### Strategic planning application stage 1 referral (new powers)


### The proposal

Detailed application for the retention, refurbishment and extension of Gnome House (no : 7 Blackhorse Lane) to provide 8 residential dwellings and change of use of ground floor to provide flexible A3/B1/D1 floor space; and demolition of all other buildings for mixed use redevelopment to provide blocks ranging from 3 – 8 storeys in height and comprising 475 residential dwelling (therefore a total of 483 dwellings) 519 rooms of student accommodation ( sui generis ) 1080sqm of commercial (A1/A3) floorspace and 305sqm of commercial (B1) floorspace with a linear park and associated landscaping access car and cycle parking and refuse and recycling storage.

### The applicant

The applicant is Hollivale Blackhorse Lane LLP and the architect is Pollard Thomas Edwards Architects.

### Strategic issues

The principle of a residential led mixed use development within this location is acceptable; however, further information and revisions with regard to affordable housing, housing choice, residential density and quality, children’s playspace, urban design, inclusive access, sustainable development and transport are required to address outstanding concerns, for the scheme to be considered as fully compliant with the London Plan.

### Recommendation

That Waltham Forest Council be advised that the application, on balance, does not yet fully comply with the London Plan for the reasons set out in paragraph 69 of this report; but that the possible remedies set out in this paragraph could address these deficiencies.

### Context

1 On 10 May 2013 the Mayor of London received documents from Waltham Forest Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor has until 21 June 2013 to provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor’s use in deciding what decision to make.
The application is referable under the following Categories of the Schedule to the Order 2008, as follows:

- **Category 1A** “Development which comprises or includes the provision of 150 houses, flats, or houses and flats”.
- **Category 1B (c)** “Development which comprises or includes the erection of a building or buildings outside Central London and with a total floorspace of more than 15,000 square metres”

Once Waltham Forest 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.

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**

The application site is 2.76 hectares in size and forms part of the wider Blackhorse Lane Industrial Estate. Forest Road lies to the south of the site, Blackhorse Lane to the east, Hooker’s Road to the north and the Lee Valley Regional Park and Walthamstow Reservoirs to the west. The surrounding area is predominantly industrial and an area of residential use lies to the east of the site. The site currently comprises a mix of industrial units and commercial buildings, which are currently largely vacant.

The closest section of the Transport for London Road Network (TLRN) is the A406, North Circular Road, located approximately 2km to the north. The closest section of the Strategic Road Network (SRN) is the A112, Chingford Road, located approximately 1.5km to the east.

Blackhorse Road station is approximately 100m south of the site. The station provides access to London Underground (Victoria Line) and London Overground services. Four bus services operate within reasonable walking distance of the site (Routes; 158, 123, 230 and W15) along Blackhorse Lane and/or Forest Road. As such, the site achieves a good public transport accessibility level (PTAL) of 4 (out of 1 to 6, where 6 is excellent).

Strategically, the site is located within the Upper Lee Valley Opportunity Area as set out in London Plan policy 2.13 and Map 2.4 and locally, the site is designated within the Blackhorse Lane Area Action Plan proposed submission document (December 2012).

**Details of the proposal**

The applicant is proposing to redevelop the exiting industrial site to deliver a residential led mixed use development comprising 483 residential dwellings, 519 rooms of student accommodation, 1, 080 sq.m. of commercial (A1/A3) floorspace and 305 sq.m. of commercial (B1) floorspace, a linear park and associated landscaping, access, car and cycle parking. This will be delivered in a number of blocks ranging from 3 - 8 storeys in height.

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

The relevant issues and corresponding policies are as follows:

- Principle of development London Plan
• Housing  London Plan; Housing SPG; Providing for Children and Young People’s Play and Informal Recreation SPG; Housing Strategy; draft Revised Housing Strategy;
• Affordable housing  London Plan; PPS3; Housing SPG, Housing Strategy; draft Revised Housing Strategy;
• Density  London Plan; PPS3; Housing SPG;
• Urban design  London Plan;
• Access  London Plan; Accessible London: achieving an inclusive environment SPG; Planning and Access for Disabled People: a good practice guide (ODPM)
• Sustainable development  London Plan; Mayor’s Climate Change Mitigation and Energy Strategy; Mayor’s Water Strategy; Sustainable Design and Construction SPG
• Transport  London Plan; the Mayor’s Transport Strategy/Crossrail London Plan/ Parking London Plan; the Mayor’s Transport Strategy;
• Parking  London Plan; the Mayor’s Transport Strategy; PPG13

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 the saved policies from the 2006 Waltham Forest Unitary Development Plan, the Waltham Forest Core Strategy (2012) and the London Plan (2011).

12 The following are also relevant material considerations:
   • Waltham Forest Blackhorse Lane Interim Planning Policy Statement (2006).
   • Blackhorse Lane Area Action Plan (proposed submission) (December 2012)
   • Waltham Forest Local Plan Development Management Policies (proposed submission) (July 2012).
   • The consultation draft Upper Lee Valley Opportunity Area Planning Framework (November 2012)
   • The National Planning Policy Framework
   • The draft Revised Early Minor Alterations

Principle of Development

13 As set out in paragraph 8, the site is found within the Upper Lee Valley Opportunity Area as designated on London Plan Map 2.4 and London Plan Annex One. London Plan policy 2.13 seeks development in opportunity areas to maximise residential and non-residential output and densities and contain a mix of uses as well as support wider regeneration objectives.

14 Annex One states that new developments in the Upper Lee Valley Opportunity Area have the scope to deliver an indicative capacity of 15,000 new jobs and a minimum of 9,000 new homes over the plan period to 2031.

15 Within the Upper Lee Valley Opportunity Area Planning Framework (OAPF) (consultation draft) the site is located in the Blackhorse Lane area, an identified growth area with the intention to deliver a new urban centre, 1,200 jobs and 2,000 new homes, as well as providing the stimulus
for regeneration of the wider area. In this document the site is designated for predominately residential use.

16 The provision of residential accommodation on this site is supported by London Plan Policy 3.3, which seeks to increase London’s supply of housing and in doing so sets a London-wide housing delivery target of 32,210 additional homes per year up to 2021. Table 3.1 sets borough housing targets, of which Waltham Forest’s is 7,600 additional homes per year between 2011 and 2021.

17 The development proposals put forward include 483 residential units and 1,385 sq.m. of commercial floorspace and therefore, will help achieve the delivery targets for jobs and homes expected in this Opportunity Area and will contribute towards meeting Waltham Forest’s housing target. The proposed development is supported in this regard.

Student Accommodation

18 The applicant is proposing to deliver student accommodation (519 rooms) as part of the scheme.

19 With regards to student housing, the London Plan recognises that the provision of purpose-built student housing may reduce pressure on other elements of the housing stock currently occupied by students, especially the private rented sector. In taking account of housing requirements London Plan policy 3.8 seeks to ensure that strategic and local requirements for student housing meet a demonstrable need and do not compromising capacity for conventional homes especially affordable family homes, or undermine policy to secure mixed and balanced communities.

20 As part of the planning submission the applicant has a Student Accommodation Demand Study which demonstrates that there is a significant demand and supply imbalance of student accommodation across London. It particularly notes that institutions can only provide 16.2% of the required accommodation and the study assumes a demand/supply scenario which highlights that there would be 209,416 full time students unable to access university-provided or private sector purpose built student accommodation, taking into consideration student accommodation schemes either consented and/or under construction.

21 The study also demonstrated that the site is very well located for the main London institutions, in particular London Metropolitan, UCL, SOAS and LSE and the applicant has made it clear that there are a number of universities that are currently seeking additional accommodation for first year, overseas and postgraduate students. These include LSE (700 beds), UCL (1,000 beds), Imperial College (1,000 beds), King’s College (1,500 beds) and University of Arts (1,000 beds).

22 The provision for student accommodation as an integral part of the proposed scheme is accepted in strategic terms. It should be noted, however, that before the scheme is referred back to the Mayor at stage two, the Council will need to secure the student accommodation by planning agreement relating to the use of the land or to its occupation by members of specified educational institutions.

Employment/commercial

23 The scheme is not located in a Strategic Industrial (SIL) Area as identified in the London Plan or in the draft ULV OAPF, which identifies the site a suitable for residential uses. As part of Waltham Forest’s LDF the site has been identified as a site suitable for mixed-use residential led regeneration through the Core Strategy and the Council’s Blackhorse Lane Area Action Plan, which
identifies the area as suitable for mixed-use development in line with the planning objectives to deliver a neighbourhood centre in the Blackhorse Lane area. In addition, the adopted Blackhorse Lane Interim Planning Policy Framework (2006) also seeks to promote mixed development in this location. The proposal includes 2,836 sq. m. of commercial floorspace, which is proposed to be a mix of retail and office uses; the employment/commercial uses as proposed are strategically acceptable in this regard.

Notwithstanding the above, it is recognised that the proposal will result in a net loss of 20,043 sq. m. employment floorspace. This is not a strategic concern, as the site is not designated or protected as Strategic Industrial Land and the draft ULV OAPF promotes residential uses; however, Waltham Forest Council will need to be satisfied that the site is not required to meet the employment needs of the borough and that the quantum of commercial space currently put forward is sufficient to meet local regeneration objectives.

It is understood that much of the existing commercial space is vacant; however, owing to the overall employment floorspace loss, before the scheme is referred back at stage two, the applicant will need to demonstrate whether or not any businesses will be displaced and how they will be relocated as a result of the proposals in line with London Plan policies.

### Housing

As stated in paragraph 17 of this report, the scheme in total will deliver 483 residential units; the residential mix is as follows:

<table>
<thead>
<tr>
<th>Dwelling Size</th>
<th>Private</th>
<th>Affordable</th>
<th>Total Units</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Affordable Rent</td>
<td>Shared Ownership</td>
</tr>
<tr>
<td>1-bedroom</td>
<td>128</td>
<td>0</td>
<td>9</td>
</tr>
<tr>
<td>2-bedroom</td>
<td>238</td>
<td>0</td>
<td>15</td>
</tr>
<tr>
<td>3-bedroom</td>
<td>61</td>
<td>18</td>
<td>12</td>
</tr>
<tr>
<td>4-bedroom</td>
<td>0</td>
<td>0</td>
<td>2</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>427 (88%)</td>
<td>18 (4%)</td>
<td>38 (8%)</td>
</tr>
</tbody>
</table>

Table one: Proposed residential mix

#### Affordable housing and tenure split

As shown in table one above, the applicant is proposing to deliver 56 affordable units which equates to a 12% provision on a unit basis, in order to comply with London Plan requirements, it is necessary to demonstrate that the maximum reasonable amount of affordable housing is being delivered.

The applicant has submitted a viability assessment which indicates that the scheme is delivering the maximum reasonable amount of affordable housing; however to fully comply to London Plan policies 3.11 and 3.12, before the scheme is referred back to the Mayor, the Council will need to independently assess the applicant’s viability work undertaken.

With regards to tenure split the applicant is proposing to deliver 18 (32%) affordable rented units and 38 (62%) intermediate units which is not compliant to the London Plan (60:40 split). Further discussions are needed in this regard and the applicant should revise the mix and
indicate any impact such a change will have on the viability and the overall quantum of affordable housing.

**Housing choice**

30 The overall mix is given in table one of this report; the scheme will be delivering predominately one and two bedroom units, 19% of units will be family accommodation. This is a reasonable mix for the overall proposals and the scheme meets London Plan policy 3.8 in this regard.

31 Notwithstanding the above, within the affordable provision, 32 units (57%) will be family units (3 bed plus), 18 of which will be within the affordable rented element and 14 will be intermediate units; this provision provides an adequate amount of family accommodation and the scheme is compliant with London Plan policies 3.8, 3.11 and the Mayor’s Housing SPG.

**Residential quality**

32 The residential quality of the scheme is generally high. All units meet the minimum space standards in line with London Plan policy 3.5, the high number of cores results in a good proportion of dual aspect units and a limited number of households sharing the same landing which is welcomed and in line with policy. However, there is concern with the lack of individual front entrances to ground floor units. The London Housing Design Guide sets out the need to provide individual ground floor entrances to all ground floor units that face the public realm, helping to add activity and animation to the public realm, create a more diverse mix of unit types and improve the legibility and quality of ground floor units. The applicant is advised to ensure that all ground floor units facing the public realm have their own individual entrances directly from the street rather than from shared cores.

**Density**

33 The site has a public transport accessibility level (PTAL) of four and has characteristics of an urban setting, as defined by the London Plan and therefore has an indicative density range of 200 – 700 hr/ha. The applicant proposes a residential density of 836 habitable rooms per hectare which fall above density targets set out in Table 3.2 and policy 3.4 in the London Plan.

34 It should be noted that the guidance on density as set out in the Housing SPG states that the density thresholds (Table 3.2) are not intended to be prescriptive and are dependent on other factors such as impact on townscape and quality of design. The architectural approach to the scheme is generally supported and the scheme will deliver a good residential quality; all units meet minimum spaces standards (in many instances exceeds standards), a large number will be dual aspect and adequate amounts of both private and public amenity space will be delivered, thus, ensuring a high residential quality for future residents.

**Children’s play space**

35 Policy 3.6 of the London Plan sets out that “development proposals that include housing should make provision for play and informal recreation, based on the expected child population generated by the scheme and an assessment of future needs.”

36 The scheme will provide communal gardens, a new green link and is located adjacent to the Lee Valley Park; however, the applicant has not given any further information regarding the child yield figures or any breakdown of play space provision.
37 Before the scheme is referred back at stage two the applicant will need to set out an estimate of the child occupancy by age group and the corresponding provision proposed in line with the Mayor’s supplementary planning guidance ‘Providing for Children and Young People’s Play and Informal Recreation’. The applicant should also set out details of the quantum and nature of private amenity spaces in the proposal so that it complies with London Plan policy 3.6.

Urban design

38 The proposal was subject to a pre-application stage, where a number of aspects of the scheme were commended including the retention of the Art Deco building, the creation of a legible and permeable urban structure and the use of perimeter block typologies. Whilst this is all welcomed, there are still a number of issues that need to be resolved as set out below.

39 Further clarification is required as to the applicant’s approach to the route on the southern edge of the student accommodation. This needs to be considered in relation to what is likely to be happening on the adjacent southern site. There is concern that if this is seen as a public route the proposed ground floor does not provide sufficient activity and overlooking to ensure this feels safe, attractive and well used and will need its layout revised.

40 The northern edge of the development faces Hookers Road, which is flanked to the north by industrial units unlikely to be redeveloped in the long term as these remain as SIL designation within the AAP. There is concern that the current design does not respond to this industrial edge appropriately; the quality of the residential units on the ground floor facing this street is likely to be compromised and an alternative layout where commercial units are used to interface between the industrial area to the north and the developing residential area to the south needs to be considered. Whilst attempts have been made to deal with this edge by locating a single commercial unit on one block and by building a wall at the rear of the residential units along the other, this is tokenistic and does not create a satisfactory interface between these areas. The applicant is strongly advised to locate small commercial units on the ground floor all the way along the southern edge of Hookers Road.

41 Other locations where the residential units are located on the ground floor looking on to industrial units are not as concerning as these sites are likely to be redeveloped in the short to medium term in accordance with the aspirations set out in the AAP.

42 The height of the scheme presents no strategic concerns, however the massing of the student accommodation seems bulky and overbearing, which is a concern. Illustrations showing how this will be perceived at ground level are required. If this still appears bulky, the applicant is advised to look into differentiating the separate sides of the perimeter block in a way that maintains the integrity and legibility of the building form but reduces its overall bulk.

43 The overall simple architectural approach of the scheme is generally supported. The use of brick as the main material reflects the industrial heritage of the area which is welcomed. The articulated roofline of the residential element creates a distinctive appearance which is also strongly supported. The applicant is advised to keep the architectural language simple and focus on creating elegant proportions of window opening and high quality detailing.

44 In summary, the design of the scheme is generally supported, but the applicant is advised to, reconsider the uses on the ground floor of the northern edge of the site; provide front entrances for ground floor units; clarify the layout of the southern edge of the student accommodation; and put further work into its architecture.
Inclusive access

45  The applicant has committed to achieving Lifetime Homes standards for all units proposed which is supported and in accordance with London Plan Policy 3.8. The Council should secure compliance with Lifetime Homes Standards through planning condition.

46  In addition, the scheme will deliver 10% wheelchair accessible units which is welcomed, but before the scheme is referred back at stage two the applicant will need to demonstrate where these are in the development to ensure these are across a mix of unit types and tenure in order to fully satisfy Policy 3.8. Further information will be needed in relation to inclusive access and the student accommodation.

47  The applicant has not provided any information as to how the public realm and landscaping proposals have has been designed to be inclusive to all. In particular information is missing in the design and access statement in relation to the level changes across the site. Such information will be needed before stage two to ensure the scheme is fully compliant with London Plan policy 7.2.

Climate change mitigation

48  The applicant has followed the energy hierarchy and is proposing to reduce regulated carbon emissions by 52%, thus exceeding the London Plan requirement. In total, 29% savings will be achieved from energy efficiency measures; this figure appears high and should be evidence via modelling. 12% carbon savings will be generated from utilisation of combined heat and power plant, which will provide the lead source of heat for the site wide energy network. The applicant will also use renewable energy (3,929 sq.m. photovoltaic panels) to reduce emissions by 23%.

49  The applicant has identified that the planned Upper Lea Valley District heating network (ULVDHN) is within the vicinity of the development and that the heat main is planned to pass through the site. To ensure that the heat mains can be accommodated, the applicant has provided a commitment to ensuring that the site is designed to allow future connection to the ULVDH network should this prove viable. Whilst this is welcomed, the applicant should first prioritise connection to the Upper Lea Valley District heating scheme. Evidence of correspondence with those responsible for initiating the network should be provided and submitted as part of the energy strategy. Details should include timescales for when network will be operational and route of the network. The applicant should also provide an estimate of carbon dioxide reduction as a result of connecting directly the ULVDH network.

50  A drawing showing the route of the proposed ULVDH network and the proposed site heat network infrastructure should be provided. This drawing should also identify location of all individual blocks on the development.

51  The site will be served from three energy centres and to comply with London Plan policy, the applicant is requested to investigate a site wide heat network with all apartments and other non-building uses connected to the network. It is accepted that the terrace houses will not need to be connected to the network due to higher distribution losses. The applicant should however connect all other uses served by a single energy centre serving the whole site. The applicant should confirm the size and location of the energy centre.

52  With regards to the Combined, Heat and Power (CHP), the applicant will need to confirm the electrical capacity of the CHP proposed.
Transport

53 A total of 133 car parking spaces are proposed with this development, of which, 129 will be located within the site itself, a net increase of 4 spaces over the existing quantum. The remaining 4 spaces will comprise 3 short-stay/loading spaces for the commercial uses and 1 car club space on Blackhorse Lane. The parking ratio for the residential element of the proposals is 0.27 spaces per unit, which is in accordance with the London Plan policy 6.13.

54 11 blue badge spaces are included within the site provision, 10 of which are for the residential and 1 for the student accommodation element. Whilst TfL welcomes the provision of accessible parking, 54 of the proposed residential units will be designed to wheelchair accessible standards. The applicant should accordingly ensure that each wheelchair accessible dwelling has a parking space designed in line with the London Plan Housing SPG.

55 The application is proposing to deliver 20% active and 20% passive electric vehicle charging points (EVCPs), which is in accordance with the London Plan policy 6.13.

56 The applicant proposes 787 cycle parking spaces which is accepted and in line with London Plan policy 6.9.

57 There are still outstanding issues raised regarding the modal split methodology adopted in relation to the student and office elements and the impact on local bus services for which a predicted directional split assessment should be submitted. Based on the impact assessment as submitted, and given the status of the existing network, TfL expects that the proposals will cause capacity issues on route 123 in both directions and on route 158 at Walthamstow travelling eastbound. In such circumstances, a contribution to mitigate the impact of additional bus demand is therefore sought at a total cost of £450,000 (£90,000 per year over 5 years) per route for the scheme to fully comply with London Plan policy 6.3. Further discussion is required in this regard.

58 Given the nature and scale of the proposed development it is expected that the additional vehicular trips generated will be accommodated on the highway network. Notwithstanding this, the Blackhorse Area Action Plan (AAP) proposes to amend the highway layout at the Blackhorse Lane / Forest Road junction, including the narrowing of the carriageway and amendment to pedestrian crossings. TfL welcomes the principle that this development should contribute towards improved pedestrian links and supports Waltham Forest Council in securing pooling contributions towards this specific highway scheme, which is estimated to cost £1 million in the Blackhorse Lane AAP.

59 In addition to this, TfL welcomes the proposed scope of the works for the section 278 agreement, which includes the proposed bus stop upgrades.

60 The proposed provision of a linear park within the site that links to the proposed bridge (funded by Outer London Fund) connecting the site to the Walthamstow Wetlands is supported.

61 Before the scheme is referred back at stage two, further discussion is needed regarding the applicant contributions towards Legible London signs to enhance the way finding capability for pedestrians in this area.

62 The applicant will need to submit a Delivery and Servicing Plan (DSP), a Construction Logistics Plan (CLP) which will need to be secured appropriately by the Council. In addition, two separate travel plans will be required to manage the range of travel demand with the different land use proposals. A full residential travel plan and a framework workplace travel plan must be secured via a planning obligation, in accordance with the London Plan policy 6.3. For the student
accommodation, TfL requires a management plan to be submitted in order to manage student arrivals and departures at transition times during the year.

Community Infrastructure Levy

63 The Mayor has introduced a London-wide Community Infrastructure Levy (CIL) to help implement the London Plan, particularly policies 6.5 and 8.3. The Mayoral CIL formally came into effect on 1 April 2012, and it will be paid on commencement of most new development in Greater London that was granted planning permission on or after that date. The Mayor's CIL will contribute towards the funding of Crossrail.

64 The Mayor has arranged boroughs into three charging bands. The rate for Waltham Forest Council is £20 sq.m. The required CIL should be confirmed by the applicant and council once the components of the development or phase thereof have themselves been finalised. See the 2010 regulations: http://www.legislation.gov.uk/ukdsi/2010/9780111492390/contents as amended by the 2011 regulations: http://www.legislation.gov.uk/uksi/2011/987/made

65 London borough councils are also able to introduce CIL charges which are payable in addition to the Mayor’s CIL. Waltham Forest has yet to adopt a scheme.

Local planning authority’s position

66 At this stage the Council’s formal position is unknown.

Legal considerations

67 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.

Financial considerations

68 There are no financial considerations at this stage.

Conclusion

69 London Plan policies on principle of development, housing (affordable housing, housing choice, residential quality and density), children’s play space, urban design, inclusive access, climate change mitigation and transport are relevant to this application. The application complies with some of these policies but not yet with others and on balance does not yet comply with the London Plan. The reasons and the potential remedies to issues of non-compliance are set out below:

- **Principle of development**: The principle to redevelop the site for a residential led mixed development is supported in London Plan policy terms; however further information is required in relation to any displaced businesses.
• **Housing:** The application would make a 12% contribution to affordable housing provision; an independent assessment of the applicants viability assessment will need to be carried out and further clarification is sought with respect to the tenure mix before the proposals can be found compliant with London Plan polices 3.11 and 3.12. The residential quality and residential density is acceptable and the scheme is in line with London Plan policies 3.5 and 3.4 respectively.

• **Children’s playspace:** The applicant will need to provide clarification of child yield calculations and their play space strategy to ensure accordance with London Plan policies 3.6.

• **Urban design:** The applicant is requested to reconsider the uses on the ground floor of the northern edge of the site; provide front entrances for ground floor units and clarify the layout of the southern edge of the student accommodation before the scheme is deemed to be acceptable and in line with London Plan policies, particularly 7.1 and 7.7.

• **Inclusive access:** In order for the scheme to comply to London Plan policies 3.8 and 7.2, the applicant is requested to provide further information relating to inclusive design. In doing so, the applicant will need to clarify that the 10% of wheelchair accessible units and ensure is provided across unit types and tenures, clarity inclusive access provision of the student accommodation and provide a clear explanation as to how the public realm and open spaces meet inclusive access requirements in order to meet London Plan Policy 7.2.

• **Sustainable development:** For clarity the applicant should provide further detail in relation to future proofing of the delivery of the district heat network, is requested to investigate a site wide heat network with all apartments and other non-building uses connected to the network and the applicant will also need to confirm the electrical capacity of the CHP proposed.

• **Transport:** The scheme in generally acceptable; however further information is required from the applicant and a number of contributions secured, before TfL can confirm if the development is in accord with transport aspects of the London Plan.

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