighting and mechanical ventilation. The applicant should confirm whether the dwellings are provided with active cooling. If so, this should be quantified together with other site wide energy demands. Further information should also be provided on how the cooling demand in the non-domestic units has been minimised in line with policy 5.9.

55 The development is estimated to achieve a reduction of 40 tonnes per annum (5%) in regulated CO2 emissions compared to a 2013 Building Regulations compliant development. Sample modelling outputs have been provided supporting the savings claimed.

District heating

56 The applicant has identified that the Stratford district heating network is within the vicinity of the development and is proposing to connect to the network. Evidence of correspondence with the network operator has been provided, including a Connection Agreement Request Form suggesting that the process for connection has already started. This is welcome.

57 The applicant is proposing to install a site heat network. However, the applicant should confirm that all apartments and non-domestic building uses will be connected to the site heat network. A drawing showing the route of the heat network linking all buildings on the site to the district heating network should be provided.

58 The applicant has provided some plans showing substations and temporary plant rooms. Clarification should be provided on the purpose of these as it is unclear why temporary plant is needed if immediate connection is being arranged with Cofely. Cofely has provided a carbon emission factor for the network and a reduction in regulated CO2 emissions of 410 tonnes per annum (55%) will be achieved through this second part of the energy hierarchy.

Renewable energy technologies

59 The applicant has investigated the feasibility of a range of renewable energy technologies and found solar PV to be a feasible option. The applicant is not proposing to install any renewable energy technology for the development as the target is being met without the installation of renewables. The installation of solar PV to further enhance carbon savings would be welcome.
Conclusion

A reduction of 450 tonnes of CO2 per year in regulated emissions compared to a 2013 Building Regulations compliant development is expected, equivalent to an overall saving of 58%. These savings exceed the target set within Policy 5.2 of the London Plan however the matters set out above should be addressed before compliance with London Plan energy policy can be verified.

Transport

Introduction

Pre-application meetings and follow-up meetings have been held with the GLA and TfL to discuss the development proposal which was the subject of detailed comments provided by TfL to Newham Council on 24th October 2014.

Site and surroundings

The site is located within the Stratford sub-area of the Olympic Legacy Supplementary Planning Guidance (OLSPG) and located on Great Eastern Road, which along with Broadway makes up the Stratford gyratory, part of the Strategic Road Network (SRN). The nearest section of the Transport for London Road Network is the A12 Blackwall Tunnel Northern Approach Road about 1.5km away. Cycle Superhighway 2 runs past the site.

Stratford regional station is opposite the site, and has London Underground Jubilee and Central lines, two branches of the Docklands Light Railway (DLR), London Overground and National Rail services, alongside numerous bus routes. In addition Stratford High Street DLR station is within 300 metres walk. As such the site records the highest public transport accessibility level (PTAL) of 6b, on a scale of 1-6.

Newham Council has made a Local Implementation Plan (LIP) Major Scheme bid for funding to return Great Eastern Road and Broadway to two-way working. The TA sets out that both the proposed access junctions would comply with the arrangements put forward in the LIP bid, however in the event that it is successful further discussion will be needed between Newham Council, TfL and this applicant as to details.

Trip generation and impact

It is accepted that the development will have a negligible additional impact on the capacity of both public transport and, subject to the already requested detailed clarification, the surrounding highway network.

Access junctions and public realm

In principle the proposed access arrangements are acceptable to TfL. The new junctions with Great Eastern Road will need to be signalised to aid co-ordination of movement along this part of the SRN and should be part of the separate approval required under the Traffic Management Act 2004. Detailed design should safeguard efficient operation of the nearby Stratford bus station and the capacity and safety of general vehicle movements including for Angel Lane opposite one of the proposed access points.

Appropriate provision should be made on the Great Eastern Road frontage / public realm and for crossing of this road at grade by cyclists and users of public transport as well those completing their whole trip on foot. Legible London signing should be provided within and close to the development. Given the choice and to encourage use it is also recommended that real time public transport information is provided in communal areas of the development.
Newham Council and the applicant should agree how these various works and improvements will be delivered and funding sought in the context of Newham’s CIL scheme and the separate section 278 and Traffic Management Act 2004 approvals which will be required. It is recommended that a condition is imposed requiring the preparation and approval of a programme for implementation of the highway and associated works to enable planning of the design, approvals processes and the actual implementation of the works.

Car and cycle parking

TfL supports the proposal for a car free development (other than residential blue badge spaces). The legal agreement should ensure that residents and staff are not eligible for local on-street parking permits and free/subsidised long term parking in town centre car parks which would undermine this proposal. In addition arrangements should be put in place for a car club including identified parking spaces.

As well as Blue Badge car parking (addressed in paragraph 50), electric vehicle charging points must be provided in accord with London Plan policy together with two car club spaces which should be secured by condition together with suitable provision for set down and pick up of passengers and for taxis.

The proposed level of cycle parking is in accordance with the Further Alterations to the London Plan (FALP). However TfL requires clarification on where short stay cycle parking will be located and that showers and lockers will be provided for staff who cycle. As TfL is proposing to expand the Cycle Hire scheme in Newham a site for a docking station should be safeguarded within the development at a suitable location to be agreed subsequently.

Parking, servicing and construction.

A Servicing Management Plan (SMP) and a Car Parking Management Plan (CPMP) should both be secured by condition. These should include appropriate arrangements for market traders who currently have storage and park informally on the site.

A Construction Logistics Plan (CLP) should also be secured by condition. Given the site’s location it will be particularly important that it provides for safe site access and appropriate routing especially of large vehicles together with unimpeded operations at the bus station and continued use of the SRN.

Travel plans

TfL welcomes the submission of Travel Plans, although these failed the ATTrBuTe assessment and should be revised accordingly. The travel plans should be secured, enforced, monitored and reviewed via the S106 agreement.

Crossrail

The Mayor has introduced a London-wide Community Infrastructure Levy (CIL) to help implement the London Plan, particularly policies 6.5 and 8.3. The Mayoral CIL formally came into effect on 1 April 2012, and it will be paid on commencement of most new development in Greater London that was granted permission on or after that date. The Mayor’s CIL will contribute towards the funding of Crossrail and will be treated as a credit towards the section 106 liability of this scheme with respect to Crossrail (under the Mayor’s Crossrail SPG.) The practical effect of this will be that only the larger of the two amounts will normally be sought.

**Summary**

TfL has no objections in principle to the proposed development. To ensure compliance with the London Plan transport policies, there are a number of detailed matters which need to be clarified and addressed either at this stage or during subsequent design and any permission granted should be subject to conditions and S106 provisions covering various transport matters. These comprise the provision of appropriate Blue Badge and car club parking, EVCPs, cycle parking, real time public transport information, staff cyclist facilities, drop off/pick up facilities including for taxis, a site for a cycle hire docking station together with suitable CPMP, SMP and CLP. Travel Plans, the car club, wayfinding and the exemption of residents and staff from obtaining parking permits should be included in the section 106 agreement. Furthermore the approach to agreeing the scope of works and process for funding and implementing new accesses and improvements to Great Eastern Road and the public realm needs to be secured.

**Local planning authority’s position**

This is not known at this stage.

**Legal considerations**

Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the London Legacy Development Corporation 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 London Legacy Development Corporation under Article 6 of the Order to refuse the application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor’s statement and comments.

**Financial considerations**

There are no financial considerations at this stage.

**Conclusion**

London Plan policies on the 2012 Games and their legacy, mix of uses, offices, retail, housing and affordable housing, urban design, inclusive design, sustainability, energy and transport. The application complies with some of these policies but not with others for the reasons set out above. On balance, the application does not comply with the London Plan, but the changes suggested below might remedy these deficiencies, and could possibly lead to it becoming compliant with the London Plan:

- **The 2012 Games and their legacy** - The proposals are welcomed in strategic planning terms, but the applicant should propose and confirm practical measures to ensure its proposals would help achieve convergence outcomes.
- **Offices** - The proposed net loss of office floorspace and the residential use of Morgan House is acceptable in strategic planning terms.
• **Retail** – The introduction of additional retail accommodation is strongly supported, however the applicant should show how its proposals would provide or support affordable shop units suitable for small or independent retailers.

• **Housing** – The provision of new residential accommodation is strongly supported however the application does not comply with the London Plan as it does not demonstrate that the maximum reasonable level of affordable housing would be provided, compliance with the Mayor’s residential standards has not been demonstrated and the quantum of dedicated children’s play space appears insufficient.

• **Urban design** – The overall massing, height and architectural treatment of the scheme is supported in strategic planning terms.

• **Inclusive access** – The scheme does not comply with the London Plan for the detailed reasons set out above.

• **Sustainable development** – The submitted environmental documentation in respect of noise and vibration, air quality, archaeology, groundwater and contamination, water resources, flood risk and drainage, microclimate, daylight and sunlight and waste is considered satisfactory from a strategic planning perspective.

• **Energy** – The detailed matters set above should be fully addressed.

• **Transport** - TfL has no objections to the principle of the proposed development but the outstanding details set out above need to be resolved in order to demonstrate full compliance with relevant London Plan policies.

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