

## Axion House, Silver Road

in the London Borough of Lewisham

planning application no. DC/18/109972

### Strategic planning application stage 1 referral

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

### The proposal

Demolition of existing warehouse buildings and construction of two buildings ranging from 4 – 15 storeys to provide 136 residential units and 740 sq.m. of flexible commercial uses.

### The applicant

The applicant is **London Square Development Ltd** and the architect is **PRP**.

### Strategic issues summary

**Principle of development:** The site is non-designated industrial land, is located within the Lewisham Town Centre and is not allocated within local policy for redevelopment. Whilst the principle of residential intensification of a town centre site is supported, the loss of non-designated industrial floorspace has not been adequately justified.

**Industrial land:** The draft London Plan seeks to protect non-designated industrial land and specifically designates Lewisham as a borough that should 'retain' its industrial capacity. The proposed development results in the loss of non-designated industrial floorspace. Whilst the lawful use of the site is Class B8 warehousing, it is acknowledged that access constraints may limit the continued use of the site for warehouses; however, the site was last occupied by studio and workspace providers (albeit without formal planning permission), which indicates demand exists for light industrial /studio uses on the town-centre site. The applicant has not sufficiently justified the loss of industrial floorspace in this location and must explore opportunities to guarantee re-provision of industrial capacity on the site, as required by London Plan Policy 4.4 and draft London Plan Policy E7.

**Housing:** It is proposed to provide 22% affordable housing, comprising 86% social rent and 14% shared ownership, which is wholly unacceptable. The proposed affordable offer fails to meet the 50% threshold level and the applicant must explore opportunities to increase the affordable housing offer, including through grant funding. Further information is also required on the proposed weekly social rent levels and on the shared ownership income thresholds.

Issues relating to **urban design, transport** and **energy** must also be addressed.

### Recommendation

That Lewisham Council be advised that the application does not comply with the London Plan and draft London Plan, for the reasons set out in paragraph 53. However, the resolution of those issues could lead to the application becoming compliant with the London Plan and draft London Plan.

## Context

1 On 10 January 2019 the Mayor of London received documents from the London Borough of Lewisham 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 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 Category 1B of the Schedule to the Order 2008:

- Category 1B: Development which comprises or includes the erection of a building or one or more of the following descriptions: a). the building is more than 25 metres height and is adjacent to the river Thames; b). the building is more than 150 metres high and is the City of London; c). the building is more than 30 metres high and is outside the City of London.

3 Once Lewisham 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 Mayor of London's statement on this case will be made available on the GLA website [www.london.gov.uk](http://www.london.gov.uk).

## Site description

5 The 0.49-hectare site lies on the southern side of Silver Road, bound by railway tracks to the south and to the west and the River Ravensbourne to the east. The site is accessed by a central gate in the north of the site, fronting Silver Road. Beyond the site, there are further residential developments to the north, east and west and commercial/industrial uses to the south, ranging between two and six storeys.

6 The site lies within Lewisham Town Centre and within an Area of Archaeological Priority. The Lewisham Town Centre Local Plan highlights the route to the eastern edge of the site, along the River Ravensbourne, which is to be part of the Waterlink Way. The railway lines to the south and west of the site are designated as a Site of Nature Conservation Interest (SINC). There are no conservation areas or listed buildings in the immediate vicinity.

7 There are two L-shaped single storey buildings on the site and a two-storey warehouse building. Until March 2017, the site was occupied by numerous small creative industry businesses albeit without planning permission; the Council consider the lawful use of the site to be Class B8. A planning application for the redevelopment of the site was withdrawn by the applicant in September 2018, following Lewisham Planning Committee's resolution to refuse the application. The present application is a resubmission of that application, with amendments to address the Committee's reasons for refusal (as set out at paragraph 11).

8 The application site is accessed from Silver Road, which is a borough-run no-through road. Elmira Street, also a borough highway, in turn connects with the A20, 330 metres north of the site. The A20 forms part of the Transport for London Road Network. Elmira Street is also proposed to form part of the Greenwich to Croydon Quietway route which incorporates several sections of the current Waterway Link National Cycle Route. The site has a PTAL rating of 6a, which indicates excellent accessibility.

## Details of the proposal

9 Planning permission is sought for the demolition of the existing warehouse buildings on site and development of two buildings, ranging from 4 storeys to 15 storeys, to provide 136 residential units and 740 sq.m (GIA) of flexible commercial uses (Classes B1/A1/A3/D2) at ground floor level. Associated landscaping works are also proposed.

**Table 1:** Existing and proposed land uses

	<b>Existing</b>	<b>Proposed</b>	<b>Total</b>
<b>Residential</b>	-	136 units	+ 136 units
<b>Commercial – Flexible B1/A1/A3/D2</b>	-	740 sq.m	+ 740 sq.m
<b>Commercial – B8</b>	2,172 sq.m	-	- 2,172 sq.m

## Case history

10 GLA Officers provided initial pre-application advice on this scheme on 20 February 2017 (GLA reference: D&P/4183/JA). GLA officers advised that the principle of the commercial and residential redevelopment of the site was supported in strategic terms; however, stated that the applicant would need to address London Plan policies regarding affordable housing, housing quality, urban design, children’s playspace, access, energy, flood risk, surface water drainage and transport in any future application.

11 An application for the redevelopment of the site for 153 residential units (including 29% affordable housing) in buildings of 4 to 15 storeys was considered by the Mayor at Stage 1 on 30 October 2017, which concluded that proposals did not yet comply with the London Plan but resolution of the issues could lead to the application’s compliance. The application was withdrawn by the applicant in September 2018 following the resolution of Lewisham Planning Committee to refuse the application due to impact on daylight/sunlight.

## Strategic planning issues and relevant policies and guidance

12 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is Lewisham Core Strategy, Site Allocations Local Plan (2013), Development Management Local Plan (2014) and the 2016 London Plan (Consolidated with Alterations since 2011).

13 The following are relevant material considerations:

- National Planning Policy Framework (July 2018);
- National Planning Policy Guidance; and
- Draft London Plan (December 2017) and the Mayor’s Suggested Changes (August 2018, which should be taken into account on the basis explained in the NPPF).

14 The relevant strategic issues and corresponding policies are as follows:

- Housing *London Plan; Affordable Housing and Viability SPG.*
- Industrial land *London Plan;*

- Urban design *London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG.*
- Inclusive design *London Plan; Accessible London: achieving an inclusive environment SPG.*
- Sustainable development *London Plan; Mayor's Environment Strategy;*
- Transport *London Plan; the Mayor's Transport Strategy; Land for Industry and Transport SPG.*

## **Principle of development**

15 The site lies within the Lewisham, Catford and New Cross Opportunity Area, where residential intensification is encouraged in areas of high accessibility and within a Town Centre. Furthermore, the site is located within the Lewisham Town Centre and has excellent accessibility. The principle of intensifying the site for residential-led redevelopment is, therefore, supported, in accordance with London Plan Policy 2.15 and draft London Plan Policy SD6.

16 Notwithstanding this, however, the site is non-designed industrial land, within a borough which has been identified as needing to 'retain' its existing industrial capacity, as set out at table 6.2 of the draft London Plan, and has not been allocated for redevelopment in a local plan. Overall, the proposals would result in the loss of a minimum of 1,432 sq.m of industrial floorspace and the applicant has not adequately justified this loss or sought to guarantee the reprovision compatible industrial uses on the site, as required by draft London Plan Policy E7; industrial uses are considered in further detail in paragraphs 17 to 21.

## **Industrial land**

17 In recognition of the loss of a significant quantum of London's industrial floorspace over the last London Plan period, the draft London Plan has introduced further protection to London's existing stock of industrial floorspace and seeks to categorise boroughs by the status of their industrial land, where Lewisham is identified as a borough that should retain its existing capacity. Draft London Plan Policy E7 states that mixed-use or residential-led development on non-designated industrial land will be supported where: there is no reasonable prospect of the site being used for industrial and related purposes (Classes B1b, B1c, B2 and B8); it has been allocated in a local development plan document for residential or mixed-use development; or industrial, storage or distribution floorspace is provided as part of mixed-use intensification; or suitable alternative accommodation (in terms of type, fit-out, use and size) is available in reasonable proximity to the development proposal and subject to relocation agreements with the existing occupiers.

18 The lawful use of the site is Class B8. The site is not formally designated as industrial land within the Local Plan and is not allocated for residential or mixed-use redevelopment. It is proposed to provide 740 sq.m of flexible commercial floorspace; as such, the proposals result in the loss of a minimum of 1,432 sq.m of non-designated industrial land (were all of the proposed floorspace to be occupied as Class B1b or Class B1c), as set out in table 2.

**Table 2** – Comparison of existing and proposed commercial land uses

Land use	Existing	Proposed	Net change
Industrial warehouse (Class B8)	2,172 sq.m.		- 2,172 sq.m.
Flexible commercial (Classes B1,A1, A3, D2)		740 sq.m.	+ 740 sq.m.
Total			-1,432 sq.m.

19 In recognition of the site’s existing lawful use, the applicant has provided an Employment Land Report, which states that the existing buildings are substandard, close to residential uses and have constrained access, and concludes that it is not appropriate or worthwhile to market the site for its existing use (Class B8 warehouses). This is not considered to be sufficient justification for the loss of non-designated industrial land as it fails to accord with draft London Plan Policy E7, which is set out above. Whilst the site may not be suitable for large scale industrial uses due to the residential neighbours and access constraints, it may be appropriate for multiple smaller industrial businesses or start-ups.

20 Furthermore, it is acknowledged that the site was last used by V22, a studio and workspace space provider, to house 120 artists and creative enterprises for approximately two years. V22 vacated the site in March 2017. V22 occupy another site in the railway arches of Ladywell Bridge, approximately 0.6 miles to the south of the site; however, this is smaller than the space they previously occupied at Axion House. Whilst it is acknowledged that these occupiers were operating without planning permission and were outside of the site’s lawful B8 use, their presence suggests that there was demand for space for B1b/B1c industrial uses.

21 The applicant must provide further justification for the loss of non-designated industrial space on the site, in accordance with draft London Plan Policy E4. In recognition of the creative studios / workspaces who last occupied the site, the applicant should consider the reintroduction of these uses as part of the proposed ground floor flexible commercial space as well as ensure the quantum of this space is maximised.

## Housing

22 London Plan Policy 3.3 seeks to increase the supply of housing in the city and has set Lewisham a minimum target of 1,385 new homes per annum; the proposals would contribute 10% to meeting this. The residential element of the scheme is supported, subject to addressing concerns regarding the loss of industrial floorspace and the low affordable housing offer.

### Affordable housing

23 London Plan Policies 3.11 and 3.12 and draft London Plan Policy H5 and Policy H6 seek to maximise the delivery of affordable housing, setting a strategic target of 50% across London. The Mayor’s Affordable Housing and Viability Supplementary Planning Guidance seeks to increase the provision of affordable housing in London and embed affordable housing into land prices. The SPG introduced a threshold approach to viability, which is incorporated within draft London Plan Policy H6. Schemes on industrial land, where there is net loss of industrial floorspace, that provide 50% affordable housing and meet the specified tenure mix are not required to submit viability information nor be subject to a late stage review. At a local level, Lewisham Council’s Core Strategy sets a borough-wide strategic target of 50% affordable housing.

24 The applicant is proposing 28 affordable homes, equating to 21% by unit and 22% by habitable room, comprising 24 affordable rent and 4 intermediate tenure (shared ownership), which, in the absence of an agreed viability position, is wholly unacceptable. The affordable housing offer fails to meet the 50% threshold level for industrial land and does not replace the site's existing industrial floorspace; as such, GLA officers will robustly review the applicant's Financial Viability Assessment (FVA) to determine the maximum affordable housing that the scheme can provide. In the context of the low affordable housing offer and the loss of industrial land, the applicant must explore all opportunities to increase the affordable housing offer, including whether grant funding is available.

25 The affordable rented units are proposed to be let at Lewisham social rent levels. The applicant must confirm the weekly rental costs to enable a comparison against the London Affordable Rent levels. No details on the Shared Ownership products has been provided. For the avoidance of doubt, the Mayor is clear that these should be available to households on a range of incomes below the £90,000 threshold. The social rented units and their rental levels as well as the income thresholds or rental levels for the Intermediate units must be secured in any s106 agreement. Furthermore, the applicant must confirm whether they have engaged a Registered Provider to manage the affordable units.

26 If the proposals cannot be assessed under the Fast Track Route, a late stage review will also be required and secured within the S106. A draft of the S106 agreement must be agreed with GLA officers prior to any Stage II referral; example clauses are provided within the SPG.

27 The Council must publish any financial viability assessment, submitted to support a planning application, in accordance with the Mayor's Affordable Housing and Viability SPG. GLA officers will ensure that the assessment is made available, to ensure transparency of information.

#### Housing mix

28 London Plan Policy 3.8 and draft London Plan Policy H12 promote housing choice in terms of the mix of housing sizes and types, taking account of the housing requirements of different groups and the changing roles of different sectors in meeting these. London Plan Policy 3.11 and draft London Plan Policy H12 state that priority should be accorded to the provision of affordable family housing.

**Table 3:** Proposed housing mix and tenures

	<b>1 bed</b>	<b>2 bed</b>	<b>3 bed</b>	<b>Total</b>	<b>%</b>
<b>Market</b>	38	58	12	<b>108</b>	79
<b>Affordable rent</b>	9	7	8	<b>24</b>	18
<b>Shared ownership</b>	1	3	-	<b>4</b>	3
<b>Total</b>	<b>48</b>	<b>68</b>	<b>20</b>	<b>136</b>	100
<b>%</b>	35	50	15	100	

29 The scheme proposes 136 units; across all tenures, 15% are family-sized 3-bedroom units; however, when considering affordable units only, 29% are 3-bedroom units. Given the site's location in the Lewisham Town Centre area and its excellent transport accessibility, a predominately one and two-bedroom scheme is acceptable, with family accommodation appropriately prioritised within the

affordable element; this must, however, be accompanied by a significant affordable housing offer, as discussed above.

#### Inclusive access

30 London Plan Policy 3.8 and draft London Plan Policy D5 requires that at least 10% of units within new build schemes are wheelchair accessible and the remaining 90% are wheelchair adaptable. The scheme provides 10% wheelchair accessible dwellings and the applicant must confirm that these will be comprised of a range of unit sizes and be distributed throughout the building to ensure parity in choices for wheelchair users.

#### Children's playspace

31 London Plan Policy 3.6 and draft London Plan Policy S4 require development proposals to make provisions for play and informal recreation based on the expected child population generated by the scheme. The Play and Recreation SPG expects a minimum of 10 sq.m. per child to be provided in new developments.

32 The scheme proposes 360 sq.m. of playspace; 260 sq.m. at ground floor level and 100 sq.m. on the fourth-floor podium level, which complies with the minimum requirement on the site for 354 sq.m., as calculated using the GLA's play space calculator that accompanies the Play and Recreation SPG. The playspace should be retained in perpetuity and secured by condition.

### **Urban design**

33 The design of the proposed development is essentially identical to that of the previous scheme, however the applicant has responded to the concerns of the Planning Committee and has sought to make revisions to minimise any impact on adjacent homes' daylight and sunlight. In this regard, the comments raised below reiterate the comments raised in the Mayor's consultation response for the previous scheme.

34 The proposal involves the redevelopment of a linear site constrained by two sets of railway lines to the west and south, and the river to the east. The scheme has been subject to Lewisham Council design review panel and the building has been moved away from the railway line and the layout footprint adjusted in response to concerns raised by the panel. The applicant has opened up the river as a positive feature, which is supported and responds well to the ambitions of the London Plan Policy 7.24 and draft London Plan Policy SI16 for waterways and ensures the enhancement of the environment of the River Ravensbourne.

35 The concertina layout and massing configuration are generally well conceived and form an appropriate response to the site and its immediate context. The breaks in the building ensure that pedestrian access through the site as well as providing visual connections, which will also work to break up the massing of the buildings for pedestrians moving through the site.

36 The single point of vehicle/servicing access from Silver Road places constraints on the ability to provide safe and legible pedestrian/cycle access into, out of and throughout the site. The applicant must ensure that vehicle movements will be clearly delineated and separated from pedestrian and cycle routes, particularly at the access point from Silver Road, and in the north-west area of the site, where refuse collection and servicing is proposed. The applicant should provide a clear plan of this part of the site, showing how the vehicular, pedestrian and cycle movements areas are separated.

37 Connectivity with the wider area is important, particularly given the scale of development proposed, but is acknowledged as a challenge due to the site's constraints. Whilst a future river path

connection is indicated, the applicant recognises that its delivery is dependent upon other landowners and enabling access under railway lines and through private grounds and gardens. The applicant should provide further details regarding how accessible connections can be secured between the site and the wider area via Silver Road/Elmira Street and any deliverable alternatives. These should be secured by condition and/or legal agreement.

38 Details should also be provided of the proposed public realm/landscaping works to the river edge. The applicant has also provided an indicative plan of how development could be accommodated in the future on the adjacent site, owned by Network Rail. Whilst it is welcomed that the applicant has considered how the public realm of both schemes could interlink, the applicant must ensure that the boundary treatment on the southwest of the site works in both the scenario that the land comes forward but also if it does not.

39 The efficient floorplans at upper levels create a high residential quality, with predominantly east/west aspects and no more than eight units sharing the same core at each level. The applicant must also confirm that all units meet the minimum internal space standards.

40 The form and massing approach, with amendments to the floor-to-ceiling heights, building footprints and parapet heights, is supported as it should limit overshadowing onto both the public realm and neighbouring residential properties to the east of the site. Locating the tallest 15-storey block at the southern end of the site has the potential to mark the southern end of the town centre, while acknowledging a drop-in scale from the tall building cluster to the north.

41 The simple and refined architecture is supported, and the Council is encouraged to secure key details including window reveals, balconies and ground floor frontages to secure an exemplary build quality.

## **Energy**

42 The applicant has broadly followed the energy hierarchy; however, further information is required before the proposals can be considered acceptable. Evidence is required to demonstrate how London Plan Policy 5.9 and draft London Plan Policy S12 has been addressed to avoid overheating and minimise cooling demand for both residential and commercial elements, and carbon savings from passive design and energy efficiency measures for the commercial element should be fully investigated. The domestic buildings are required to meet the zero-carbon target; the applicant should therefore address the outstanding matters to maximise carbon savings with the remaining CO<sub>2</sub> emissions met through a contribution to the borough's offset fund to be included within the S106 agreement. The detailed technical comments have been sent to the applicant and the Council.

## **Air quality**

43 London Plan Policy 7.14 and draft London Plan Policy S11 seek to ensure that new development minimises increased exposure to existing poor air quality and makes provision to address local problems of air quality (particularly within Air Quality Management Areas (AQMAs)). Given the development's proximity to the railway lines, the applicant must confirm that the development complies with London Plan and draft London Plan policies, and appropriate mitigation should be secured by condition.

## **Noise**

44 London Plan Policy 7.15 and draft London Plan Policy D13 seek to reduce and manage noise associated with development, as well as mitigating and minimising the impact of existing noise on new development. It is acknowledged that the applicant has sought to mitigate against noise from surrounding roads and railway through design mitigation, such as double glazing and mechanical

ventilation. All proposed mitigation measures must be secured through condition and general noise conditions should also be appended.

## **Transport**

45 The development is to be car free, except for the blue badge spaces, which is supported; however, the design and layout of these spaces should be reviewed to ensure that they are suitable and convenient for disabled users. Of these spaces, 20% should be equipped with electric vehicle charging points, with the remainder for passive provision. All car parking management arrangements should be appropriately secured. A commitment that future residents would be unable to obtain parking permits within the surrounding Controlled Parking Zone (CPZ) should be secured within the s106 agreement.

46 Improvements for active travel (walking and cycling), including enhancing Silver Road itself and its junction with Elmira Street, are considered essential. As noted above, improvements to the pedestrian and cyclist experience and safety within the site are also required. These transport mitigations should be secured by design amendments, condition and legal agreement, as appropriate, and the applicant should engage with TfL officers and the Council on this point.

47 The development will rely upon public transport and active travel. Ahead of the Bakerloo Line extension, plans are being progressed for improvements to the capacity and accessibility of the nearby Lewisham Station. As with other sites in the area, a s106 contribution from the development may be justified to mitigate its impacts at the station and TfL will engage with the applicant to discuss this.

48 A total of 284 long and short stay cycle spaces are provided, which accords with London Plan and draft London Plan standards; however, the design and layout of the parking does not accord with the London Cycle Design Standards and this must be addressed.

49 A Framework Travel Plan has not been provided. A Travel Plan with ambitious targets (with associated measures) to support a mode shift towards active modes of travel must be secured, enforced, monitored and reviewed as part of a S106 legal agreement. A Construction Management/ Logistics and Delivery and Servicing Plans should also be secured by condition. The latter should set out measures to manage conflict between delivery and refuse vehicles and pedestrians and cyclists, who will use the same access off Silver Road and the shared surface within the development

50 In accordance with London Plan Policy 8.3, a contribution to Mayoral CIL must be secured; the level required should be confirmed by the applicant and Council once the components of the development have been finalised. It should be noted that if permission is granted after MCIL2 rates come into force in April 2019, these will apply.

## **Local planning authority's position**

51 Lewisham Council Planning Officers are intending to take the application to a February committee date.

## Legal considerations

52 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, 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.. 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.

## Conclusion

53 London Plan and draft London Plan policies on industrial land, housing, affordable housing, design, transport, energy and access are relevant to this application. The proposals do not currently comply with the London Plan. The following changes, however, might lead to the application becoming compliant:

- **Principle of development:** The site is non-designated industrial land, is located within the Lewisham Town Centre and is not allocated within local policy for redevelopment. Whilst the principle of residential intensification of a town centre site is supported, the loss of non-designated industrial floorspace has not been adequately justified.
- **Industrial land:** The draft London Plan seeks to protect non-designated industrial land and specifically designates Lewisham as a borough that should 'retain' its industrial capacity. The proposed development results in the loss of non-designated industrial floorspace. Whilst the lawful use of the site is Class B8 warehousing, it is acknowledged that access constraints may limit the continued use of the site for warehouses; however, the site was last occupied by studio and workspace providers (albeit without formal planning permission), which indicates demand exists for light industrial /studio uses on the town-centre site. The applicant has not sufficiently justified the loss of industrial floorspace in this location, as required by part D of draft London Plan Policy E7, and must explore opportunities to guarantee re-provision of industrial capacity on the site.
- **Housing:** It is proposed to provide 22% affordable housing, comprising 86% social rent and 14% shared ownership, which is wholly unacceptable. The proposed affordable offer fails to meet the 50% threshold level for schemes on industrial land that result in a net loss of industrial floorspace. The applicant must explore all opportunities to increase the affordable housing offer, including ascertaining whether grant funding is available. Further information is also required on the proposed weekly social rent levels and on the shared ownership income thresholds.
- **Design:** The applicant engaged positively in the pre-application process and the design is fundamentally unchanged since the scheme considered by the Mayor in October 2017; however, amendments have been made to the building's footprint, internal floor-to-ceiling heights and parapet heights to limit overshadowing onto surrounding residential uses, in recognition of Lewisham Committee's reasons for refusal for the previous scheme.
- **Energy:** The following are required: overheating and cooling information; further investigation of passive design and energy efficiency measures for the commercial elements; and details of the CO2 emissions offset payment.

- **Transport:** Design changes, contributions and conditions should be secured to ensure the promotion of active and sustainable travel, in line with Good Growth and Healthy Streets principles. A CPZ permit free obligation and the Travel Plan should be secured within the s106. Further information is required on the design and layout of cycle parking and Blue Badge parking must be reviewed.

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