

5 March 2014

**100 Whitechapel Road
Land and Building Fronting Fieldgate Street & Vine
Court, London, E1 1JG**

in the London Borough of Tower Hamlets

planning application no. PA/13/03049

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 vehicle workshop and erection of extension to the prayer hall at the East London Mosque, residential development comprising **241 open market and affordable housing units** including studio, one, two, three and four bedroom apartments in buildings **up to 18 storeys**, basement parking, public realm improvements, pedestrian link from Fieldgate Street to Whitechapel Road.

The applicant

The applicant is **Alyjiso and Fieldgate Ltd.** and the architect is **Webb Gray.**

Strategic issues

The development of this **mixed-use** scheme accommodates both **the extension of the East London Mosque** and **residential uses** on a constrained site within the City Fringe Opportunity Area. The proposal is broadly in accordance with strategic planning policy, and is supported. However, further discussion is required regarding **housing quality, children's play space** provision, **inclusive design, sustainability** and **transport.**

Recommendation

That Tower Hamlets Council be advised that while the application is generally acceptable in strategic planning terms the application does not comply with the London Plan, for the reasons set out in paragraph 86 of this report; but that the possible remedies set out in this paragraph could address these deficiencies.

Context

1 On the 20 January 2014 the Mayor of London received documents from Tower Hamlets 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 the 25 March 2014 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.

2 The application is referable under Category 1A of the Schedule to the Order 2008: *"Development which comprises or includes the provision of more than 150 houses, flats or houses and flats."*

3 Once Tower Hamlets 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.

Site description

4 The site comprises an area of 0.8 hectares and lies between Whitechapel Road to the north and Fieldgate Street to the South. It is separated into two distinct zones. The first fronts onto Whitechapel Road and is bound by the 9 storey Brunning House (a 1960s block in use as a hotel) to the west and a run of four storey buildings of varying architectural styles to the east. The second fronts onto Fieldgate Street and is bound by the 8 storey Tower House to the east and the rear of the East London Mosque to the west, including the 7 storey Maryam Centre. The site is currently occupied by a Citroen garage with associated vehicle workshop fronting onto Fieldgate Street at the rear.

5 The Citroen garage sits directly beneath Brunning House, acting as a plinth-like structure with wings either side of the tower. A recent planning application has been approved by the Council that proposes a mixed use development comprising an extension to the existing hotel and extension/alternative commercial uses for part of the garage. To the east of the north section of the site is Vine Court, a narrow service route to the rear of properties fronting onto Whitechapel Road.

6 Part of Fieldgate Street which adjoins the site is within the locally designated Myrdle Street Conservation Area. The wider area is predominantly mixed-use and is included within the City Fringe Opportunity Area.

7 The site is located adjacent to the A11 Whitechapel Road, part of the Transport for London Road Network (TLRN), to the north and Fieldgate Street to the south. The nearest part of the Strategic Road Network (SRN) is Aldgate High Street located 700m to the west of the site. The site is well served by buses with a total of seven services available within 400m of the site. The nearest bus stops are located at adjacent to the site on Whitechapel Road and are served by the 254, 25 and the 205 bus routes.

8 There are four London Underground lines accessible within 600m walking distance of the site (District, Hammersmith & City, Metropolitan and Circle). The nearest station is Aldgate East (Hammersmith & City and District), located 570m away to the west. In addition, London Overground services are available from Whitechapel station located 600m away to the east, which will also be served by Crossrail from 2018.

9 The site has therefore been estimated to have an excellent public transport accessibility level (PTAL) of 6b, on a scale of 1-6 where 6 is most accessible. This location is also served by the Cycle Hire Scheme. A total of 4 docking stations are located within 300m of the site with the nearest being Altab Ali Park, located on Whitechapel Road, 200m west from this site.

Details of the proposal

10 The proposal involves the demolition of the existing vehicle workshop and the erection of a 300 sq. metre extension to the prayer hall at the rear of the East London Mosque. This will adjoin the rear of the recently consented hotel extension and the rear of the proposed Block 1, an 18 storey building fronting onto Fieldgate Street. A second residential building, Block 2, consisting of 9 to 12 storeys is proposed to the east of Brunning House, the 9 storey element fronting onto Whitechapel Road. A total of 241 units will be provided. This building incorporates a double storey undercroft, providing pedestrian and vehicular access through to Vine Street which connects with a new north-south pedestrian route linking Fieldgate Street and Whitechapel Road. This route is defined by the positioning of the proposed blocks either side with active frontages along its length including three commercial units comprising a total of 330 sq. metres suitable for restaurant, cafe and retail use at the northern end with residential access towards Fieldgate Street. Basement level car parking is provided, incorporating 22 spaces located below Block 1 and extending under the new prayer hall and hotel as far as Block 2.

Case History

11 A pre-application meeting was held on 16 April 2013 with a follow-up meeting held on 16 May 2013. The case officer's advice note following the initial meeting concluded that the principle of a residential led mixed use development on this site is acceptable and in line with London Plan Policy 2.13 which encourages development within opportunity areas to maximise residential and non-residential output and densities while also containing a mix of uses. It was also considered that further design development was required to create a well-defined north-south pedestrian link through the site. This has now been implemented in the current proposal.

12 The follow-up pre-application advice report concluded that the design had improved in response to GLA officer's comments from the previous meeting. Further revisions were requested with regards to the residential mix and quantum of affordable family units as well as the need to provide more active frontages along the north-south link. The applicant was further advised that the quality of architecture should be of an excellent standard in order to support the inclusion of a tall building and high residential density across the site.

Strategic planning issues and relevant policies and guidance

13 The relevant issues and corresponding policies are as follows:

- Principle of development *London Plan*
- Housing *London Plan; Housing SPG; Housing Strategy; draft Revised Housing Strategy; Shaping Neighbourhoods: Play and Informal Recreation SPG; Shaping Neighbourhoods: Character and Context, draft SPG*
- Affordable housing *London Plan; Housing SPG; Housing Strategy; draft Revised Housing Strategy*
- Density *London Plan; Housing SPG*
- Urban design *London Plan; Shaping Neighbourhoods: Character and Context, draft SPG; Housing SPG; London Housing Design Guide; Shaping Neighbourhoods: Play and Informal Recreation SPG*
- Mix of uses *London Plan*
- Transport *London Plan; the Mayor's Transport Strategy; Land for Industry and Transport SPG*
- Parking *London Plan; the Mayor's Transport Strategy*

- Access *London Plan; Accessible London: achieving an inclusive environment SPG; Planning and Access for Disabled People: a good practice guide (ODPM)*
- Tall buildings/views *London Plan, London View Management Framework SPG*
- Sustainable development *London Plan; Sustainable Design and Construction SPG; Mayor's Climate Change Adaptation Strategy; Mayor's Climate Change Mitigation and Energy Strategy; Mayor's Water Strategy*

14 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 Core Strategy 2010, the saved policies of the Tower Hamlets Unitary Development Plan 1998 and the 2011 London Plan (with 2013 alterations).

15 The following are also relevant material considerations:

- The National Planning Policy Framework and Technical Guide to the National Planning Policy Framework;
- The Tower Hamlets Managing Development Development Plan Document (submission version) which has been through EiP and for which the Inspector's report has been received;
- The draft Further Alteration to the London Plan (2014).

Principle of development

16 As set out in paragraph 9, the site is located within the City Fringe Opportunity Area as identified on London Plan Map 2.4 and London Plan Annex One. London Plan policy 2.13 seeks development in opportunity areas to maximise both residential and non-residential output and densities while containing a mix of uses. In particular, development proposals are expected to integrate with the surrounding area to support wider regeneration. Improvements to environmental quality should also be delivered in the opportunity areas. Annex One states that new developments in the City Fringe Opportunity Area have the scope to deliver an indicative capacity of 70,000 new jobs and a minimum of 7,000 new homes over the plan period to 2031.

17 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 Tower Hamlet's is 2,885 additional homes per year between 2011 and 2021. Policy 3.4 of the London Plan seeks to ensure that development proposals achieve the optimum intensity of use taking into account local context, the design principles of the London Plan and public transport capacity. The principle to include residential use as part of the development proposals is acceptable in this context.

18 The proposal includes the provision of commercial space (restaurant and retail) although it is likely to result in a total loss of employment floorspace given the loss of the Citroen garage and workshop. The loss of employment floorspace does not cause concern at a strategic level, however this may be an issue at local level. The applicant should therefore confirm the total net loss of employment floorspace within the application.

19 The London Plan classifies places of worship as social infrastructure and policy 3.16 states that London requires additional and enhanced social infrastructure provision to meet the needs of its growing and diverse population. The policy also confirms that development proposals which

provide high quality social infrastructure will be supported in light of local and strategic needs assessments; that facilities should be accessible to all sections of the community (including disabled and older people); and be located within easy reach by walking, cycling and public transport. Finally it goes on to say that wherever possible, the multiple uses of premises should be encouraged. Therefore, the provision of an extension to an existing mosque is supported strategically.

20 On the above basis, the principle of a residential led, mixed use development is acceptable in strategic terms.

Housing

21 As described above, the principle of residential development on this site is supported strategically.

Affordable housing

22 London Plan Policy 3.12 requires borough councils to seek the maximum reasonable amount of affordable housing when negotiating on individual private residential and mixed-use schemes. In doing so, each council should have regard to its own overall target for the amount of affordable housing provision. In this case, Tower Hamlet's Core Strategy requires a minimum of 35% affordable housing provision. The proposal includes an affordable housing contribution of 29% in terms of habitable rooms, with a split of 23% shared ownership and 77% social rented. The affordable contribution in terms of the number of units would equate to 26%. It is noted that the Council's Management Development DPD Policy DM3 states that it is acceptable to calculate the proportion of affordable housing provision based on habitable rooms. While the proposed affordable split provides a large proportion of social rented units, GLA officers request further clarification for the reasoning behind this, in terms of why the intermediate provision is relatively low. London Plan Policy 3.11 which seeks an affordable split 60% social rent and 40% intermediate provision in order to meet the requirements of a range of housing needs.

23 On balance, it is considered that while the overall provision of affordable housing falls below the Council's target, the proposed affordable contribution is favourable in relation to similar residential schemes in the surrounding area. It is acknowledged that the applicant has submitted a viability assessment with the application and it is advised that the results from this should be independently verified in order to ensure that the maximum level of affordable housing and affordable housing split is achieved. London Plan paragraph 3.75 highlights the potential need for re-appraising the viability of schemes prior to implementation.

Housing choice

24 London Plan Policy 3.8 together with the Mayor's Housing SPG and the draft Revised Housing Strategy, seek to promote housing choice and a balanced mix of unit sizes in new developments, with particular focus on affordable family homes. A summary of the schedule is set out below:

House Type/Size	Market Sale	Affordable Housing	
		Social Rented	Shared Ownership
Studios	68	0	0
1 bed unit	85	12	7
2 bed unit	18	12	7
3 bed unit	20	0	0
4 bed unit	0	12	0
Total units	191	36	14

Table 1: mix of units by tenure

24 The London Housing Strategy sets out strategic housing requirements and Policy 1.1C of the Strategy includes a target of 42% of social rented homes to have three or more bedrooms. In this case, 33% of the social rented units are 4 bedroom units. It is acknowledged that following on from extensive pre-application discussions with Council and GLA officers, the current proposal puts forward an acceptable mix of unit sizes and tenures. It is further noted that the applicant has purposefully included larger affordable 4 bed family units. This is welcomed and while the provision of family sized units falls below the 42% requirement, it is considered that the site constraints of the scheme would make it difficult to provide additional family sized affordable units without impacting on the overall design quality of the scheme.

25 London Plan Policy 3.11 accords priority to a good amount of family housing to form part of residential proposals. The proposal currently has a relatively high proportion of studio and one bed flats (63% overall) compared with an overall provision of family sized units of 13%. Notwithstanding the above comments, the GLA would encourage further consideration given to increasing the number of family sized units across the scheme.

Density

26 London Plan Policy 3.4 requires development to optimise housing output for different locations taking into account local context and character, design principles set out in London Plan Chapter 7 and the public transport capacity; Table 3.2 provides density guidelines in support of this. The site has a public transport accessibility level (PTAL) of 6b with characteristics of a central setting. This gives a density range of 650-1100 habitable rooms per hectare.

27 The proposed residential density is broadly in line with the density matrix of Table 3.2, at approximately 632 habitable rooms per hectare, based on a simple calculation of the number of habitable rooms in relation to the total site area. It is noted that this is a mixed use scheme and there is total of 632 sq. m. of non-residential floorspace, including the rear extension to the East London Mosque. Taking this into account, the density would increase using the net residential site area method of calculating residential density as part of a mixed-use scheme. However, the proposed density would remain within the above guidelines and is therefore supported in strategic terms.

25 It is noted that the application site lies within the City Fringe Activity Area which permits the principle of tall buildings, stepping down in scale from Aldgate and Canary Wharf Preferred Office Locations. It is further acknowledged that the Council has permitted a number of schemes within the site vicinity of a comparable height to the proposed 18 storey tower, as listed in the application's Planning Statement. However, only one of the schemes listed is a residential tower (61-75 Alie Street) and this proposal is located approximately 500 metres to the west of the application site and close to the cluster of tall buildings around Aldgate.

26 The application site is spatially constrained with the proposed 18 storey block fronting onto

the relatively tight knit network of streets to the south of the site. While the scheme's residential density can be supported at a strategic level, this is subject to overall design quality in terms of architecture, residential quality and accessibility in order to fully justify the scheme's density. These issues will be addressed in more detail in the relevant sections of this report.

Children's play space

27 Policy 3.6 of the London Plan sets out that all development proposals that include housing should make provision for play and recreation space based on the expected child population and an assessment of future needs. The Mayor's supplementary planning guidance '*Shaping Neighbourhoods: Play and Informal Recreation SPG*' (September 2012) provides that development proposals should ensure that sufficient on-site play space provision is made for under-5 year olds. For older children, it describes how where developments are restricted by site constraints, they may be able to utilise existing off-site provision that has excess capacity or is capable of enhancement from the proposed development. In these instances, the benchmark standard of 10 sq.m. per child need not be applied.

28 In this instance, the anticipated child yield of the development is 64 children, of which 21 would be under 5, 24 between 5 and 11 years old and 20 would be 12 years or over. In accordance with the SPG guidelines and the Council's policies on children's play space provision, the applicant should indicate how the proposal will provide 640 sq. m. of usable play space which should include a range of spaces for each age group. It is noted that provision has been made for 'doorstep' play space, provided internally for under-5 year old children. Further details on the nature and location of these spaces are however required in order to fully assess their suitability. As described within the pre-application advice, the design and access statement should demonstrate how a play space strategy will be integrated into the proposal, including an assessment of existing play facilities within the surrounding area that may be utilised to meet the play space quantum requirements. It is noted there are two open spaces within 500 metres of the site; Altab Ali Park to the west and Vallance Gardens to the northeast of the site.

29 It is essential that adequate facilities are provided as part of the development proposal, based on the expected child population and that a detailed play strategy is submitted prior to the proposal being referred back to the Mayor at Stage 2. In addition, an audit of facilities and capacity of nearby play spaces should be provided. It may also be necessary for the applicant to make a financial contribution towards the upgrade of local open space facilities and secured through a Section 106 agreement.

Urban Design

30 Good design is central to all objectives of the London Plan and is specifically promoted by the policies contained within Chapter Seven, which addresses both general and specific design issues. London Plan Policy 7.1 sets out a series of overarching design principles for development in London. Other design policies in this chapter include specific design requirements relating to maximising the potential of development sites in order to provide high quality new housing that will make a positive contribution to the site's surrounding context and character (Policy 7.4).

31 The intention to provide a north-south pedestrian link through the site, linking Fieldgate Street with Whitechapel Road is strongly supported. The link aligns with Settles Street to the south of Fieldgate Street, providing a well-defined spatial relationship with the surrounding street layout. However, while the provision of the new link will improve permeability to Whitechapel Road from the south, the inclusion of this pedestrian route should not be detrimental to the quality of ground floor external space directly related to the development proposal.

32 The north end of the link is successfully configured with good active frontages provided by

the proposed restaurant space of Block 2 and the commercial units of the adjacent application (PA/13/01168). The link's south end is less successful with internal entrances to the ground floor units of Block 1 resulting in minimal active frontage and an ambiguous delineation of ground floor private amenity space and public realm. The applicant is therefore strongly advised to consider relocating studio and one-bedroom units from this location and replacing them with larger family sized duplex apartments. This would enable front doors and living spaces to be positioned directly onto the pedestrian link, introducing passive surveillance, active frontages and an improved spatial relationship with the public realm at the southern end of the route.

33 Further detail is also required on the ground treatment of where the pedestrian link meets Vine Court and how access to the latter is controlled, given that servicing and emergency vehicular access is proposed from the south end of the pedestrian link and along Vine Court. There are currently three residential entrances shown beneath the undercroft of Block 2 and at the west end of Vine Court. It is not clear from the information provided whether public access from the pedestrian link to Vine Court is to be controlled. The applicant is therefore strongly advised to provide a full public realm and landscape strategy before the scheme is referred back to the Mayor at Stage 2.

Tall buildings

34 London Plan Policy 7.7, relating to the specific design issues associated with tall and large-scale buildings, is of particular relevance to the proposed scheme. This policy sets out specific additional design requirements for tall buildings, which are defined as buildings that are significantly taller than their surroundings and/or have a significant impact on the skyline. Policy 7.7 also makes reference to the importance of providing a good degree of ground floor activities that provide a positive relationship to surrounding streets while incorporating the highest standards of architecture and materials.

35 As part of the pre-application advice, the applicant was requested to demonstrate whether the proposed 18 and 15 storey towers would be likely to have an impact on viewing corridors as defined in the London View Management Framework (LVMF) SPG, or whether the proposed development is likely to appear within any of the designated vistas. It is acknowledged that the Planning Statement now confirms that the application site lies outside the line of any of the designated viewing corridors.

36 Notwithstanding the above comments, the height of the proposed residential blocks can be supported from a strategic perspective given that the site is located within the City Fringe Opportunity Area where taller buildings are acceptable. This is however subject to the applicant clearly demonstrating a high quality of ground floor public and private spaces, accessibility and an exemplary standard of architecture.

37 Further information is required in order to demonstrate how the scheme will deliver a well-defined and legible ground floor spatial strategy, as described in paragraph 32 above. In addition, the applicant is requested to supply further visual information that clearly demonstrates how the architecture of the residential blocks will contribute positively to the surrounding context and character of the site.

38 The submitted Views Assessment provides an indication of the likely visual impact of the residential blocks on the character of the surrounding townscape, but it is considered that for a residential scheme of this size and its location close to a conservation area, the applicant is encouraged to provide a more detailed assessment. This should include a clearer indication of how the proposed architecture and form of the buildings will respond positively to their surroundings. Particular attention should be given to exploring the visual impact of the 18 storey block in relation to the existing townscape to the south of the site, which is predominantly low-rise in scale and of a

residential nature. Similarly, key views of Block 2 should be provided that illustrate how this building will positively contribute to the established and emerging streetscape of Whitechapel Road.

Residential quality

39 London Plan Policy 3.5 promotes quality in new housing provision and sets out minimum space standards within Table 3.3. The applicant stated at the pre-application stage that all units are to be designed to exceed these standards, however there is insufficient information within the application to demonstrate this. Further information is therefore required that provides a clear indication of the spatial quality of each housing tenure within the development, with further reference given to meeting Lifetime Homes guidelines. This will be addressed in more detail in the Inclusive Access section of this report.

40 The Mayor's Housing SPG provides the implementation tool for London Plan Policy 3.5 for all housing tenures, also drawing on the Mayor's London Housing Design Guide (LHDG), which sets out objectives to ensure the design and layout of residential developments are of the highest possible spatial quality. In relation to the proposed scheme and given the spatial constraints of the site, the basic layout of the two residential blocks is supported, with good core to unit ratios and private amenity space provision. Concerns raised by GLA officers at the pre-application stage on the number of single aspect units and in particular, those which are north facing, have not been fully addressed and there remain a number of single aspect studio flats fronting onto Whitechapel Road. While it is accepted that there are restrictions in terms of what can be achieved due to spatial constraints, it is considered that further attention should be given to minimising north facing single aspect units, especially as their residential quality will be further affected by the noise levels of Whitechapel Road.

41 The majority of single aspect units elsewhere in the scheme are one or two bedroom units. It is therefore important that floor to ceiling heights achieve a minimum of 2600mm and that the depth of these units is optimised to maximise daylight penetration.

42 The submitted internal daylight and sunlight studies of the proposed Block 2 reveal that there are 127 habitable rooms out of a total of 209 (61%) which meet the BRE Average Daylight Factor guidelines. The block's south façade contains 49 windows out of a total of 210 (23%) that will achieve BRE guidelines in relation to Average Probable Sunlight hours. Block 1, fronting onto Fieldgate Street and with a better exposed south facing aspect, achieves 63% of habitable rooms meeting the ADF criteria, with 87% of south facing windows meeting BRE sunlight guidelines at the lowest 14 floors.

43 The above findings present an indication of the constraints arising from the position of the 8 storey Tower House, 15 storey Brunning House and 7 storey Maryam Centre impacting on the ability to provide daylight to the lower levels of the proposed development's west and south facing elevations. There is also an element of overshadowing caused by the positioning of the proposed residential blocks in relation to each other. The collective building massing also impacts on the quality of light within the defined spaces along the new pedestrian link. In response to these constraints, further consideration should be given to ensuring that the orientation of habitable rooms is optimised.

Scale, massing and appearance

44 The proposed concrete frame construction is supported as this will provide a modular appearance, allowing individual residential units to be clearly articulated. The applicant is encouraged to implement a simple approach to the materiality and architectural detailing of the residential facades with the aim of forming a high quality and rational design response that sits well with the surrounding context.

45 The Council is encouraged to implement relevant planning conditions to ensure a high quality of detailing throughout the scheme and in particular to the ground level treatment of commercial and residential entrances and in relation to the materiality and detailing of the landscaping strategy, as described in paragraph 34.

Inclusive Design

46 The aim of London Plan Policy 7.2 is to ensure that proposals achieve the highest standards of accessibility and inclusion (not just the minimum). Inclusive design principles if embedded into the development and design process from the outset help to ensure that all of us, including older people, disabled and Deaf people, children and young people, can use the places and spaces proposed comfortably, safely and with dignity. The nature of the proposal reflects the need to provide a highly accessible and inclusive scheme, however there are areas that would benefit from further clarification.

47 The expectation is that any proposal referred to the Mayor will aim for the highest standards (not just the minimum) and the accompanying design and access statement should illustrate how the proposal meets these requirements and justifies the decisions taken, especially any deviation from accepted good practice. There is a questionnaire on the web site which the applicant should be asked to address:
http://www.london.gov.uk/sites/default/files/Access%20statement%20content%20guidance_0.pdf

48 The design and access statement should explain the design thinking behind the application and demonstrate how the principles of inclusive design, including the specific access needs of disabled people, have been integrated into the proposed development and how inclusion will be maintained and managed.

Public realm/ landscaping

49 The design of the landscaping and the public realm is crucial to how inclusive the development is for many people. The proposals should ensure that the routes from the public transport facilities to the new entrance points are legible and clearly identifiable, and that way finding is easy to make access easy, safe and comfortable. The design and access statement should show how disabled people access each of the entrances safely, including details of levels, gradients, widths and surface materials of the paths and how any level changes on the routes will be addressed.

Shared Surfaces

50 ‘Shared surfaces’ are proposed within the public realm. Paragraph 6.37 of the London Plan emphasises the importance of providing “safe and attractive routes that are easy to navigate”, and paragraph 6.38 explains that “Walking issues should be addressed in development proposals, to ensure that walking is promoted and that street conditions, especially safety, security and accessibility for disabled people, are enhanced.” If shared surfaces are proposed, the applicant

should illustrate what design features will be incorporated to ensure that the areas are safe and usable for disabled people. Further information is therefore required on this element of the proposals.

Residential units

51 The applicant should confirm that all residential units will be designed to the Lifetime Homes Standard and that 10% are to be wheelchair accessible or easily adaptable homes in line with London Plan Policy 3.8 Housing Choice.

52 The layouts of units contained with the design and access statement December 2013 rev. A do not appear to meet Lifetime Homes Criteria and as such the applicant should demonstrate in the design and access statement that the design of the residential units meet the 16 Lifetime Home standards (see the Quality and Design Standards in the Mayor's Supplementary Planning Guidance 'Housing'), and that the wheelchair accessible homes meet the standards set out in Annex 2 Best Practice Guidance for Wheelchair Accessible Housing, of the GLA's Supplementary Planning Guidance 'Housing' (see <http://www.london.gov.uk/sites/default/files/Housing-SPG-highres.pdf>.) as requested in the pre-application report.

53 Typical flat layouts and plans of the wheelchair accessible homes and the Lifetime Homes should be included in the design and access statement to illustrate the relevant features. It should be clear on the plans where the wheelchair accessible homes are located and how many there are. These should be distributed across tenure types and sizes to give disabled and older people similar choices to non-disabled people.

54 The design and access statement refers to powered doors but the plans only indicate revolving doors. The use of revolving doors to the entrances is a concern, and in terms of inclusive design, an alternative solution should be identified.

Sustainable development

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

56 A range of passive design features and demand reduction measures are proposed to reduce the carbon emissions of the proposed development. Both air permeability and heat loss parameters will be improved beyond the minimum backstop values required by building regulations. Other features include mechanical ventilation with heat recovery and attention to detail to reduce thermal bridging. The applicant should provide further detail on how the demand for cooling will be minimised in line with policy 5.9.

57 The development is estimated to achieve a reduction of 52 tonnes per annum (19%) in regulated CO₂ emissions compared to a 2010 Building Regulations compliant development. The applicant should provide sample DER/TER worksheets showing the impact of energy efficiency savings alone (i.e. excluding CHP or PV) to demonstrate that Part L 2010 will be met by efficiency measures alone and to support the savings claimed.

District heating

58 The applicant has carried out an investigation and claims that there are no existing or planned district heating networks within the vicinity of the proposed development. The London Heat Map shows a proposed Tower Hamlets district heating line reaching the Royal London

Hospital, approximately 400m to the east of the development site. Connection to existing or proposed networks should be prioritised and the applicant should demonstrate that opportunity for connection has been properly investigated. Evidence of correspondence with Tower Hamlets energy officers, or other relevant parties involved in developing the network (e.g. the Royal London Hospital facilities manager) should be provided including details of likely timescales and technical considerations for connection.

59 The applicant has provided a commitment to ensuring that the development is designed to allow future connection to a district heating network should one become available. The applicant is proposing to install a site heat network. However, the applicant should confirm that all apartments and non-domestic building uses will be connected to the site heat network. The applicant is proposing a VRF system for the retail units at ground level. The applicant should ensure that the design of the retail units is suitable for connection to district heating now or in the future.

60 The site heat network will be supplied from a single energy centre located at ground level. A plan showing the proposed location and floor area of the energy centre should be provided.

Combined Heat and Power

61 The applicant is proposing to install 4 x 5.5 kW_e 15.5kW_{th} gas fired CHP units as the lead heat source for the site heat network. The CHP is sized to provide the domestic hot water load. The applicant should provide further information on the sizing of the CHP, including monthly heat loads for the development and the proposed contribution from the CHP system. Given the small nature of the scheme, the applicant should also provide further details on the electricity sales strategy and management arrangements for the system. A reduction in regulated CO₂ emissions of 45 tonnes per annum (20%) will be achieved through this second part of the energy hierarchy.

Renewable energy technologies

62 The applicant has investigated the feasibility of a range of renewable energy technologies and is proposing to install 227 sq. m. of PV (41kW_p) of solar PV on the roofs of the building. A roof plan showing the proposed location of the PV has been provided and the daylight sunlight assessment suggests that there shouldn't be any significant overshadowing of the panels. A reduction in regulated CO₂ emissions of 19 tonnes per annum (10%) will be achieved through this third element of the energy hierarchy.

Overall carbon savings

63 Based on the energy assessment submitted at stage I, the table below shows the residual CO₂ emissions after each stage of the energy hierarchy and the CO₂ emission reductions at each stage of the energy hierarchy.

Table: CO₂ emission reductions from application of the energy hierarchy

	Total residual regulated CO ₂ emissions (tonnes per annum)	Regulated CO ₂ emissions reductions	
		(tonnes per annum)	(per cent)
Baseline i.e. 2010 Building Regulations	277.8		
Energy Efficiency	225.6	52	19%
CHP	180.5	45	20%
Renewable energy	161.8	19	10%
Total		116	42%

64 A reduction of 116 tonnes of CO₂ per year in regulated emissions compared to a 2010 Building Regulations compliant development is expected, equivalent to an overall saving of 42%. The carbon dioxide savings exceed the targets set within Policy 5.2 of the London Plan however further information should be provided as requested above before the savings can be verified.

Transport

Car parking

65 A total of 24 car parking spaces are proposed for the residential units, this equates to a ratio of 0.1 spaces per unit. This provision includes three Blue Badge bays. In recognition of the site's excellent accessibility to local public transport and central London location, TfL considers that a car free development would be appropriate in this location. The London Plan policies set out the requirement to ensure that on-site car parking at new developments is provided within the minimum necessary and that there is no overprovision that could undermine the use of more sustainable non-car modes, particularly in locations of high public transport accessibility. Furthermore, it is requested that occupiers be made exempt through the Section 106 agreement from applying for a local controlled parking zone (CPZ) permit.

66 Notwithstanding the above, Blue Badge parking will need to be provided. The London Plan Housing SPG recommends that each wheelchair accessible unit is allocated a Blue Badge space. On the basis that 10% of the proposed units meet this criteria a minimum of 24 Blue Badge spaces would be required. It is acknowledged however that this provision would not necessarily be appropriate in this location as the site benefits from excellent access to local bus services. Further discussion is therefore required with the applicant to determine an appropriate provision on this site. Any car parking agreed on site would require Electrical Vehicle Charging Points (EVCPs) in accordance with the London Plan minimum standards.

Cycle parking

67 It is proposed that 360 on-site cycle parking spaces would be provided within the basement however it is not clear how this will be allocated between the land uses proposed on site and this will require clarification before TfL can consider the provision to accord with London Plan policy 6.9 'Cycling'.

Impact assessment

68 A trip rate assessment disseminated by mode was not originally provided as part of the application documents. This has however now been provided by the applicant as a TA addendum and has been reviewed. TfL is able to confirm that this development would not have an unacceptable impact on the local highway, bus and rail network.

69 Notwithstanding the above, it is accepted that occupiers of the site will utilise the local bus services. On this basis and to promote inclusive access for all users of the proposed development, the applicant should undertake an assessment of the pair of bus stops located on Whitechapel Road (stops K and J) and identify a schedule of works required to improve them in line with TfL's 'Accessible Bus Stop Design Guidance': http://www.tfl.gov.uk/assets/downloads/businessandpartners/accessible_bus_stop_design_guidance.pdf and Whitechapel Masterplan. Upon TfL's receipt of the audit, a capped contribution of up to £20,000 per bus stop may be requested to ensure full compliance with accessibility guidelines.

Walking

70 There is currently a cluster of pedestrian collisions at the Plumbers Row/Greatorex Street

where pedestrians are crossing without using controlled crossings. TfL therefore supports the provision of a pedestrian link between Fieldgate Street, Vine Court and Whitechapel Road through the site as this will encourage people to use the new upgraded pedestrian crossing located outside the East London Mosque.

71 TfL are committed to improving the quality of the urban realm within the Whitechapel area in accordance with the Whitechapel Masterplan. The footway adjacent to the development has already been upgraded as part of this programme and the next phase is the upgrading of footways between 100 Fieldgate Street and the New Road/Vallance Road junction. In accordance with London Plan policy 6.10 *'Walking'* and to accommodate an increase of walking trips to and from the site a contribution of £350,000 is requested towards these works.

72 Furthermore, TfL suggests that these proposals should contribute towards the implementation of Legible London signage in the immediate vicinity of the site. Legible London is a wayfinding initiative to encourage walking and cycling and the applicant should note that a pair of signs cost approximately £15,000.

Cycle hire

73 The local cycle hire facilities currently experience very high levels of utilisation and this is expected to further increase following the delivery of improvements along Cycle Superhighway 2. This development will generate an increase in demand for cycle hire and therefore in accordance with London Plan policy 6.9 *'Cycling'* a contribution of £70,000 is requested. This contribution will be pooled from other development in the local area towards the provision of additional cycle hire capacity.

Construction, delivery and servicing

74 A controlled lay-by, drop off zone has been incorporated within the hard landscaping to the Fieldgate Street frontage. The applicant has proposed that this area could be used for deliveries and refuse collection. Before TfL can consider these arrangements acceptable, swept path analysis of the largest expected vehicle is required to demonstrate that all movements can be undertaken safely without detriment to the operation of Fieldgate Street. Furthermore, in accordance with London Plan policy 6.14 *'Freight'* both a draft Delivery and Servicing Plan (DSP) and Construction Logistics Plan (CLP) will need to be provided for the Council's and TfL's review prior to the application's determination.

Travel planning

75 TfL welcomes the submission of a residential Travel Plan, which aims to promote sustainable travel to and from the site. The plan has however failed the ATTrBuTE assessment used by TfL to assess the content and requires further information on how the Travel Plan will be secured to comply with London Plan policy 6.3 *'Assessing effects of development on transport capacity'*. Furthermore, the applicant should clarify whether the existing mosque benefits from an existing travel plan, if not, one should be provided for review prior to the application's determination. For TfL's guidance on travel planning for new developments, please visit: http://www.lscp.org.uk/newwaytoplan/travelplan_guidance.html. The travel plans and all agreed measures therein should be secured, enforced, monitored and reviewed as part of the S106 agreement.

Summary

76 TfL can confirm that there is sufficient bus, rail and London Underground capacity to accommodate this development however, a contribution is required towards local highway

improvements and cycle hire capacity. Furthermore, the proposed quantum of parking will need to be fully justified as a car free development would be more appropriate at this location. Notwithstanding this, appropriate Blue Badge parking needs to be provided and further discussion on this matter is required. Finally, the residential travel plan will need to be revised and a bus stop audit, DSP and CLP should be provided by the applicant for review by TfL.

77 Provided the development is mitigated to TfL's satisfaction following the advice provided, then TfL considers this development could accord with transport policies in the London Plan.

Community Infrastructure Levy

80 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.

81 In accordance with London Plan policy 8.3, *Community Infrastructure Levy*, the Mayor agreed to commence CIL charging for developments permitted on or after 1 April 2012. It is noted that the proposed development is within LB Tower Hamlets, where the Mayoral charge is £35 per square metre Gross Internal Area (GIA). The levy will raise £300 million towards the delivery of Crossrail. Further details can be found at: <http://www.london.gov.uk/publication/mayoral-community-infrastructure-levy>.

82 The mechanism for contributions to be made payable towards Crossrail has been set out in the Mayor's Supplementary Planning Guidance (SPG) *'Use of planning obligations in the funding of Crossrail and the Mayoral Community Infrastructure Levy'* (April 2013) and London Plan policies 6.5 and 8.3. The SPG states that contributions should be sought in respect of uplift in floorspace for B1 office, hotel and retail uses (with an uplift of at least 500sqm). Although the site resides within a charging area, there would only be an uplift of 358sqm of commercial space on site and therefore TfL can confirm that no Crossrail charge is due.

Local Authority's position

83 This is yet to be determined at this stage.

Legal considerations

84 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 of the Order to refuse the application, or issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application and any connected application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

Financial considerations

85 There are no financial considerations at this stage.

Conclusion

86 London Plan policies on housing and affordable housing, child play space, urban design, inclusive design, density, climate change mitigation, climate change adaptation and transport are relevant to this application. The application is generally acceptable in strategic planning terms however, further discussion is needed together with some consequent changes on the issues set out below to ensure conformity with London Plan policies:

- **Principle of development** - London Plan policy 2.13 seeks development in opportunity areas to maximise both residential and non-residential output and densities while containing a mix of uses. The principle of development is therefore supported in strategic terms. Development proposals are expected to integrate with the surrounding area to support wider regeneration; further design information is required to demonstrate that proposed ground level spaces, including the pedestrian link and its relationship with private spaces, are fully developed.
- **Affordable housing** – Further clarification is required on the justification of providing a high proportion of social rented units, with reference to the London Plan’s affordable split of 60% social rented and 40% intermediate. The Council is advised to undertake an independent Viability Assessment in order to ensure the maximum contribution of affordable housing is achieved.
- **Housing mix** - London Plan Policy 3.11 accords priority to a good amount of family housing to form part of residential proposals. The proposal currently has a relatively high proportion of studio and one bed flats (63% overall) compared with an overall provision of family sized units of 13%. GLA officers would therefore encourage further consideration given to increasing the number of family sized units across the scheme.
- **Density** - The proposed residential density can be supported in strategic terms, subject to a high quality of ground floor spaces and a high standard of architectural materials and detailing.
- **Children’s play space** – Further clarification is required on the proposed quantum of play space provision, including a clear indication of how it is to be integrated within the scheme. An audit of nearby open spaces should also be supplied before the scheme is referred back to the Mayor at Stage 2.
- **Urban Design** – The inclusion of the north-south pedestrian link is strongly supported and will enable improved connectivity to Whitechapel Road when approaching from the south of the site. Further information is however required to enable the public realm to be clearly defined from private areas. The applicant is strongly advised to consider introducing front door entrances along the south section of the link to encourage activity and passive surveillance.
- **Residential quality** – Further information is required on floor to ceiling heights of units to ensure that the highest possible residential spatial quality is achieved on this constrained site.
- **Inclusive access** – Further information is required as detailed above in relation to the treatment of proposed shared surfaces along the pedestrian link. Details are also required that clearly demonstrate how the scheme meets Lifetime Home and wheelchair accessibility standards.

- **Sustainable development** – The applicant has broadly followed the energy hierarchy and sufficient information has been provided to understand the proposal as a whole. However, further revisions and information is needed before the proposals can be considered compliant with the relevant policies of the London Plan, as detailed in the Sustainable Development section.
- **Transport** – While TfL acknowledges that there is sufficient bus, rail and London Underground capacity to accommodate the proposed development, a contribution is required towards local highway improvements and cycle hire capacity. In addition, the proposed car parking quantum requires further justification along with the provision of appropriate Blue Badge parking. Finally, the residential travel plan will need to be revised and a bus stop audit, DSP and CLP should be provided for review, before the scheme is referred back to the Mayor at Stage 2.

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