

19 March 2018

The Chocolate Factory & Parma House, Wood Green

in the London Borough of Haringey

planning application no. HGY/2017/3020

Strategic planning application stage 1 referral

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

The proposal

Partial demolition, change of use and extension of the Chocolate Factory buildings. Demolition of the remaining buildings and redevelopment to create four new buildings ranging in height from 3 up to 18 storeys. Mixed-use development comprising 10,657 sq.m. of commercial floorspace, 230 residential units together with associated residential and commercial car parking, public realm works and access.

The applicant

The applicant is **Workspace Management Ltd** and the architect is **Barton Willmore**.

Strategic issues

Principle of development: the proposed intensification of the site for employment-led, mixed-use redevelopment, including affordable workspace and a significant proportion of affordable housing, is strongly supported in principle, subject to appropriate planning conditions and/or obligations securing the proposed affordable workspace provision and a robust relocation strategy with funding to support for existing occupiers where necessary.

Affordable housing: the affordable housing offer has been increased from 7% to 35% affordable housing (58% London Affordable Rent, 42% London Living Rent). This represents a betterment of 28% over the maximum level that is viable at the current time. In accordance with the Policy H6 of the draft London Plan and the Mayor's Affordable Housing and Viability SPG, the Council has confirmed that an early and late stage review will also be secured by planning obligation.

Further revisions and discussion is sought with respect to the above-mentioned points, and others associated with residential quality, children's play space, inclusive access, energy, and transport.

Recommendation

That Haringey Council be advised that whilst the application is broadly supported in strategic planning terms, it does not fully comply with the London Plan and draft London Plan for the reasons set out in paragraph 47 of this report.

Context

1 On 1 November 2017 the Mayor of London received documents from Haringey Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Following further discussions with key stakeholders, revisions to the application were proposed and these were received by GLA officers on 23 February 2018. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor must provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. 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 categories 1a, 1b and 1c of the Schedule to the Order 2008:

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

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

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

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

Site description

6 The application site is located south west of Wood Green Metropolitan Town Centre in the London Borough of Haringey and is the focus of the Wood Green Cultural Quarter. The site currently accommodates a cluster of buildings of differing size and scale, ranging from one to five storeys in height and predominantly occupied by artists and creative businesses. The buildings sit within an urban block accessed by Clarendon Road from the south and defined by Western Road, Coburg Road and Mayes Road. The site records a public transport accessibility level of 4, on a scale of 0 to 6, where 6 is excellent.

7 The main part of the site comprises the former Barratt's Confectionary Factory which dates to 1904 and is now referred to as the Chocolate Factory. Parma House is a four storey building constructed in the 1980s located on the eastern side of Clarendon Road. The Chocolate Factory and Parma House buildings currently provide a variety of workspaces suitable for a wide range of studio, office and workshop uses. The Wood Green Common Conservation Area adjoins the application site to the north.

8 The Chocolate Factory and Parma House buildings are within a Local Employment Area: Regeneration Area as identified by the Council's Strategic Policies DPD (2017) and form part of Site Allocation 19: Wood Green Cultural Quarter (South) as identified in the Council's Site Allocations DPD (July 2017), which states the allocation is for the *"enhancement of the Wood Green Cultural Quarter through improvements to Chocolate Factory and creation of high quality urban realm. Comprehensive redevelopment of the remaining sites for employment-led, mixed-use development with residential."*

Details of the proposal

9 The proposals seek the partial demolition, refurbishment, change of use and extension of the Chocolate Factory building and the demolition of all other buildings including Parma House to enable the construction of four new buildings ranging from three to eighteen storeys in height to deliver the mixed-use redevelopment of the site comprising 10,657 sq.m. of flexible commercial floorspace including A1, A3, B1, D1 and D2 uses and 230 residential units with associated car parking and public realm works. The proposed new buildings will range from three to sixteen storeys in height.

Case history

10 The applicant engaged in pre-application discussions with the GLA in November 2013 and June 2016 to discuss the potential redevelopment of the site, building on the success of the Chocolate Factory and to secure its offer to the wider Cultural Quarter in the long term. The principal of the masterplan approach to deliver a mixed-use scheme, including the retention of the Chocolate Factory building, comprising commercial workspace and residential was supported in principle subject to any proposals successfully responding to the existing and future development context, in addition to appropriate mechanisms being secured to ensure that the existing cultural offer and businesses remain viable through the provision of a proportion of affordable workspace and a business decanting strategy. The applicant was also advised that a significant proportion of affordable housing onsite would be expected and supported by a financial viability assessment. Other strategic issues with regards to housing quality, urban design, children's play space, inclusive access, sustainability and transport were also raised and expected to be addressed as part of any future planning application.

Strategic planning issues and relevant policies and guidance

11 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is made up of Haringey's Strategic Policies DPD (July 2017), Development Management DPD (July 2017), and Site Allocations DPD (July 2017); and the 2016 London Plan (Consolidated with Alterations since 2011).

12 The following are also relevant material considerations:

- The National Planning Policy Framework;
- The draft National Planning Policy Framework;
- and National Planning Practice Guidance;
- Draft London Plan (consultation draft December 2017);
- The Wood Green Area Action Plan (Regulation 18 Preferred Option Consultation Draft, February 2017).;
- Principle of development *London Plan*;

- Housing & affordable housing *London Plan; Housing SPG; Housing Strategy; Affordable Housing & Viability SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG; Shaping Neighbourhoods: Character and Context SPG;*
- Urban design *London Plan; Shaping Neighbourhoods: Character and Context, draft SPG; Housing SPG; London Housing Design Guide; Shaping Neighbourhoods: Play and Informal Recreation SPG;*
- Inclusive access *London Plan; Accessible London: achieving an inclusive environment SPG;*
- Sustainable development *London Plan; Sustainable Design and Construction SPG; Mayor's Climate Change Adaptation Strategy; Mayor's Climate Change Mitigation and Energy Strategy; Mayor's Water Strategy;*
- Transport *London Plan; the Mayor's Transport Strategy.*

Principle of development

Mixed-use redevelopment

13 The Wood Green Cultural Quarter is identified in the draft new London Plan as a key development site within the Wood Green/Haringey Heartlands Opportunity Area (OA), which is an area that will deliver a range of development opportunities to create a revitalised employment-led town centre. Mixed-use regeneration of key sites within the OA should deliver expanded employment, retail and leisure offers, in addition to new homes. As set out above in paragraph 8, Haringey Council's Site Allocation DPD identifies the Chocolate Factory and Parma House buildings as performing a special employment function and being located within a wider site suitable for comprehensive employment-led, mixed-use redevelopment with residential, including improvements to the Chocolate Factory building and the creation of high quality public realm to enhance the Wood Green Cultural Quarter.

14 Local policy requires that development of the site demonstrates the maximum quantum of employment floorspace is provided, subject to viability, and sets out an indicative development capacity of 355 homes and 12,243 sq.m. employment floorspace for the wider site including the buildings fronting Clarendon Road that are outside of the application boundary. The application site currently provides approximately 18,000 sq.m. of employment floorspace in the form of a range of different workshop and business facilities, although it is noted that approximately 20% of the floorspace is unlet due to it not meeting modern commercial requirements, and therefore it is recognised that the principle of a reduction in employment floorspace as part of the intensification of the site to enable competing local and strategic policy aims with regards to housing and affordable delivery, and public realm enhancements to be met through mixed-use redevelopment, is supported by local policy and generally accords with the broad principles set out in policies SD1 and H1 of the draft London Plan.

15 The proposed redevelopment of the application site, which comprises 68% of the total site allocation area, would deliver 10,657 sq.m. of commercial floorspace and 230 residential units. This equates to 65% of the residential quantum and 87% of the employment yield envisaged by the wider site allocation and therefore responds positively to the local policy requirement for employment-led, mixed-use redevelopment in this location. Moreover, as discussed in the urban design section below, officers are satisfied that the remaining development capacity of the wider site allocation could be delivered at a later date, without risk of prejudice from this proposal. The employment floorspace is proposed on a flexible basis and

includes A1, A3, B1, D1 and D2 floorspace with the maximum quantum of retail and leisure uses to be capped at 673 sq.m. and 570 sq.m. respectively, and the potential for all of the proposed floorspace to be delivered as B1 use class. Officers note that the proposed B1 floorspace includes research and development and light industrial uses which is welcomed. The applicant must however demonstrate that a proportion of the employment floorspace will be of an appropriate specification to fully accommodate the full range of B1 uses classes; i.e. floor loading, goods lifts, ventilation etc., in addition to providing existing and proposed employment densities for comparison. Furthermore, additional detail must also be provided to demonstrate that the diverse range of uses that currently operate on site could be accommodated within the reprovided workspace and to support the unique character of the Cultural Quarter.

Low-cost and affordable workspace

16 Policies E2 and E3 of the draft London Plan seek to protect low-cost and affordable workspace, including space used for creative and artist studios, in areas where there is an identified shortage. Specifically, any proposals that involve the loss of low-cost B1 space on sites where there is demand for workspace or viable existing business uses, development proposals should deliver an equivalent amount of B1 space through intensification or reconfiguration of space incorporating existing businesses where possible, or in exceptional circumstances where it has been demonstrated that it is not feasible to accommodate replacement workspace and existing businesses on-site, demonstrate that suitable alternative accommodation is available in reasonable proximity to the development and provide appropriate relocation support for any displaced tenants prior to the commencement of development. Furthermore, planning obligations to secure affordable workspace at rents maintained below the market rate for specific sectors that have social or cultural value such as charities and social enterprises, or artists' studios and designer-maker spaces, may be used where there is existing affordable workspace on site and in locations where the provision of affordable workspace would be necessary or desirable to sustain a mix of business or cultural uses which contribute to the character of an area.

17 The Chocolate Factory complex currently provides an element of low cost studio space for the creative industries and artists, of which there is an identified London wide shortage as indicated by the GLA Artist Workspace Study (2014), including space occupied by an arts charity and a theatre school, although it is understood the latter intends to relocate to South London. As recognised in the submitted commercial strategy, the current mix of creative uses and artist studios located on the application site clearly contribute towards the specific character of the area which is recognised in its designation as part of Wood Green Cultural Quarter and is supported by the availability of suitable affordable workspace. Therefore, following further discussions, and in response to Policy E3 of the draft London Plan, the applicant has committed to delivering 1,014 sq.m. of the replacement employment floorspace (approximately 10% of the re-provision) as affordable workspace and to be let at a 25% discount to market rent, with the arts charity given first priority to occupy this space.

18 In addition to the above, the supporting commercial strategy sets out a commitment prior to the commencement of development to assist existing tenants with a review of their accommodation requirements and how they may either be accommodated within the development subject to phasing; support existing occupiers to relocate to equivalent space within the applicant's existing portfolio; or support relocation to equivalent accommodation in the Wood Green or Hornsey area on a meantime or permanent basis; in addition to establishing a £500,000 fund to provide support with reasonable relocation expenses where appropriate. Whilst this strategy reflects the general approach set out in Policy E3 of the draft London Plan, GLA officers seek further discussion with the Council and the applicant to ensure that this strategy is suitably robust and would ensure a fair deal for existing occupiers.

19 In summary, the proposed intensification of the site for employment-led, mixed-use redevelopment is supported in principle by strategic and local planning policy, subject to it being satisfactorily demonstrated that the diverse range of uses that currently exist on site could be accommodated within the reprovided workspace, in addition to appropriate planning conditions and/or obligations securing the proposed affordable workspace provision and a robust relocation strategy with funding to support existing occupiers where necessary.

Housing

20 The proposed development would deliver 230 residential units with the following mix.

<i>Unit type</i>	<i>No. units</i>	<i>% mix</i>
Studio	29	13%
1 bed	98	42%
2 bed	72	31%
3 bed	29	13%
4 bed	2	1%
<i>Totals</i>	<i>230</i>	<i>100%</i>

Affordable housing

21 London Plan Policies 3.11 and 3.12 and policies H5 and H6 the draft London Plan and the detailed guidance in the Mayor’s Affordable Housing and Viability SPG seek to maximise the delivery of affordable housing, setting a strategic target of 50% across London and establishes a minimum pan-London threshold level of 35% affordable housing (without grant), or 50% on former industrial sites such as the application site. Strategic policy and guidance also sets out a preferred tenure split of at least 30% low cost rent (Social Rent/London Affordable Rent), at least 30% intermediate (with London Living Rent and London Shared Ownership being the default tenures), and the remaining 40% to be determined by the Local Planning Authority.

22 A financial viability assessment (FVA) has been submitted to the Council and GLA officers for review which sets out that the maximum level of affordable housing the scheme could viably deliver at the current time is 7% on a floorspace basis, assuming a 60:40 tenure split between social rented and intermediate housing. This low figure is attributed to the high levels of commercial floorspace proposed (in response to policy requirements) and the high existing use value (EUV) associated with the successfully operating employment use at the site. Following rigorous assessment by the Council’s independent advisors and GLA officers, it has been concluded that this represents maximum level of affordable housing that the proposed scheme can viably support at the current time. Notwithstanding this, and following further negotiation, the applicant has committed to providing 35% affordable housing on a habitable room basis, of which 58% would be London Affordable Rent and 42% London Living Rent, in accordance with the Mayor’s tenure split parameters, as set out in Policy H7 of the draft London Plan, and representing a significant betterment of 28% over the maximum level before growth. The proposed tenures will be secured by planning obligation and GLA officers will work with the Council to secure affordability in line with the guidance set out in the Mayor’s Homes for Londoners Affordable Homes Programme 2016-21 funding guidance and the published benchmark London Living Rent levels. On this basis, the growth-based affordable housing contribution of 35% (significantly above the 7% provision that has been independently verified as the maximum amount) has effectively secured and front-loaded potential growth, ensuring that a larger proportion of on-site affordable housing would be delivered by the scheme from the outset. This is strongly supported.

23 In accordance with the Policy H6 of the draft London Plan and the Mayor’s Affordable Housing and Viability SPG, early and late stage reviews will also be secured by planning obligation.

The Council must publish the financial viability assessment including any review, in accordance with the SPG and to ensure transparency of information. In addition to the above, and in line with London Plan Policy 3.12, draft London Plan Policy H6 and the Affordable Housing and Viability SPG, the applicant will be expected to explore all opportunities to secure grant funding to boost affordable housing supply above the maximum reasonable amount.

Residential quality

24 The proposed residential quality will be of a generally high standard, with an efficient core to unit ratio and the use of deck access to avoid any north facing single aspect units. The proposals include a range of unit sizes, including ground floor duplex units to accommodate larger families which is welcomed. All of the units will meet and exceed the London Plan and draft London Plan space standards and will have access to private amenity space in the form of gardens, terraces or balconies. The applicant should however, provide a detailed assessment demonstrating how the proposed residential units respond to the residential design standards set out in Part D of Policy D4 of the draft London Plan.

25 A noise assessment has been carried out which indicates that all habitable rooms would achieve compliant internal noise levels through appropriate façade engineering and that acceptable levels of noise on external balconies can be achieved through the use of solid balustrades where required. The appropriate mitigation measures should be secured by planning condition.

26 It is noted that the scheme has been amended to address concerns raised by the Council relating to windowless kitchen areas and the ability to include 'scissored' duplex units in Block E. Providing direct access to the amenity deck for family sized units should be prioritised where feasible and the applicant should explore slimming down the western portion of Block E to achieve this. The single aspect units fronting onto the communal garden at podium level could be redistributed across the scheme to enable this. The applicant should confirm that all units now have open kitchen areas, as the two south facing duplexes in Block E still appear to have enclosed kitchen/dining areas.

Children's play space

27 The London Plan, draft London Plan and Shaping Neighbourhoods: Play and Informal Recreation SPG require residential developments to incorporate good-quality, accessible play provision for all ages and to deliver safe, stimulating, accessible and green environments that are integral to their surrounding neighbourhood. The applicant has calculated a maximum child yield of 74 children for the proposed development. This equates to a minimum play space requirement of 743 sq.m. for the proposals based on 10 sq.m. per child.

28 The scheme would deliver 888 sq.m. of play space within the landscaped communal podium courtyard of Block E and in the roof terraces of Block E and D. These spaces will provide a mixture of informal, natural play features and more formal 'play lawns' including climbing structures, sensory mazes and mini roundabouts. On this basis, the proposed play strategy meets the minimum onsite play space requirement for younger children and is supported. The applicant has also identified several nearby parks and open spaces including Alexandra Park, which provide a number of recreational facilities suitable for older children. However, easy access to Alexandra Park, the largest open space, is significantly impeded by the East Midlands/Kings Cross railway line. The applicant has provided a study demonstrating how Penstock Foot Tunnel, which provides a link from the site to the park, could be improved to provide an attractive and safe route and enhance access to this open space for the wider community, which is supported in accordance with Policy G4 of the draft London Plan. However, further clarification is required on the delivery of these improvements and how they would be secured as part of this planning application.

Urban design

29 The layout and massing principles of the masterplan are supported in general accordance with the good design principles outlined in policies D1, D2 and D6 of the draft London Plan and respond successfully to the wider Haringey Heartlands spatial framework. The simple arrangement of perimeter blocks and integration/refurbishment of the Chocolate Factory is based on sound place-making principles and forms a legible sequence of residential streets and defined areas of public realm, reflecting the qualitative aspects of residential design set out in para 3.4.11 of Policy D4 and Policy D7 of the draft London Plan. The applicant has demonstrated how the proposals will respond to future development scenarios (including the Safestore site to the east and the site adjoining Block D), with flexibility designed into the scheme to ensure that efficient servicing and pedestrian access can be achieved should the Safestore site not come forward for redevelopment. This is supported.

30 The scheme is designed to maximise the extent of active residential and commercial frontages onto the public realm, however, the northern flank of Block B is taken up by sub-station/servicing frontage. Given the prominence of this frontage on the approach from Wood Green Station, in accordance with Policy D7 of the draft London Plan, the applicant should explore relocating the sub-station to allow the residential core to be extended around the corner of the block to improve the relationship of this prominent frontage with the adjacent public realm.

31 The form and massing strategy is supported and responds well to both existing and emerging contexts. The additional height to Block B improves on its proportions and is consistent with the building's role as a landmark on the approach to the site from Wood Lane. The lower-rise blocks are scaled to create good enclosure to residential streets while allowing sunlight penetration to the public realm and communal courtyards.

32 The simple and refined architecture is strongly supported and draws successfully from the character and materials of the retained Chocolate Factory building in accordance with the general principles set out in policies D1 and HC1 of the draft London Plan. The Council is encouraged to secure key details including window reveals, parapets and facing materials to ensure an exemplary build quality is achieved.

Inclusive design

33 The applicant has provided an inclusive design statement which demonstrates how the proposals will deliver an inclusive environment that can be safely and easily navigated with dignity by all which is generally supported in accordance with Policy D3 of the draft London Plan, London Plan Policy 7.2 and the Accessible London SPG. The applicant should however ensure that the design of the seating proposed in the public realm is accessible and comfortable for all users and that appropriate measures are included to ensure that the shared surfaces are safe to navigate by all users. The Council should secure appropriate planning conditions to ensure the measures described within the access statement are delivered in the detailed design stages.

34 The applicant has committed to designing 10% of the residential units to Building Regulation standard M4(3) standards, with the remaining 90% designed to Building Regulation standard M4 (2) and sample flat layouts demonstrating compliance have been submitted. Overall, the application generally accords with London Plan Policy 7.2, policies D3 and D5 of the draft London Plan and the Accessible London SPG.

Sustainable development

Energy strategy

35 In accordance with the principles of London Plan Policy 5.2 and Policy SI2 of the draft London Plan, the applicant has submitted an energy statement, setting out how the development proposes to reduce carbon dioxide emissions. In summary, the proposed strategy comprises: energy efficiency measures (comprising a range of passive design features and demand reduction); a strategy to connect to the Wood Green district heating network (DHN) when available; and, renewable technologies (photovoltaic panels and air source heat pump). As an interim measure until the DHN is operational, the applicant proposes temporary boilers within each block. This is acceptable, however, the applicant should provide a site wide heat network fed by a centralised energy centre in order to provide appropriate DHN futureproofing and a single point of connection should the DHN not come forward.

36 The current scheme would meet the minimum onsite carbon reduction targets set within London Plan Policy 5.2 and Policy SI2 of the draft London Plan for the domestic and non-domestic uses. Detailed comments have been issued directly to the applicant and the Council requesting clarification on the overheating study, energy efficiency modelling, the site heat network and combined heat and power which must be addressed prior to the Mayor's determination at the final decision-making stage. Following the resolution of the outstanding energy issues, any shortfall in carbon savings below the zero-carbon target for the domestic element should be offset through financial contributions to the Council's carbon offset funds.

Transport

Car and cycle parking

37 A total of 27 car parking spaces are proposed for the residential element of the development, of which 25 will be accessible, which equates to a parking ratio of 0.12 spaces per unit which is compliant with the London Plan and draft London Plan maximum standards. The existing seven commercial car parking bays along Clarendon Road are to be reconfigured but retained for businesses on site and in the surrounding area. In addition, two off-street accessible car parking spaces will be provided for the commercial element of the development. The development will result in an overall reduction in commercial car parking which is supported.

38 With regards to cycle parking, a total of 448 cycle parking spaces (405 long stay plus 43 short stay) are proposed, which meets the London Plan minimum standards for the development. However, the draft London Plan requires higher minimum levels of cycle parking in Outer London Metropolitan Town Centres and this provision is below the draft London Plan minimum requirement of 570 cycle parking spaces (519 long stay and 51 short stay). The applicant should engage with Transport for London (TfL) to increase this up to the draft London Plan minimum standards. Furthermore, all cycle parking and access should be designed in accordance with London Cycling Design Standards.

Walking

39 A pedestrian environment review system (PERS) assessment has been undertaken within the findings included as an appendix to the transport assessment. In line with the Mayor's Healthy Streets approach, the Council should draw upon the PERS assessment to prioritise investment in the pedestrian environment and to seek section 106 contributions accordingly.

40 Pedestrian wayfinding signage for the proposals should be funded and secured through the section 106 Agreement and Transport for London (TfL) recommends that Legible London signage is used and that the Council coordinates the signage with that forthcoming with nearby developments.

Freight

41 The Applicant has not provided an outline construction logistics plan (CLP). However, the environmental statement contains a chapter on construction methodology and phasing, however, this supporting information falls short of the requirements of the outline construction plan guidance and this must therefore be addressed. A detailed CLP must also be secured by pre-commencement planning condition in addition to a full delivery and servicing plan.

Crossrail

42 The site is within the Crossrail 2 safeguarded area and in such cases TfL/Crossrail 2 will require planning conditions requiring details of foundation design and noise mitigation.

Community Infrastructure Levy

43 In accordance with London Plan Policy 8.3 and Policy T9 of the draft London Plan, a contribution towards the Mayor's Community Infrastructure Levy (CIL) must be secured.

Local planning authority's position

44 The Council is generally supportive of the proposed development in principle. The application is scheduled to be heard at planning committee on 20 March 2018.

Legal considerations

45 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

46 There are no financial considerations at this stage.

Conclusion

47 London Plan and draft London Plan policies on opportunity areas, housing, affordable housing, urban design, inclusive design, energy and transport are relevant to this application. The proposals do not fully comply with the London Plan and draft London Plan for the reasons set out below. The resolution of these issues could, nevertheless, lead to the application becoming compliant with the London Plan and draft London Plan:

- **Principle of development:** the proposed intensification of the site for employment-led, mixed-use redevelopment, including affordable workspace and a significant proportion of affordable housing, is strongly supported in principle, subject to appropriate planning conditions and/or obligations securing the proposed affordable workspace provision and a robust relocation strategy with funding to support existing occupiers where necessary.
- **Affordable housing:** the affordable housing offer has been increased from 7% to 35% affordable housing (58% London Affordable Rent, 42% London Living Rent). This represents a betterment of 28% over the maximum level that is viable at the current time. In accordance with the Policy H6 of the draft London Plan and the Mayor's Affordable Housing and Viability SPG, the Council has confirmed that an early and late stage review will also be secured by planning obligation.
- **Urban design:** the scheme is well designed and overall, the form, massing and layout responds positively to the existing and emerging context and is supported in accordance with the design policies set out in the London Plan and draft London Plan. The applicant is strongly encouraged to explore options to relocate the sub-station on the northern flank of Block B to improve the relationship between this prominent frontage and the surrounding public realm.
- **Inclusive design:** the applicant should ensure that the design of the seating proposed in the public realm is accessible and comfortable for all users. The Council should secure appropriate planning conditions to ensure the measures described within the access statement are delivered in the detailed design stages.
- **Energy:** the proposals meet the minimum onsite carbon reduction targets set within London Plan Policy 5.2 and Policy SI2 of the draft London Plan. GLA officers require further clarification on the overheating study, energy efficiency modelling, the site heat network and combined heat and power which must be addressed. Following the resolution of the outstanding energy issues, any shortfall in carbon savings below the zero-carbon target for the domestic element should be offset through financial contributions to the Council's carbon offset funds.
- **Transport:** the applicant should engage with TfL to increase the level of cycle parking to meet the minimum standards set out in the draft London Plan, in addition to Legible London signage and further detailed information regarding construction, logistics and servicing planning.

for further information, contact GLA Planning Team:

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