

# St. Katharine's Dock

in the London Borough of Tower Hamlets

planning application no. PA/06/2131

**Strategic planning application stage 1 referral** Town & Country Planning Act 1990 (as amended); Greater London Authority Act 1999; Town & Country Planning (Mayor of London) Order 2000

## The proposal

The application is made up of a number of elements including; the redevelopment of Commodity Quay to provide 23,373 square metres of office and 2,951 square metres of retail floorspace; the conversion of International House to provide 3,003 square of office and 2,985 square metres of ground floor retail space; alterations to the Tradewinds building to provide a new restaurant; improvements to the northern and southern gateways and a range of associated public realm works.

## The applicant

The applicant is **St. Katharine's Investment LP** and the architect is **Gaunt Francis**.

## Strategic issues

The application proposes the redevelopment of part of St. Katharine's Dock located on the **River Thames**. The application proposes to **intensify** this area by creating additional office and retail space with more active frontages on the docks' edge. There are however, a number of strategic planning issues that to be addressed in greater detail. In particular, the applicant has not provided substantive evidence to justify the **mix of uses** and the proposed the lack of housing. In addition, the applicant must provide; further detail on the **energy** strategy, **air quality** modelling, **living roofs** and **transport** measures, the applicant must also provide a **training and employment** strategy and a **contribution for community needs** including, healthcare and childcare.

## Recommendation

That Tower Hamlets Council be advised that the proposed lack of housing in this application does not comply with London Plan policies on mixed-use development and the Central Activities Zone. The applicant is requested to address this, and the other concerns set out in this report.

## Context

1 On 12 December 2006 Tower Hamlets Council consulted the Mayor of London on a proposal to develop the above site. This application has been held in abeyance. Following the submission of additional information Tower Hamlets re-consulted the Mayor of London on 22 April 2008 on the above planning application. Under the provisions of the Town & Country Planning (Mayor of London) Order 2000 the Mayor has the same opportunity as other statutory consultees

to comment on the proposal. This report sets out information for the Mayor's use in deciding what comments to make.

2 The application is referable under Category 1B of the Schedule to the Order: *"development which comprises or includes the erection of a building or buildings in Central London with a total floorspace of more than 20,000 sq.m*

3 If Tower Hamlets Council subsequently decides that it is minded to grant planning permission, it must first allow the Mayor an opportunity to decide whether to direct the Council to refuse permission.

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's comments on this case will be made available on the GLA website [www.london.gov.uk](http://www.london.gov.uk).

## **Site description**

6 St. Katharine's Docks are situated towards the southwestern end of the London Borough of Tower Hamlets. The West and Central Docks, to which the application relates, are bounded by Tower Bridge Approach to the west, East Smithfield to the north, the River Thames to the south and the East Dock. The application site covers approximately 4.83 hectares. The existing housing to the north, east and south sides of the East Dock are not part of the application site.

7 The site contains a number of historically significant built features, including: the dock walls, the early Victorian Grade II listed Dockmaster's House, bollards, dock/quay wall, retracting footbridge and Ivory House, the only remaining original warehouse building. Many buildings within St. Katharine's Docks were badly damaged during the Blitz, while a comprehensive redevelopment scheme by Taylor Woodrow in the early 1970s and 80s resulted in the loss of significantly more buildings of historical value on the site.

8 The application site comprises of a number of existing buildings including:

- International House – a 9 storey commercial development built in the 1970s in a style based upon the original warehouse buildings.
- Commodity Quay – this 6 storey commercial development was built originally for the London Commodity Exchange in the mid 1980s with access off East Smithfield.
- Marble Quay – built in the 1980s, this distinctive 3-storey 'Dutch' gabled structure currently accommodates a restaurant and office floorspace.
- Coronarium - this structure was built in 1977 to commemorate the Queen's Silver Jubilee.

9 The application site is located in the London Plan Central Activities Zone (CAZ), and the City Fringe Opportunity Area. The existing buildings provide a total 23,554 square metres of office floorspace and 1,562 square metres of retail floorspace.

10 The site has a public transport accessibility level of between 3 and 5, where 6 is the high and 1 is low. Commodity Quay and International House, which comprise the majority of the redevelopment, have a public transport accessibility level of 5. Tower Bridge Approach (A100) to the west, and East Smithfield (A1203) to the north form part of the Transport for London Road Network. Tower Hill Underground station, Tower Gateway DLR station and the National Rail station of Fenchurch Street are within walking distance. Five local bus services run on adjacent

roads. There is a river commuter service that calls at St Katharine’s Pier and operates between 06:30 and 20:30.

## Details of the proposal

11 The key elements of this application include:

- International House: Conversion of the ground floor to provide flexible retail space and an upgrade of the remaining office space.
- Commodity Quay: Demolition of the existing building and construction of a new part 9, part 10-storey modern office block, with ground floor retail space.
- Tradewinds: Refurbishment of the existing building to provide a modern restaurant building.
- Gateways: The provision of two new gateway entrances; in the southeastern and the northeastern sections of the site.
- Boardwalks: A new 2.5 metre pedestrian boardwalk around the West Docks.
- Dickens Inn: Public landscaping works at the outside of Dickens Inn.

	Existing (sq. m)		Proposed (sq. m)	
	Office	Retail	Office	Retail
International House	4,400	1,285	3,003	2,985
Commodity Quay	19,069	0	23,373	2,951
Tradewinds	85	277	52	437
<b>Totals</b>	<b>23,554</b>	<b>1,562</b>	<b>26,428</b>	<b>6,373</b>

## Case history

12 St. Katharine Docks is an early example of waterfront redevelopment in Britain. The obsolete dock buildings were substantially rebuilt in the 1960/70’s to accommodate a variety of land uses, including office and residential uses. More recently the landowner has embarked upon the regeneration of the docks. The first phase has recently been completed with the construction of the Richard Rogers designed commercial development, ‘Tower Bridge House’ in the northwest corner of West Dock. Because the development involved the office building in which the LDA were then located, it was considered that the Mayor had a conflict of interest in respect of the planning application. The decision-making role was therefore delegated to the Director of P&P.

13 On the 9 November 2006 the Director of Policy & Partnerships acting under delegated authority from the previous Mayor reviewed a planning application for St. Katharine’s Dock by the same applicant. The application proposed a significant increase in the development capacity of the site with a 40% increase in the total floorspace to 54,377 square metres. This application included 28,246 square metres of office space, 5,490 square metres of retail, food and drink uses, and 20,641 square metres of residential floorspace. This scheme would have resulted in the net loss of 8,863 square metres of commercial office floorspace.

14 This report concluded that, *“the development would help transform St. Katharine Dock into a vibrant place for people who work, live and visit the area. Particularly welcomed were the*

proposed works to improve pedestrian access into the site; the proposals to change the balance of land uses within the docks with a reduction in office accommodation and increase in retail floorspace; the introduction of a significant residential development; and general public realm improvements. Notwithstanding this, before being formally considered by the Director the following needed to be addressed: justification for the level of affordable housing provision; lack of balconies for affordable dwellings, further details on inclusive design; investigation into a site wide combined heat and power or combined cooling heat and power-led system, complemented by renewables; and a series of transport measures". Following comments on this scheme from all parties the applicant subsequently withdrew this application.

15 On 24 July 2007 the Director of Policy & Partnerships reviewed an amended application (Ref: PDU/1406a/01). This application proposed a number of alterations from the previous application including; redevelopment of Commodity Quay to provide office space with ground floor retail, the redevelopment of Devon House to provide 100 residential units, with ground floor community or retail space. The change of use of the ground floor of International House from office to retail, alterations to the Tradewinds yacht club and the introduction of a series of boardwalks around the West Docks.

16 This report concluded that *'The proposal redevelops part of St. Katharine's Dock on the River Thames. This application proposes to intensify the area by creating more housing and more active frontages on the docks' edge. This is potentially a well-designed proposal though there are aspects of the design that have to be revised. Further information is required on the energy strategy before formal consideration. TfL seek further details on the transport assessment. Amongst other London Plan policies, the proposal has had to address the Blue Ribbon Network, children's play spaces, equal access, housing mix and biodiversity.'*

17 A copy of the above mentioned report and representation is attached as an appendix.

18 This application was not withdrawn and has effectively been held in abeyance. The applicant has since made amendments to this scheme and these are now assessed in this report. The key amendments are the deletion of the redevelopment of Devon House, and improvements to the design and access arrangements at the southeastern gateway.

## **Strategic planning issues and relevant policies and guidance**

19 The relevant issues and corresponding policies are as follows:

- Economic development *London Plan; the Mayor's Economic Development Strategy*
- World city role *London Plan*
- Employment *London Plan; PPG4; draft PPS4; Industrial Capacity SPG*
- Urban design *London Plan; PPS1*
- Mix of uses *London Plan*
- Regeneration *London Plan; the Mayor's Economic Development Strategy*
- Parking *London Plan; the Mayor's Transport Strategy; PPG13*
- Biodiversity *London Plan; the Mayor's Biodiversity Strategy; Improving Londoner's Access to Nature: Implementation Report; PPS9*
- Access *London Plan; PPS1; Accessible London: achieving an inclusive environment SPG; Wheelchair Accessible Housing BPG*
- Air quality *London Plan; the Mayor's Air Quality Strategy; The Control of dust and emissions from construction and demolition BPG; PPS23*

- Sustainable development *London Plan; PPS, PPS Planning and Climate Change Supplement to PPS1; PPS3; PPG13; PPS22; the Mayor's Energy Strategy; Sustainable Design and Construction SPG*
- River Thames/flooding *London Plan; Mayor's draft Water Strategy; PPS25, RPG3B*

20 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 1998 Unitary Development Plan and the London Plan (Consolidated with Alterations since 2004).

21 The following are also relevant material considerations:

- In October 2007 the Secretary of State directed Tower Hamlets Council to withdraw the submitted Tower Hamlets Core Strategy, Development Control and Leaside Area Action Plan development plan documents. Currently the Council is working on a renewed Issues and Options consultation for the Core Strategy. In the interim the Council has adopted these withdrawn documents as 'Interim planning guidance for the purposes of development control'. However, as these documents are yet to be subject to public consultation, little weight can be afforded to them as development control documents.
- The draft City Fringe Opportunity Planning Framework that was put out for public consultation in February 2008.

## Land use

22 London Plan policy 3B.2 on 'Office demand and supply' seeks the renovation and renewal of existing stock to increase and enhance the quality and flexibility of London's office market. This application proposes a total commercial floor space of 32,801 square metres, which represents an overall increase of 7,685 square metres in commercial floorspace. The proposed increase in the quantum of office and retail space is London Plan compliant.

23 The application site is located within the Central Activities Zone (CAZ). London Plan policy 3B.3 and 5G.3 on 'Mixed-use development' and 'Central Activities: Offices' recognise that the CAZ forms part of the heart of London's world city offer. Development in this area should recognise that this is the country's most strategic office location and should secure adequate capacity to meet future demand. The projected increase in office-based employment within the CAZ could generate demand for nearly 3 million square metres of office floorspace.

24 Policies 3B.3 and 5G.3 state, that wherever increases in office floorspace are proposed they should provide for a mix of uses including housing. This mix should be secured unless it would demonstrably conflict with other policies in the plan. London Plan paragraph 5.178 also notes that there is a need to ensure local flexibility when implementing mixed-use policy in the complex CAZ land market.

25 Both the original application and the one now under consideration before it was revised included a range of housing. The first scheme reviewed by the Director of Policy & Partnerships Mayor on 9 November 2006 included 200 residential units in a 16-storey building at St. Katharine's point. Due to concerns about its impact on the historic dock setting this application was withdrawn.

26 The amended scheme, reviewed by the Director of Policy & Partnerships on 24 July 2007, removed the 16-storey building and proposed a 7-storey building at Devon House, which included 100 residential units. Similarly, there were concerns relating to the proposed layout and design of this building.

27 It is recognised that this scheme will make a significant contribution to an existing cluster of office activities. The draft City Fringe OAPF identifies St Katharines Dock as an area that is a potential exception to the mixed-use policy of the London Plan. In these instances the onus is on the developer to justify the absence of housing within the development, but the expectation is that where exceptions to the London Plan mixed-use policy are justified some contribution will be made to off-site housing provision.

28 Given the contribution this site will make to office provision within CAZ into London's world city role it is considered to be an exception to the need to provide on site residential uses. However in order to comply with policies 3B.3, 5G.3 and the draft City Fringe OAPF Tower Hamlets Council should seek a contribution to off-site housing provision.

## **Design**

29 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.

30 The pedestrian permeability and orientation is much improved over previous schemes, in particular the amendments to the southwestern gateway are welcomed. The proposed piazza spaces at the northwest corner and the southwest gateway, and the proposed boardwalks along the dock edge of International House are of a high quality. The design will ensure that people will be able to move in and out of St. Katharine's Dock with greater ease.

31 The new office block, Commodity Quay, is designed to a high standard. The proposed retail units on the ground floor will provide active uses along the boardwalk. There is however, a concern with the set back tenth floor of this building, which may benefit from being more appropriately incorporated within the overall design of this building.

32 The redevelopment of the lock building, Tradewinds, is welcomed. This proposal will add a public interface between this building and the surrounding public realm. Its design is open and inviting and therefore suitable for this highly public location.

33 In summary, the overall design quality of the proposal in its various aspects is high and will not adversely impact on the setting of St. Katharine's Dock and its listed buildings; Tower Bridge or on the Tower of London. The proposed design and layout is compliant with London Plan design policies.

## **Blue Ribbon Network**

34 The application proposes to utilise areas along the rivers edge for passive recreation and riverside walks. This element of the proposal is welcomed as access to the River Thames provides increased amenity for employees and visitors. This aspect of the scheme also has the dual benefit of increasing levels of activity along the river, thereby increasing surveillance and safety for people using this area in accordance with London Plan policy 4C.17 on increasing access alongside and to the Blue Ribbon Network. The application complies with London Plan policy and the Draft City Fringe OAPF which promotes the completion of a Thameside walk.

35 London Plan policy 4C.23 - Safety on and near to the Blue Ribbon Network, requires that any proposals for major developments along the network be accompanied by a safety and risk

assessment. The finalised design should ensure that there are no steep drops down to the water and that it represents a safe design in line with London Plan policy 4C.23.

## **Climate change measures**

36 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.

37 Policies 4A.2 to 4A.8 of the London Plan focus on how to mitigate climate change, and the carbon dioxide reduction targets that are necessary across London to achieve this.

### Energy assessment and sustainable design and construction (Policy 4A.2 and 4A.4)

38 The applicant has applied suitable software to demonstrate baseline carbon emissions for each of the buildings. The applicant has suggested a series of demand reduction and energy efficiency measures. However, carbon reductions should be related to each of these proposed measures and set against the demand reduction measures to 2006 building regulations, i.e. to the Target Emission Rate. This information should be provided by setting out a breakdown of heating, cooling and electricity against baseline emissions. This should be carried out for each of the buildings.

### Decentralised energy (Policies 4A.5 and 4A.6)

39 The particularities of the site and its proximity to the dock, limits the possibility of a district-heating network and it is accepted that this issue cannot be pursued further. As a consequence, each of the buildings will have their individual heating and cooling plant.

40 The current proposal does not include a residential element, which limits the possibilities of implementing a combined heat and power plant on-site. In addition, the inability to connect all loads and buildings together reduces the suitability of implementing a combined heat and power system for this site and building arrangement.

41 Cooling will be provided via heat pumps, which will be partially fed with ground water. Systems will be installed on a building-by-building basis.

### Renewable energy (Policy 4A.7)

42 The application includes a range of renewable energy technologies, which are set out in more detail below.

43 International house: Photovoltaic panels will be installed on the roof. The applicant must provide detail on the total area of photovoltaic panels and the subsequent carbon savings. In the addition, the application proposes to provide the buildings cooling and heating with air source heat pumps. The applicant should comment on the possibility of using the existing International House heating and cooling system.

44 Commodity Quay: A ground water heating and cooling system will be utilised. A borehole will be drilled under the building and water will be abstracted to heat and cool the building and then water will be discharged to the Dock. It is intended that heat pumps will be used in conjunction with this ground water system. This system will have a top-up chiller for those times

when there is insufficient cooling to be extracted from the ground. In addition, a back-up gas boiler will be installed. Solar thermal panels will be used to provide part of the domestic hot water requirements. The applicant should provide further detail on the amount of solar thermal panels and the subsequent carbon savings that will be achieved.

45 Tradewinds: Similarly to Commodity Quay, ground water will also be used along with heat pumps to provide heating and cooling.

46 The proposed renewable energy technologies would achieve an 8.87% reduction in carbon dioxide emissions. However, the applicant must provide further detail on the viability of using water from Katharine's dock for the purposes of heating and cooling. The applicant will also need to provide evidence of discussions with the relevant authorities. In addition, the applicant should provide more detail on how the proposed heating and cooling system would integrate into the building services of the relevant buildings.

### Summary

47 The scheme does not currently comply with London Plan policy. The application does not include sufficient detail on baseline modelling, energy efficiency measures, overall carbon savings related to the requirements of Part L of the 2006 Building Regulations and renewable energy technology detail.

## **Climate change adaptation**

48 Developments are required to be adaptable to the climate they will face over their lifetime and address the five principles set out in policy 4A.9 of the London Plan. Policies 4A.10 – 4A.18 cover strategic issues of the urban heat island effect and water use in particular and include development specific requirements to deal with these, including a water use target for residential development.

### Overheating (Policy 4A.10)

49 Heating and cooling requirements will be generated individually for each of the buildings through a ground source heating and cooling system. Roof mounted air handling units (with heat recovery devices) will provide ventilation to the offices within Commodity Quay. Passive solar design and nighttime ventilation is proposed for all buildings. In addition, solar shading mechanisms have been incorporated for all south-facing facades. The scheme complies with London Plan policy.

### Living roofs (Policy 4A.11)

50 The applicant will include a sedum and brown roof on the new build at Commodity Quay, which is welcomed. The applicant should provide further detail on both living roof types. The applicant should also provide justification as to why living roofs have not been proposed for International House and the Tradewinds buildings. The application does not comply with London Plan policies.

### Sustainable drainage and water conservation (Policy 4A.14 and 4A.15)

51 The application includes a 'rainwater drainage system' for hard the surface areas of the development that take advantage of the sites proximity to St. Katharine's Dock and the River Thames to disperse with water run off. The application also includes living roofs on Commodity House to improve drainage and storage of water. The application complies with London Plan policy.



## Transport

52 The site has a public transport accessibility level of between 3 and 5. In view of the high accessibility TfL welcomes the proposed reduction in car parking. The applicant should identify provision for disabled persons and ensure the adequate provision of blue badge accessible parking bays, which should be designed in accordance with access standards.

53 The provision of improved pedestrian routes within the development is supported and will serve to increase pedestrian permeability and route options. The provision of new thoroughfares and boardwalks is supported and should assist in spreading pedestrian flows around the site. The proposals to provide new paving and lighting throughout the site are also supported.

54 TfL welcomes the provision of 90 cycle parking spaces for the office building at Commodity Quay. However, the amended transport information does not include the provision of any cycle parking at International House, which should be provided in accordance with TfL's cycle parking standards. Cycle spaces for visitors should be conveniently located close to the proposed retail units.

55 The assessment of the walking environment should be revised to take account of the higher level of tourists that will be expected. It should also make assumptions about the additional number of offices employees from this development. Any revised assessment should identify any mitigation necessary.

56 The proposed development will generate more pedestrian and cycle trips, in terms of employees, visitors and tourists, than the existing situation. TfL therefore seeks a contribution of £150,000 from the applicant to provide an additional signalised pedestrian crossing on East Smithfield. This will be located immediately to the west of Thomas More Street and will mitigate the expected increase in bus patronage and improve access to nearby bus services.

57 There are four nearby bus stops on East Smithfield and Tower Bridge Approach, which should be upgraded to TfL accessibility standards. TfL suggests that the applicant carry out a survey on the condition of nearest stops, which should be agreed between the applicant, TfL and the local planning authority. In turn, the applicant should allow up to £10,000 per bus stop for upgrade works. This level of contribution should be secured through a section 106 agreement. TfL would welcome further discussion on these issues.

58 A signage strategy focused on access to and from transport nodes should also be implemented.

59 TfL welcomes the transport assessment's consideration of the impact of construction. TfL expects the development to be subject to a Construction Logistics Plan. It should investigate the feasibility of bulk material/waste transportation by water and seek to reduce the 14,600 forecast trips through modal shift or load consolidation, making use of the peaks in activity identified in the assessment.

60 The trip rate assessment does not take account of service trips and the assessment should be revised accordingly. The development should also be subject to a delivery and servicing plan which could include measures such as a site booking system to optimise use to avoid the peak hours on the network.

61 TfL expects the development to be subject to a travel plan to manage travel demand.

62 Subject to the above matters being resolved, TfL has no objections to the principle of the proposed application.

## **Air quality**

63 The proposed development does not appear to present a significant impact on local air quality. There are marginal increases in both nitrogen dioxide and fine particles but it is agreed that the impact of these and the traffic generated by the development is likely to be negligible.

**64** However, this application will result in new exposure being introduced into an area that already exceeds UK air quality objectives and is also predicted to exceed EU levels for nitrogen dioxide by 2010. This concern is not addressed by the submitted air quality assessment. This issue needs to be addressed before full permission is granted.

## **London Development Agency's comments**

65 The London Development Agency (LDA) supports the principle of a mixed-use scheme in this location. The LDA previously stated that this site had the opportunity to provide additional space within in the Central Activities Zone. In contrast to the previous application, this application now achieves an increase in office floorspace over a smaller development are, which is welcomed by the LDA. The proposal complies with the principal aims of the Economic Development Strategy and London Plan policy 3B.2 on Office demand and supply.

66 The LDA welcomes the provision of retail space within the scheme, which complies with London Plan Policy 5G.2. This proposal further enhances the role of the Central Activities Zone as the country's premier visitor destination, and realises opportunities for local communities and businesses.

67 The applicant has not included provision of a financial contribution to address community needs, including healthcare and childcare facilities as a means of tackling barriers to employment and so does not comply with London Plan policy 3A.17.

68 London Plan policy 3B.11 seeks to improve skills and employment opportunities for Londoners. London Plan policy 5G.2 aims to realise opportunities for local communities and businesses and London as a whole. Local residents and businesses should benefit from the creation of jobs resulting from the construction and operational phases of the development. Initiatives to create training and employment opportunities, and to utilise the goods and services of small and medium enterprises and local businesses have not been incorporated into the submitted application. This does not comply with London Plan policy.

69 This concern could be addressed by securing the provision of a training and employment strategy through a section 106 agreement.

70 In summary, the application does not comply with London Plan policy. The proposal does not include a contribution to address community needs, including healthcare and childcare facilities. The scheme does not include an employment and training strategy. The delivery of such requirements will assist in ensuring the regeneration benefits of the proposed development are maximised for local residents, and that the objectives of tackling barriers to employment are realised.

## **Local planning authority position**

71 The view of the local planning authority is not known at the time of writing this report.

## **Legal considerations**

72 Under the arrangements set out in article 3 of the Town and Country Planning (Mayor of London) Order 2000 the Mayor has an opportunity to make representations to Tower Hamlets Council at this stage. If the Council subsequently resolves to grant planning permission, it must allow the Mayor an opportunity to decide whether to direct it to refuse planning permission. 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 comments unless specifically stated.

## **Financial considerations**

73 There are no financial considerations at this stage.

## **Conclusion**

74 The application proposes the redevelopment and conversion of existing office and retail space in St. Katharine's Dock. The overall quantum of commercial space is well located, well designed and represents an increase beyond the existing provision. The commercial proposal is in line with the requirements of the London Plan.

75 The application achieves a high quality of design and access that will serve to further enhance London's world city role.

76 There are however, a number of strategic planning issues that need to be addressed in greater detail. In particular, whilst it is accepted that the site is an exception to the requirement to provide housing on site a contribution should be made to off-site provision.

77 In addition, the applicant must provide further detail on; the energy strategy, air quality modelling, living roofs and transport measures, the applicant must also provide a training and employment strategy and a contribution for community needs including, healthcare and childcare. Subject to the resolution of these issues the application would comply with London Plan policy.

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