New Covent Garden Market, Nine Elms Lane, SW8
in the London Borough of Wandsworth
planning application no. 2014/2810

<table>
<thead>
<tr>
<th>Strategic planning application stage 1 referral</th>
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<tr>
<th>The proposal</th>
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<tr>
<td>A mixed use redevelopment across five sites (the Main Market, Apex, Thessaly Road, Northern and Entrance sites) comprising the reprovision of wholesale Fruit and Vegetable and Flower Markets, up to 3,019 residential dwellings along with retail, office, community and leisure floorspace; car, cycle and motorcycle parking (underground and in multi-storey structures), landscaping public realm and open space including part of the Linear Park.</td>
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<td>Proposals for the new markets and building N8 (the tallest building on the Northern site) are submitted as full, detailed applications. All other elements of the proposal are submitted in outline, with all matters reserved except for access.</td>
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<table>
<thead>
<tr>
<th>The applicant</th>
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<tbody>
<tr>
<td>The applicant is Vinci St Modwen (New Covent Garden Market) Ltd., and the architects are Skidmore, Owings and Merrill and BDP.</td>
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<table>
<thead>
<tr>
<th>Strategic issues</th>
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<tr>
<td>The principle of the mixed-use redevelopment of these sites to provide temporary and permanent replacement markets along with housing, retail, and office uses is supported. However, there are a number of outstanding strategic planning concerns relating to social infrastructure, children’s playspace, housing, urban design, strategic views, climate change, inclusive design and transport.</td>
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<tr>
<th>Recommendation</th>
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<tr>
<td>That Wandsworth Council be advised that, whilst the principle of the redevelopment of these sites is supported, the application does not comply with the London Plan, for the reasons set out in paragraph 187 of this report. However, the resolution of those issues could lead to the application becoming compliant with the London Plan.</td>
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<tr>
<th>Context</th>
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<td>On 9 June 2014 the Mayor of London received documents from Wandsworth Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses and reinstatement of the wholesale market use. Under the provisions of The Town &amp; Country Planning (Mayor of London) Order 2008 the Mayor has until 18 July 2014 to</td>
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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 the following Categories of the Schedule to the Order 2008:

- **Category 1A**: “Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats”.

- **Category 1B**: “Development (other than development which only comprises the provision of houses, flats, or houses and flats), which comprises or includes the erection of a building or buildings outside Central London and with a total floorspace of more than 15,000 sq.m.”.

- **Category 1C**: “Development which comprises or includes the erection of a building more than thirty metres high and outside the City of London”.

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

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

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

**Site description**

6 The application site is circa 24.5 hectares in total and comprises five parcels of land currently used for and in association with Covent Garden Market Authority’s wholesale fruit and vegetable market, flower market and ancillary operations. They are:

- **Main Market site**: 14.5 hectares south of the elevated railway viaduct, currently occupied by the wholesale fruit and vegetable market with ancillary food preparation, storage and surface parking areas and a multi storey car park. Vehicular access is currently from Wandsworth Road via the Flower Market and through the railway viaduct, and from Nine Elms Lane to the northwest, via the Entrance site and through the railway viaduct.

- **The Northern site**: 4.3 hectares currently occupied by the Flower Market and a vacant petrol filling station. It is bounded to the north by Nine Elms Lane and to the north and east by Wandsworth Road and the 25 storey Market Towers building and site, which has permission for two new towers up to 200m tall, known as One Nine Elms. The site is bounded to the west by the Embassy Gardens and US Embassy sites.

- **The Entrance site**: 1.34 hectare site northwest of the elevated railway viaduct and main vehicular entrance to the Main Market site; it currently provides controlled access to the Main Market site and provides informal surface level parking. There is a residential building containing five flats on the site. It is bounded to the northwest by Nine Elms Lane, to the north east by the Royal Mail Nine Elms development site (Nine Elms Parkside) and land owned by the Metropolitan Police, and to the south west by the Booker cash and carry site and a BMW service centre.
• The Thessaly Road Site: 0.26 hectare site along the western edge of the Main Market site. To the west are social housing blocks rising up to six storeys.

• The Apex Site: 1.8 hectare, triangular shaped site to the northeast of and adjoining the Main Market site, currently occupied by hard standing for parking related to the Market. It is bounded to the southeast by 2-storey residential development, to the east by the Sainsbury’s development site, and to the north by the elevated railway viaduct. Beyond the viaduct to the north is the Embassy Gardens development site.

7 The application site also includes circa 1.8 hectares of highway land.

8 The site is within the Vauxhall Nine Elms Battersea (VNEB) opportunity area, in the Nine Elms area near the south bank of the River Thames and close to Vauxhall. The site is bounded by Battersea to the west, Vauxhall to the east, and Lambeth to the south and west.


10 Nine Elms Lane/Battersea Park Road bounds the site to the north and is part of the Transport for London Road Network (TLRN). Wandsworth Road bounds the site to the east and is maintained by Lambeth Council. Public transport accessibility level (PTAL) is measured on a scale of 1 to 6 where 6 is most accessible. As this site covers a large area the (PTAL) ranges from 6 on the Northern Site, which is within acceptable walking distance (400m) of Vauxhall interchange, to 1-2 on the Entrance Site, and drops as low as 0 on the main market. The site is expected to benefit from the two new stations on the Northern Line Extension (NLE) which will increase the PTAL to between 2 and 6. The proposed Nine Elms Station will be directly southeast of the Apex Site whilst the proposed Battersea Station will be within a 5 minute walk from the Entrance Site.

Details of the proposal

11 Vinci St Modwen (New Covent Garden Market) is seeking outline planning permission for the re-provision of the Fruit and Vegetable and Flower wholesale Market on the Main Market Site, and residential-led mixed use development on the other four sites. Proposals for building N8 on the Northern Site and the whole Market Site have been submitted in detail.

12 The Market proposals incorporate four buildings ranging from 3-5 storeys (residential height) along with 2 multi-storey car parks. The proposals for the other sites incorporate 28 residential-led mixed-use buildings across the four sites, ranging in height from 4-54 storeys, which could accommodate up to 3,019 residential units.

13 The proposals also include 6,120 sq.m. of ground-floor retail space, up to 12,624 sq.m. of office space, up to 1,511 sq.m of community floorspace and 1,678 sq.m of leisure provision, together with basement car and cycle parking, public open space provision, access and servicing.

14 The notable differences to the existing consent are a reduction by 50% of proposed retail floorspace due to the elimination of a supermarket use in the proposals, and reduced amount of market floorspace; these reductions are balanced by an increase of 11,000 sq.m B1 office space, and approximately 500 additional residential units.

15 The table below illustrates the differences in the maximum floorspace proposed between the existing consented scheme and the proposed scheme:
<table>
<thead>
<tr>
<th>Use</th>
<th>Previous Consent</th>
<th>Current proposal</th>
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</thead>
<tbody>
<tr>
<td>Residential (C3)</td>
<td>219,378</td>
<td>309,461</td>
</tr>
<tr>
<td>Wholesale market</td>
<td>93,240</td>
<td>62,211</td>
</tr>
<tr>
<td>Business (B1)</td>
<td>1,403</td>
<td>12,624</td>
</tr>
<tr>
<td>Retail (A1/A2/A3/A4/A5)</td>
<td>13,584</td>
<td>6,120</td>
</tr>
<tr>
<td>Leisure (Gym + Football deck) (D2)</td>
<td>2,403</td>
<td>(1,678 + 4,433)6,111</td>
</tr>
<tr>
<td>Community (D1)</td>
<td></td>
<td>1,511</td>
</tr>
<tr>
<td>Temporary uses (temporary market)</td>
<td>0</td>
<td>14,691</td>
</tr>
<tr>
<td>Hotel (C1)</td>
<td>11,289</td>
<td>0</td>
</tr>
<tr>
<td>Serviced apartments (C1/C3)</td>
<td>5,640</td>
<td>0</td>
</tr>
<tr>
<td>Car parking and basements</td>
<td></td>
<td>77,310</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>346,937</strong></td>
<td><strong>475,348</strong></td>
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*Table 1: Total (maximum) floorspace proposed*

16 Whilst the proposals are submitted as one planning application, they can be broken down by site as follows.

**Market Site**

17 The Market Site proposals have been submitted in detail. The site will accommodate the new wholesale Fruit and Vegetable Market, a new Flower Market with ancillary, market-related uses above, two multi-storey car parks (one of which is already existing), a security lodge and consolidation area. The proposal also moves the entrance gates to the market into the main site to the south of the railway viaduct, rather than keeping them north of the railway viaduct.

18 The Fruit and Vegetable Market will be housed in three trading blocks that are approximately 4-5 residential storeys high and 68m x 270m long, similar in scale to aircraft hangars, and will provide 47,803 sq.m of floorspace for wholesalers, distributors, catering and food service companies. The buildings will be surrounded by a loop road and separated by internal roads and wide hardstanding areas for loading/unloading. Consolidation and vehicle wash areas will be provided in the southwestern corner of the site, whilst the market entrance/exit, security lodge, waste compound, pallets yard, and retained, existing multi storey car park will be in the northwestern part of the site, just south of the railway viaduct; a five-a-side football complex will be created above the waste compound/pallets yard.

19 The Flower Market will be accommodated in a fourth block to the east of the main market, and will provide 6,866 sq.m. of floorspace for the flower market, along with a 3-storey, mixed-use ‘Garden Heart’ building above which will accommodate 7,542 sq.m. of ancillary mixed uses (offices, visitor centre, education, bank, cafe/restaurants, retail) linked to the markets but open to the public. The main frontage will be on the northeast elevation, facing the Apex Site, and will act as a gateway into the market from the residential areas to the east. Directly west of this market will be a new multi-storey car park, which together with the retained car park will provide 771 spaces.

20 The detailed application also incorporates two temporary market facilities to provide decant space for traders and ensure ongoing operation of the markets during redevelopment. The Flower Market will be temporarily relocated to a purpose built facility on the Entrance Site, whilst some of the fruit and vegetable market traders will be temporarily located on the site of the future Flower Market as the first phases of the fruit and vegetable market are constructed.
Northern site
21 The existing Flower Market is proposed to be demolished and the site redeveloped with twelve buildings of 5-54 storeys, comprising a maximum of 1,915 residential units, retail, office (between 3,051-11,423 sq.m.), and community (GP surgery) uses. One of the blocks is proposed as a flexible use, with the potential to accommodate between 3,000-11,000 sq.m. of B1 office space, or residential uses.

22 The heights of the proposed blocks are as follows:

- One 21 metre block (c.5 storeys) and five 37 metre blocks (c.10 storeys);
- Three 19-28 storey towers (N1, N6 and N7) with maximum heights of 69-104 metres;
- Three high towers (N8-N10) with maximum heights of 180 metres (c.54 storeys), 122 metres (c.36 storeys) and 154 metres (c.46 storeys).

23 The blocks will be arranged north and south of two east-west oriented open spaces, comprising the eastern gateway/arrival plaza to the VNEB OA linear park. The three taller towers are located on the southern side of the open spaces and are linked by a large ground floor podium which provide retail and residential entrances. Car parking is proposed in the basement and the interior of the podium, providing 667 spaces along with cycle and motorcycle spaces.

24 Building N8, the tallest of the high towers, has been submitted in detail, and will incorporate retail uses and a residential lobby at podium level, with 346 residential units over 50 floors above.

Apex Site
25 Submitted in outline, seven buildings are proposed ranging in height from 16 metres (c.4 storeys) to 86 metres (c.26 storeys). In addition to approximately 623 residential units, the site will contain up to 3,924 sq.m of retail space, a gym and 1,000 sq.m of office space along with a basement car park for 227 car parking spaces.

Entrance Site
26 Submitted in outline, eight buildings are proposed ranging in height from 27 metres (c.6 storeys) to 62 metres (c.17 storeys). In addition to approximately 430 residential units, the site will contain up to 438 sq.m of retail space, 158 sq.m of office space along with a basement car park for 144 car parking spaces.

Thessaly Road Site
27 Three 6-storey (22 metres) residential buildings are proposed, comprising 51 residential units and 11 car parking spaces.

Case history
28 These sites were granted outline planning permission for comprehensive redevelopment in October 2012, to provide a new market, 2,443 flats, a hotel and serviced apartments, a supermarket, along with miscellaneous retail, office, and leisure uses. Subsequent to the granting of permission the current applicant was appointed as the preferred development partner by the Covent Garden Market Authority (CGMA). In reviewing the extant permission the current applicant and the CGMA identified opportunities to further consolidate the market which would allow the provision of more housing on what is now called the Apex Site; and opportunities to resolve challenges of access, transport, and design issues on the other sites.

29 The applicant has since consulted with the GLA and TfL on several occasions, including a presentation to the Mayor in July 2013. Pre-application discussions addressed issues including height, energy and affordable housing.
The relevant issues and corresponding policies are as follows:

- **Land use principle/mix of uses**  
  London Plan; Housing SPG; Housing Strategy; Shaping Neighbourhoods: Character and Context, draft SPG

- **Housing, Affordable housing**  
  London Plan; Shaping Neighbourhoods: Play and Informal Recreation SPG; Shaping Neighbourhoods: Character and Context, draft SPG

- **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

- **Tall buildings/views**  
  London Plan; London View Management Framework SPG

- **Historic Environment**  
  London Plan; World Heritage Sites SPG; Circular 07/09

- **Access**  
  London Plan; Draft Accessible London: achieving an inclusive environment SPG

- **Sustainable development**  
  London Plan; Sustainable Design and Construction SPG; Mayor’s Climate Change Adaptation Strategy; Mayor’s Climate Change Mitigation and Energy Strategy; Mayor’s Water Strategy

- **Transport**  
  London Plan; the Mayor’s Transport Strategy

- **Crossrail**  
  London Plan; Mayoral Community Infrastructure Levy SPG

- **Parking**  
  London Plan; the Mayor’s Transport Strategy

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 Wandsworth Core Strategy (2010), the Wandsworth Unitary Development Plan ‘saved policies’ (2003) and the London Plan (with 2013 Alterations).


**Land use principle**

The site is located in Central Activity Zone (CAZ) and the Vauxhall–Nine Elms–Battersea (VNEB) opportunity area (OA). London Plan Policy 2.13 (and supporting Table A1.1 of Annex 1) identifies the OA as having scope for significant intensification and increase in housing (a minimum of 20,000 new homes) and commercial capacity, and notes that existing industrial uses should be rationalised whilst sustaining capacity for those which are of particular importance to CAZ and capable of operating more intensively, such as the wholesale market and waste management provision.

The VNEB opportunity area planning framework (OAPF) land use strategy identifies the Entrance site as being in a zone suitable for high density, mixed use housing led development; the Northern Site for high density, mixed use development with a focal point for office, retail and housing; and the Market, Thessaly and Apex sites for consolidation and intensification of Market operations. Wandsworth’s Site Specific Allocations Document notes that the Entrance site is within the Nine Elms Parkside district, the Northern site in the Vauxhall/Embassy district, and the other sites within the Market district of the Nine Elms area, all with land use designations consistent with those in the OAPF.

The redevelopment of the Northern and Entrance sites to contain residential and commercial/employment generating floor space, and the Market site to provide a consolidated
wholesale market accords with the VNEB OAPF land use strategy and Wandsworth’s local plan and is supported in principle. The incorporation of more substantial office space in the Northern site is appropriate as it is part of the Vauxhall/Embassy district which has been identified as one of the locations where the majority of business floorspace should be provided to provide significant high value employment and inward investment.

36 Although the redevelopment of the Thessaly and Apex sites for mixed use including housing and retail alongside the Market redevelopment are a departure from the OAPF and local plan land use designations, their release for residential and mixed use is an opportunity created by the improvement in efficiency of the new market design compared to the previous consent, which has been one of the key drivers of the OAPF. Furthermore, the uses reflect the general mixed-use, CAZ and Opportunity Area policies set out in the London Plan and enable the introduction of greater permeability in the southern sites, as well as a critical mass of residential and mixed uses to sustain local amenities. This scheme will also make a full DIFs/CIL contribution towards public transport and social infrastructure in the VNEB opportunity area.

The Wholesale Market
37 London Plan policy 4.4 sets out that the Mayor will, and Councils should, take into account the need for strategic provision for wholesale markets within London and the wider city region when considering the management of industrial land. The Fruit and Vegetable and Flower markets and their ancillary operations currently provide over 2,500 jobs and have almost 240 tenants including fruit, vegetable and flower wholesalers and catering distributors. However, as noted in the previous consent, the existing market infrastructure is no longer fit for purpose and these proposals seek to provide modern, fit for purpose market.

38 The principle of a replacement market was established in the previous outline consent, which provided for a new market in five buildings. The current proposals have come about as a result of the detailed design process undertaken in consultation with the Authority and Tenants which identified opportunities for release of further land for redevelopment due to a reduction in floorspace requirements by the Market. The new proposals provide for a market in a smaller footprint than previously consented, comprising 4 buildings and 2 car parks. The proposals incorporate a phasing and decant strategy that provides space for the markets to continue to operate during the anticipated twelve year build-out. Discussions with tenants about the decant strategy and the detailed specification of the individual units are ongoing.

39 The detailed design process also allowed for the resolution of transport and hardstanding concerns raised by traders with regards the existing consent, and allowed for an increase in the amount of the public facing retail/café element to provide a critical mass to allow it to be self-sufficient.

40 The OAPF land use strategy supports consolidation of the market operations on the main market site, and the redevelopment of surplus sites for high density mixed use housing-led intensification on the Entrance site and high density mixed office, retail and housing uses on the Northern site. The principle of the proposed development, including the consolidation of the market is therefore acceptable and accords with London Plan policy 4.4 which seeks to ensure any surplus of industrial lands allows market consolidation to meet London’s long term wholesaling needs.

Retail uses
41 The OAPF land use strategy and identifies the potential for a ‘smaller’ (relative to the one proposed at Battersea Power Station) CAZ frontage at Vauxhall, which would be a focus for new retail and office development. The London Plan notes a future proposed CAZ frontage within Vauxhall in table A2.2, subject to assessment and implementation. Although the existing consent has established the principle of retail at a certain scale on this site, the applicant has submitted a retail impact
assessment for the proposals because part of the application site lies outside of a defined town centre or CAZ frontage.

42 A total of 6,120 sq. m. (GEA) of retail floorspace is applied for across the sites, of which 3,924 sq.m. is proposed on the Apex Site, 1,758 sq.m. on the Northern Site, and the balance as small units on the other sites. As such this proposal represents a net reduction of 5,200 sq.m. of retail over the existing consent due to the elimination of the supermarket which had been part of the previous scheme.

43 The retail elements on the Apex site are seen as an important element of the ‘Garden Heart’ offer on the Apex site, providing an alternative shopping experience with direct links to the continued operation of the wholesale market, whilst the balance support the local needs on the individual sites and contribute to active frontages and vibrant public spaces. The proposed retail uses are consistent with the OAPF and CAZ policy and therefore acceptable.

Social infrastructure/community uses

44 Given the scale of the scheme and the identified need for new community and social infrastructure facilities to support development in the Opportunity Area, there is a requirement for a minimum quantum of D1/D2 floorspace, proportionate to the scale of the development. The existing consent secured a primary healthcare facility of at least 1,500 sq.m. on the Northern site, and provided for a nursery facility for pre-school children.

45 This proposal provides for 1,511 sq.m. of community use (D1), currently proposed as a GP surgery on the northern site. This accords with the Wandsworth Site Specific Allocations Document which identifies the need for a health facility on the Northern site. It also incorporates a private Gym and community football pitches, but no longer includes a nursery. It is unclear why the nursery provision secured by the previous consent has not been retained. Further information should be provided to demonstrate that despite loss of the nursery, the scheme makes an equitable contribution towards the delivery of new social infrastructure in the opportunity area and complies with London Plan policy 3.16.

Housing

46 London Plan Policy 3.3 provides explicit strategic support for the provision of housing within London. The draft Further Alterations to the London Plan sets a target for the Council to deliver a minimum of 1,812 homes annually in the Plan period 2015-2025. London Plan Policy 2.13 (and supporting Table A1.1) recognises the significant potential of the VNEB OA to accommodate new homes, and identifies a minimum of 20,000 new homes.

47 The application seeks outline permission up to 309,461 sq.m. of residential use, of which approximately 6,000 sq.m. may be used for office space instead, at the expense of 48 residential units. The outline application therefore seeks permission for a minimum 2,971 units and maximum of 3,019 units. Given the site’s context within the VNEB OA, and the strategic priority afforded to housing, the principle of housing on this site, as part of any redevelopment proposals, is therefore supported.

Affordable housing

48 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. A total of 446 affordable housing units are being proposed, representing 14.7% of total provision. The applicant has not yet submitted a financial viability report in support of its proposals, and it is therefore not possible at this stage to determine whether the application provides the maximum reasonable amount of affordable housing in accordance with London Plan Policy 3.12. Whilst this approach is broadly consistent with the agreed position for the opportunity area, recent
appraisals on neighbouring sites and a review of the VNEB DIFs tariff have demonstrated that a higher proportion of affordable housing should be deliverable given current market conditions and local values. In order to ensure compliance with London Plan policy 3.12, the submitted viability report will need to be subject to a viability assessment that demonstrates that the proposal represents the maximum reasonable amount of affordable housing that can be delivered by the scheme in the context of other section 106 and CIL requirements.

49 London Plan Policy 3.11 establishes a strategic target that 60% of affordable housing provision be for social housing (comprising affordable rent and social rent), and 40% for intermediate provision. A total of 223 affordable rent and 223 intermediate (shared ownership) units are proposed, representing a 50:50 social housing to intermediate split. This split is equivalent to that which was consented on the previous scheme and is therefore acceptable.

50 Affordable housing is proposed to be distributed among the 4 non-market sites as follows:

<table>
<thead>
<tr>
<th>Site</th>
<th>Affordable</th>
<th>Intermediate</th>
<th>Private/Market</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Northern</td>
<td>0</td>
<td>94 (5%)</td>
<td>1,773 – 1,821 (95%)</td>
<td>1,867 – 1,915</td>
</tr>
<tr>
<td>Apex</td>
<td>11 (2%)</td>
<td>101 (16%)</td>
<td>511 (82%)</td>
<td>623</td>
</tr>
<tr>
<td>Entrance</td>
<td>189 (44%)</td>
<td>0</td>
<td>241 (56%)</td>
<td>430</td>
</tr>
<tr>
<td>Thessaly</td>
<td>23 (45%)</td>
<td>28 (55%)</td>
<td>0</td>
<td>51</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>223 (7.5%)</strong></td>
<td><strong>223 (7.5%)</strong></td>
<td><strong>2,525 -2,573 (85%)</strong></td>
<td><strong>2,971 – 3,019</strong></td>
</tr>
</tbody>
</table>

Table 2: Affordable housing distribution by site

51 The distribution of affordable housing between the different sites and timing of delivery requires further discussion. The proposed breakdown of units by tenure for each site indicates that only 4.9% of units on the Northern site would be affordable, whereas 100% of the units on the Thessaly Road site would be affordable. Although the previous consent accepted the principle of 5% intermediate on the Northern Site, justification has not been provided in this case for maintaining this approach in light of the revised number of units and recent consents on adjoining sites, which achieve a mix that is more aligned with policy requirements. The approach on Thessaly Road is also of concern given the already high concentration of social housing in the area. Neither of these aspects of the proposal would contribute to the creation of mixed and balanced communities as required by London Plan policy 3.9 and is not currently supported. Furthermore, on the Northern site, the submitted layouts illustrate the opportunities for multiple cores and entrances which would easily allow incorporation of affordable rented accommodation within that site; the applicant should therefore give much more consideration to increasing the proportion of affordable housing on the Northern site and introducing an element of affordable rented accommodation on this site.

52 Given the number of sites included in the planning application, and the likely length of construction, it is strongly recommended that a review mechanism is built into the section 106 agreement to enable viability and the associated level of affordable housing to be re-appraised prior to implementation. In the event that a review determines that the scheme could viably provide a higher proportion of affordable housing, the applicant would be expected to provide any additional affordable housing in line with London Plan policy 3.12 which states that affordable housing should normally be provided on-site, but may in exceptional cases be provided off-site.

Housing choice
53 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. London Plan Policy 3.11 establishes that strategic priority be afforded to the provision of affordable family homes.

The applicant has provided an illustrative tenure mix expressed as number of units by tenure and size, as set out below.

<table>
<thead>
<tr>
<th>Unit type</th>
<th>Market</th>
<th>Affordable rent</th>
<th>Intermediate</th>
<th>Total (%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Studio</td>
<td>152</td>
<td>0</td>
<td>0</td>
<td>152 (5%)</td>
</tr>
<tr>
<td>1-bed</td>
<td>529</td>
<td>32</td>
<td>92</td>
<td>653 (22%)</td>
</tr>
<tr>
<td>2-bed</td>
<td>1,208</td>
<td>99</td>
<td>100</td>
<td>1,407 (47%)</td>
</tr>
<tr>
<td>3-bed</td>
<td>581</td>
<td>72</td>
<td>31</td>
<td>684 (23%)</td>
</tr>
<tr>
<td>4-bed</td>
<td>103</td>
<td>20</td>
<td>0</td>
<td>123 (4%)</td>
</tr>
<tr>
<td>Total</td>
<td>2,573</td>
<td>223</td>
<td>223</td>
<td>3,019</td>
</tr>
</tbody>
</table>

Table 3: Unit mix by tenure

A total of 807 units are identified for family provision (representing 26% of total units), 92 of which are within the affordable rent element (41% of the affordable rented units), and 31 within the intermediate provision, representing 14% of the intermediate units. The applicant’s approach to family housing provision provides is welcome given the strategic priority for family-sized affordable accommodation. The illustrative mix is broadly acceptable, however in order to ensure that the final scheme delivers an appropriate mix of units relative to London Plan policy 3.8, limits of deviation from the illustrative mix (on a whole-scheme basis) should be controlled by condition.

Within the market housing element, a total of 152 studio units are proposed, representing 6% of total market housing. Whilst an element of studio provision may be acceptable, the applicant should note Paragraph 2.3.18 of the Mayor’s Housing SPG which states that such units should be of exemplary design and be exceptional in the context of overall housing provision. The discussion below of residential quality raises concerns over the quality of these units, particularly with regards to key factors impacting on quality including orientation, overall size, number of units per core, and flat layout. In order to provide sufficient justification for the provision of studio units, commitments to achieving exceptional quality and ideally exceeding the Mayor’s standards must be made at this stage.

Density

The density of the development ranges from 223–451 units per hectare, depending on the site. The proposals for the Apex, Entrance and Thessaly Road sites represent appropriate densities given their public transport accessibility levels (PTAL), as set out in London Plan Policy 3.4, however the density of the Northern site is above the London Plan guidance of a maximum of 405 units per hectare for central sites with a PTAL of 4-6.

<table>
<thead>
<tr>
<th>Site</th>
<th>PTAL</th>
<th># of units</th>
<th>Residential density</th>
</tr>
</thead>
<tbody>
<tr>
<td>Northern</td>
<td>6a</td>
<td>1,867 – 1,915</td>
<td>451 u/ha</td>
</tr>
<tr>
<td>Apex</td>
<td>6a</td>
<td>623</td>
<td>351 u/ha</td>
</tr>
<tr>
<td>Entrance</td>
<td>4</td>
<td>430</td>
<td>301 u/ha</td>
</tr>
<tr>
<td>Thessaly</td>
<td>2</td>
<td>51</td>
<td>223 u/ha</td>
</tr>
<tr>
<td>Total</td>
<td></td>
<td>2,971 – 3,019</td>
<td></td>
</tr>
</tbody>
</table>

Table 4: Residential density by site
58 Whilst there is not an in-principle objection to high-density developments, proposals with densities that exceed the the London Plan density matrix guidance should be exemplary. In order to enable proper consideration against London Plan policy 3.4 and table 3.2, the applicant should provide density figures by habitable rooms per hectare based on the illustrative unit mix and should confirm that it has been calculated on the basis of net residential site area as per paragraph 3.31 of the London Plan.

Housing quality and design
59 London Plan Policy 3.5 promotes quality in new housing provision, with further guidance provided by the Mayor’s Housing SPG. Although the applicant is seeking outline permission with all matters reserved, the design and access statement (DAS) sets out indicative upper floor plans and typical apartment unit layouts for each development site to provide an indication of the residential quality. The layout for building N8 is provided in detail as full permission is sought for this scheme.

60 The flats in building N8 are generously sized, exceeding space standards and providing in excess of 5 sq.m. private amenity space per unit. The building has a maximum of 8 units per core, with 4 lifts in the core and a generous ground floor lobby. The incorporation of a double core creates a valuable opportunity to introduce affordable housing into this building as noted above. 58% of the units are single aspect with half of these single aspect units appearing to be north facing; the applicant claims that all of these units benefit from a 1.5m glazed return into a winter garden and therefore achieve a second aspect, however this does not accord with the interpretation of dual aspect units by GLA officers. Details of floor to ceiling heights have not been provided.

61 The proposal states that all other buildings proposed in outline shall meet the same standards as set out for building N8. This has not been incorporated into any design codes or other approved documents; as such it is difficult to ensure that this will be achieved at a later stage. Furthermore, the details provided in the DAS raise concerns that the proposed floor plates for the remaining buildings would preclude them from being able to achieve the same residential standards as set out in building N8.

62 This is borne out in an initial analysis of the indicative upper floor plans and typical apartment layouts set out in the DAS, where inconsistencies and omissions cast doubt on the residential quality that may be achieved within the footprints proposed. For example, building N1 is illustrated as having 12 units per core, thereby failing standard 3.2.2, and studio and 1 bed units falling well short of the Mayor’s space standards (Standard 4.1.1); buildings E6, N7 and N2 have multiple single aspect family sized units (Standard 5.2.1). Building A3 is noted as being the development within the Apex Site to accommodate affordable housing with a separate core, however the building as illustrated incorporates market rate studio flats and only one core; this configuration would be incompatible with the proposed mix. And it appears that many of the bedrooms in the flats on Thessaly Road lack windows, with most if not all of the units being single aspect which again raises concerns for single aspect family units.

63 The typical apartment layouts provided for the Entrance, Apex and Northern sites do not illustrate any private amenity space, whether balconies or wintergardens. This is further complicated by the lack of clarity on how future detailed designs could incorporate projecting balconies or inset wintergardens without breaching the proposed parameter plans and whilst adhering to the design code. The parameter plans limit the extent of balcony projections to 1.5m, and seem to be in conflict with the aspiration in the design code for generous balconies, suggesting that “depths and projections should be ‘at least’ 1.5m deep.” This latter principle would be welcomed if achieved but it is unclear whether this is realistic. Also unclear are the impacts of incorporating wintergardens on internal area measurements, which could compromise the ability to meet internal space standards.

64 As set out in the Mayor’s Housing SPG, and as detailed above, proposals above the London Plan density matrix should be exemplary. Even in the case of an outline application, the applicant
would be expected to commit to achieving the highest standards of residential quality possible across all sites. As noted above, the application is accompanied by a design code, however this code does not address questions of residential quality.

65 The applicant should therefore incorporate commitments to the various requirements of residential quality within the design code, as exemplified in the designs for building N8 where these have been achieved. Any code should also incorporate a clear and unambiguous strategy for providing private amenity space, bearing in mind the baseline standard 4.10.1 that “a minimum of 5sqm of private outdoor space should be provided for 1-2 person dwellings and an extra 1sqm should be provided for each additional occupant;” and 4.10.3 “The minimum depth and width for all balconies and other private external spaces should be 1500mm.” The indicative floor plans should be further scrutinised to ensure they meet the standards set out in the Mayor’s Housing SPG and in policy 3.5. The indicative layout plans that have been provided show some single-aspect flats, which the applicant considers to be necessary owing to the form of the buildings in which they are located. Given the scale of the proposal and the number of flats proposed, as well as the difficult conditions and layout of some of the sites, this is generally acceptable, but as set out in the Mayor’s housing design guide, single-aspect flats that are north-facing, fronting onto noise sources (such as railways or markets) or family sized, should be avoided.

66 The Housing SPG notes at paragraphs 2.1.10 and 2.1.11 that in effect schemes which depart significantly from a number of standards or from a particular standard are unlikely to be acceptable. Paragraph 2.1.12 confirms that other objectives of the London Plan, including viability, also need to be considered. In this instance, it is considered that the applicant needs to undertake further development of housing quality to ensure a convincing case is made to support the density proposed.

67 With the adoption of high density there is a responsibility to provide a corresponding level of open space within the scheme, and the commitment to providing this within the linear park and other routes, as well as other areas, is welcomed.

Children’s play space and amenity

68 London Plan Policy 3.6 seeks to ensure that development proposals include suitable provision for play and recreation. Further detail is provided in the Mayor’s Shaping Neighbourhoods: Play and Informal Recreation Supplementary Planning Guidance. Using the methodology within the Mayor’s SPC, the development across the four sites is expected to be home to approximately 697 children, 337 of which are expected to be under five years old (the applicant has calculated 659 children in the submitted ES). In accordance with the Mayor’s SPC, the development will need to provide, as a minimum, 3,370 sq.m. of door-stop play provision.

69 The applicant has provided a notional public realm strategy which suggests that a series of spaces will be located throughout the development to provide incidental play opportunities for a range of ages, with a total of 37,804 sq.m public amenity space across the four residential sites. In addition, the Apex, Northern and Entrance sites will incorporate of communal amenity space for residents up to a total of 17,718 sq.m. This provision is not tied, however, to any specific plans.

70 The applicant has noted that given the outline nature of the planning application the precise location and quantum of playspace can only be defined in subsequent detailed design phases. The applicant notes, however, that public amenity space proposed will be able to accommodate to required playspace provision, and that the potential location of play space areas has been set out as part of the landscape strategy included within the DAS. Whilst the DAS shows indicative locations where play space might be provided, it does not specify site areas which might demonstrate that there is sufficient space within the public realm to meet this requirement.

71 The indicative locations for doorstep playable space on the Apex site raise concerns as it appears that it will be in shadow most if not all of the day and overlooked in part by refuse stores at
ground level. In contrast, the Northern site appears to potentially incorporate several play areas in the linear park and communal gardens which would be welcomed, although a specific commitment of quantity should be secured. Similarly, the potential exists in the Entrance site layout to incorporate generous playspace, however the principles of quantum and location in terms of microclimate should be secured as a minimum. The Thessaly Road site appears to not include any communal playspace at all; the design code suggests there is public amenity space but this is drawn as car parking on the illustrative plans. This is a concern and should be addressed in the further development of the plans.

Although the commitment to amenity space is laudable, the applicant should include plans highlighting quantity and general location of playspace to be accommodated within the context of the public realm parameters plans, to ensure an appropriate distribution of play space is secured per site and in appropriate locations. A section of the design code should be devoted to play space.

**Urban design**

Good design is central to all objectives of the London Plan. The proposal has built on the successful elements of the existing consent, and has revisited several areas that were not fully resolved in that consent. This has resulted in a revised approach to site layout, massing and improved linkages, and has also allowed for the introduction of several areas of more detailed design, which are welcomed. However, there are still unresolved issues in specific areas that require further consideration. Given the high-density nature of the development, the design of the scheme needs to be of an outstanding design quality, and further work is required to achieve this.

**Principles of the outline scheme**

The CABE/EH best practice document *Guidance on Tall Buildings* notes that applications for developments of this scale are preferable in detailed form due to their complexity and potential impact, although the guidance recognises that for some large masterplanned schemes, it may be appropriate to accept outline applications. The scheme has the majority of its detail reserved for future consideration, including matters of appearance, landscaping, and scale, however full details for approval have been submitted for the Market Site and building N8. The submission of two of the sites in detail is welcomed.

The outline portion of the application is accompanied by parameter plans and a design code for approval, as well as a design and access statement and other illustrative materials that demonstrate how the parameter plans and design code could be translated into a detailed scheme design. The Design Codes have evolved from the existing consent to reflect the design process which has informed the illustrative plans, with welcome improvements including tighter maximum and minimum parameters established by a combination of fixed building edges and those with limited areas of fluctuation. Minimum distances between buildings are set out to ensure proper distance between buildings is maintained, and maximum building heights are established, with a flexible zone at the tops of buildings set out to allow for plant space and rooftop services to be properly screened from view. However the applicant should review the codes relating to overlooking and privacy (3.8) as it appears that the Code allows for direct overlooking for windows which are less than 18m apart. The flexibility built into the parameter plans encourages creative architectural expression in massing and facade articulation while ensuring the illustrative master plan massing is clearly delivered throughout the life of the project.

From the information presented, it is clear that there is potential for a high quality of design. However, additional details are requested in order to satisfy the Mayor that this design quality will be achieved. This information includes improved illustrative residential layouts, additional provisions within the design code, and additions to the parameter plans.
Northern site

Linear Park and site layout
77 As with the previous consent, the integration of the linear park as the centrepiece of the development on this site is welcomed. The elimination of the podium structure, which was to incorporate a supermarket along the northern part of the site is a significant improvement over the existing consent, allowing for a greater degree of permeability to Nine Elms Lane and improved views from the central park area to the river.

78 The new layout also provides for a much more generous arrival plaza between buildings N7 and N8, which was a concern raised with the previous consent. The detailed plans for building N8 incorporate a full landscaping proposal for the ‘arrival plaza’ at the eastern end of the park along Wandsworth Road, which emphasises the views west and provides a strong visual link to the park from Vauxhall. The arrival plaza leads to the central, ‘flexible’ green space which is crossed by footpaths and incorporates several areas of children’s playspace.

79 The masterplan provides for more usable, high quality open space (both residential and public) than the existing consent, and is supported. The layout of the surrounding buildings has been refined to introduce a series of blocks which address the open space and public realm more successfully, by providing frontages to the street edge and the park, and provision of shared amenity space in the form of communal courtyards. The communal courtyards for blocks N1-N4 are at the same level as the park but gated; to the south are landscaped terraces leading up to the podium open spaces for the towers. All communal gardens incorporate play space as well as general landscaping for the benefits of residents.

80 The applicant has also sought to ensure that all public open space receives direct sunlight for much of the year, which is welcomed. The applicant has noted that the locations of play space have been specifically selected with special regard to the microclimatic conditions created by the taller buildings; these locations should be secured with the outline consent, or a suitable condition to ensure these considerations inform the final design and layout of the playspace.

81 One area that would benefit from further investigation is the provision of private entrances to the ground level residential units for the northern blocks (N1-7). This proposal misses the opportunity to provide front door access directly to the public realm and instead incorporates communal entrances and private amenity space along the ground floor frontages of the flats. The design code relies on planted buffers and screens to provide privacy for private amenity at ground floor flats, which is disappointing as it will limit the amount of overlooking into the open spaces and activity along these important frontages. The proposal should be revised to ensure the provision of front entrances with defensible space which can increase overlooking from the residential units into the public realm; this should also be highlighted in the design code.

82 The design code and DAS note the importance of views and identify key views and vistas from within and outside the site that should be enhanced or created, although visualisations have not been provided of the proposed or anticipated views. Given the importance of the public realm and its contribution to the character here, as well as the potential for views from the linear park through to the river, the parameter plans should also include potential ground levels (expressed as minimum and maximum heights AOD). Further information should also be provided within the code regarding the treatment of ground floor active uses, including entrances into residential buildings, and how these will be accounted for within the detailed design.

Built form and massing
83 The applicant has engaged in a series of pre-application discussions and consultations with stakeholders including the Council to arrive at the current massing and layout, giving significant consideration to the height constraints set out in the OAPF relating to tall buildings and views.
Several aspects of this proposal represent a significant improvement over the existing consent, including the introduction of lower scale elements which reduce internal overlooking within the site, allow light into communal open spaces, create new and improved views into and out of the site, and allow for building types and layouts which reflect a style consistent with the vernacular developing in the rest of the area.

Key changes from the existing consent are the elimination of the podium for the northern blocks (noted above) and the reduction of their height from 14-16 storeys to mostly 9 storeys, with two taller elements on the eastern and western boundaries. The cluster of three tallest buildings from the existing consent have been shifted to the southern side of the site from the northeastern boundary, and their height increased by about 10 storeys, ranging from 122-180m (N8, N9 and N10). In their place along the northeastern boundary with the One Nine Elms site is an enlarged arrival plaza, a part-7, part-29 storey building (N11/N7), and a 24 storey (84m) building (N6) in the northeast corner of the site.

The DAS notes the importance of taking into account the potential impact of tall buildings on the site on adjacent sites, particularly with regards to overlooking and daylighting. As noted above, two of the consented towers on the northeastern boundary, which were 30 and 47 storeys, have been replaced by a part-7, part-29 storey building opposite the One Nine Elms towers. These changes will improve the outlook to the west for over 23 residential storeys of the River Tower and many more of the City Tower. These are considered welcome improvements on the previous scheme, and represent a beneficial impact on the adjoining One Nine Elms site.

Despite these improvements, concern is raised that the proposed 24-storey building in the northeast corner of the site (N6), being sited farther north and east than the buildings in the existing consent, may potentially create a new obstruction of views of the river from the River Tower. Whilst the protection of views from buildings are not material planning considerations, further analysis of the impact of building N6 on the River Tower should be undertaken, in consultation with the adjoining site owners, along with a review of its massing and position to consider how the proposal can minimise potential impact on the adjoining site (potentially by reallocating development quanta elsewhere on the site).

In terms of the tallest towers on site, this scheme features one 154m tower (N10) and one 180m tower (N8), with a 122m tower located between the two. All three towers are located in the zone identified as appropriate for tall buildings as set out in figures 8.3 and 8.4 of the OAPF, which also states that within the Vauxhall cluster buildings should be “in the region of 150m” in height. The exception to this is the consented City Tower on One Nine Elms, which has been accepted as the new pinnacle of the cluster at 200m, with the rationale that this would allow for a strategy of gradual stepping down in the skyline as has been embodied by the 185m St George Tower and 173m Vauxhall Square.

Paragraph 8.5 of the OAPF emphasises the importance of delivering variety on the skyline rather than building to the maximum height parameters as illustrated in figure 8.7 of the OAPF. In views from north of the river from the City of Westminster and Royal Borough of Kensington and Chelsea, the St George Tower appears as the pinnacle with an overall stepping down in height and variety in the skyline as suggested by the VNEB OAPF and has a good fit with the tall building strategy within that document.

There is concern, however, that in other views, such as LVMF views from Primrose Hill but particularly the LVMF river prospects, elements of the proposal contributes to more of a ‘plateau’ in height rather than variation on the skyline, although it is noted that once the One Nine Elms scheme is completed, much of the current proposal will be obscured in many river views. Notwithstanding this, the applicant should review the proposals and consider whether further modelling that potentially includes height reduction can be incorporated to ensure that the approach to tall buildings on the site...
is appropriate to the strategy for the wider area. Furthermore, in line with London Plan policy 7.7, which encourages public access to upper floors on tall buildings, consideration should be given to providing public access to at least one of the proposed communal roof terraces, to allow the public to benefit from the views afforded by the tallest buildings on site.

**Detailed design and architectural treatment**

90 Notwithstanding the concerns over the height of the proposed towers, the detailed design of the 180m tower is encouraging in the potential that it illustrates for the other tall buildings on the site. Consideration has been given to the volumetric composition, massing and profile of the building, the articulation of the facades, top and bottom, the interaction with the public realm at ground floor, and the provision of interior and exterior communal and private amenity spaces, with the resulting design presenting a striking and distinctive building that sets a high standard for future detailed proposals. The building is proposed to be faced in curtain wall glazing system of transparent, opaque and solid panels, with integrated vertical louvres. The quality of the material palette will be dependent on the final detail and specification, and the council should seek to secure a commitment to the illustrated quality in any permission.

91 The design code provides a series of guidelines offering in impression of how the remaining buildings on site would appear, and builds on the principles established in developing the design of building N8. The design code provides sufficient flexibility to enable the different building types to be read as related but distinct buildings. Officers are generally satisfied that the codes will ensure that there would be sufficient visual interest so that the buildings would appear interesting. However, although the design code incorporates requirements for the appearance of the base elements within the building, reference should be made to the treatment of entrances (including the provision of private entrances noted above), how these would provide legibility to the building and public realm, and the role of the base in connecting residents of the towers with the public realm and the community. There is uncertainty regarding the character of the Nine Elms Lane frontage, and the proposal would benefit from additional measures within the design code to provide greater certainty as to the intended character of the space.

**Main Market site**

**Site Layout**

92 The current application for the Market site has been submitted in full detail, in contrast to the existing consent which is in outline form. The proposal has benefited from the applicant taking the outline consent through the process of detailed design in consultation with the market and traders, which has resulted in refinement and rationalisation of the plan for the Market. The proposal shifts the gateway and entrance to the market to the south of the railway viaduct, and also incorporates the land along the southern boundary which was the ‘College Site’ in the previous consent. This has allowed land north of the viaduct to be released resulting in improved public realm and permeability on the entrance site. It also shifts the eastern boundary of the site slightly westwards, to provide more space on the Apex Site.

93 The site masterplan recognises the importance of the market to London’s economy, by providing a facility optimised to allow efficiency of circulation for the tenants and management, increased attraction with improved facilities and wayfinding for customers, supported by reliable infrastructure. The design and access statement explains that the proposed layout represents an even more efficient and fit for purpose design than the existing outline consent, increasing current operational efficiency with wider and more flexible hardstanding areas to address issues raised by the tenants with the existing consent. It incorporates a distinctive arrival space and a logical circulation strategy for vehicles and pedestrians which considers safety and security in great detail.

94 The proposal reduces the extent of the secure perimeter and area which is inaccessible to the general public, introducing more opportunities for pedestrian permeability as well as linkages north
and south, which was a weakness of the previous consent. The proposal incorporates ancillary market operations such as car washing and consolidation on the southern boundary, in place of the residential proposals on College Road.

95 This proposal also refines the idea of the transition area between the market functions and the public facing functions, as embodied by the Garden Heart/Flower Market/Retail building. This continues to act as a transition area which accommodates the administrative functions of the markets with the public facing, retail operations that form the anchor of a new ‘food quarter on the Apex Site. It also maintains a flexible approach to allow links to continue with the florists in the rail arches north of the Flower Market. The applicant’s desire to create interaction between the new buildings and the viaduct units – potentially creating a character similar to that of Borough Market – is welcomed. The landscape plan supports this by creating a space that would provide a suitable scale to appear civic in nature during non-operational market days.

96 The submission shows potential for north-south links through the railway to adjoining sites. Whilst passive provision for these links is built into the design and is welcomed, the applicant should demonstrate a commitment to continuing discussions with other stakeholders for an improved public realm offering better access through the railway viaduct, in accordance with the aspirations of the OAPF.

97 Finally, further consideration is required to ensure that the Consolidation and Van Wash uses proposed on the former College Site will not cause inappropriate environmental impacts for the nearby residential areas. The landscaping proposal for this portion of the site improves the Brooklands Passage between disparate residential areas, although it also raises concerns over the lack of overlooking and general security – this should be considered carefully before progressing further.

Scale and massing
98 The proposed market buildings adopt a scale suitable to their use and context, with the three main blocks taking the form of long industrial sheds with simple facades and roofscape, and reducing the scale to the south to reflect the residential uses in that area. The Garden Heart / Flower Market buildings are slightly taller but remain relatively modest in comparison to the proposed buildings to the east on the Apex site.

99 The ancillary buildings (car parks, waste compound, pallet store, security lodge, consolidation area and vehicle wash) are of suitable scale and mass to their use.

Architectural approach
100 The approach to elevations and materials reflects the industrial use and character of the proposals, with a limited palette of materials and colours which are used on the various building types as appropriate to their function. Flexibility is built into the exterior treatments and internal layouts for the fruit and vegetable market proposals in recognition that tenant requirements will not be confirmed until six months before construction; for the exteriors, this proposal provides for four options in a design code to allow tenants to customise their units at the appropriate time. Materials within the market would be functional, mainly metal cladding with glazed entrances, and chosen for their durability and sustainability in terms of solar heating and cooling. The ancillary buildings and Garden Heart buildings have a slightly more complex approach to elevations that introduce brick and glazing but also remain consistent with the palette on the main market buildings whilst providing some visual interest and animation to the elevations, with more windows and openings, reflecting their use.

Apex Site

Site Layout
101 This site has been enlarged on its western end with the further consolidation of the market, and the scale, mass and layout reconsidered to take into account the future Northern Line station to
the south. It has also been designed to reinforce and strengthen the idea of a ‘food quarter’ which is hoped to be a city-wide destination rather than locally focused retail in the existing consent. It introduces more detail on the approach to landscaping, with a defined central square to accommodate market stalls and pedestrian linkages through the arches to sites north of the viaduct and through to the linear park to the south and the existing residential communities in Lambeth. The site layout is orthogonal, with a clear layout of routes, good definition of building edges around public spaces, and a clear distinction between public and private spaces. The routes through the site will help to deliver the new “strategic green links” identified in Figure 7.15 of the OAPF, which is welcomed.

102 The proposal sets out landscaping and treatment proposals for the surrounding streets, including the main routes from the underground station incorporating a TfL cycle route. This level of detail is welcomed and appears to be secured in the design code. As noted above, the siting of the public playspace should be reviewed as it is likely to be overshadowed and positioned next to a vehicular roadway; alternative options should be sought and are likely to be feasible given the generous amount of public space proposed at the centre of the site and removed from vehicular traffic.

Scale and Mass
103 The proposal for this site doubles the density of the existing consent, on the basis of the anticipated improvement in transport connectivity with the introduction of an underground station across the road. The blocks along Pascal Street on the southern boundary remain restrained at 4 storeys, in response to the low-rise residential district to the south and to minimise overshadowing and microclimactic effects on the central public space to the north. The buildings to the north of the public space are 23, 16 and 26 storeys at the eastern ‘apex’ of the site, which respond to the scale set by the adjacent Sainsbury’s block (28 storeys) and the scale of buildings to the north of the viaduct, with an overall approach is one of 1-2 storey podium blocks with the taller elements coming up out of the lower scale base.

104 The height and orientation of the buildings have been established in consideration of the sunlight and shadowing impacts both on the public spaces and the residential units. Whilst the general approach to height is considered acceptable, the footprint and floorplate of some of the taller elements, especially block A1, should be refined and reduced to ensure the tall buildings appear appropriately slender and elegant. This is particularly important as the proposal is going to be very visible from the railway and over the top of the lower scale buildings to the south.

Architectural approach
105 All buildings have been submitted in outline, and would be subject to the architectural character set of design codes dealing with podiums, retail facades, viaduct and garden square facing facades, along with the specifications for medium tower and bar building typologies. The Design Code also notes the importance of relating the external appearance to the Garden Heart building which opens onto the square.

Entrance site
Site Layout
106 The relocation of the market gateway to the south provides for a slightly wider site and greater flexibility in terms of layout than the existing outline consent. The proposal features two courtyard blocks to the south of the entrance to the linear park, and a 10 storey block on the north of the site, along the Nine Elms Lane frontage. The introduction of 2 blocks to the south allows the introduction of a new east/west access road into the site from Market access road, which would also provide road access to the adjacent Royal Mail Group site. This proposal would be beneficial both in terms of reducing vehicular movements across the linear park and consolidating highway and junction capacity, and would eliminate the need for an access road across the linear park to the north, which is a substantial improvement over the consented layout. It is unclear how the elimination of the route
through the park would be secured and access from the Entrance site assured given the different ownerships and timescales; further detail on the practicalities and proposed mechanisms for implementation (i.e. legal agreements) should be submitted before stage 2.

107 This scheme continues to incorporate what officers consider to be an unnecessary built form frontage for Nine Elms Lane and the resultant insufficient width of the park where it emerges onto Nine Elms Lane. GLA officers do not consider that the proposed width at the entrance to the park would achieve this, and this would not be in keeping with the aspirations of the VNEB OAPF. The emergence of the linear park onto the road in this location would provide visual relief and an appropriate scale of setting for the buildings around it, whereas the proposed building E7 creates a barrier to the park which is only enhanced by its footprint.

108 The footprint of the building creates a sharp corner on the northern frontage to the Nine Elms Lane with the southwestern elevation angled away from Nine Elms Lane, focusing all activity and emphasis to the south of the building. This compromises the presence of the park on the main road, creating a visual barrier for those approaching from the east along the road, and further closes the views into the park. As noted in the stage 2 response to the Council for the existing consent, the deletion of what is now proposed as block E7 would be beneficial to the scheme and the linear park; that report established an expectation that any future revised scheme would offer a solution that better reflects the OAPF guidance for this end of the park. Sufficient justification for inclusion of the building has not been presented to date, and these proposals should be revisited to address this concern.

109 The proposed footprint of E7 also appears to have an awkward relationship with the adjacent Royal Mail building along the Nine Elms frontage; in most illustrations the façade of the proposal sits ahead of the adjoining building, although it is not clear if the building would share a party wall with the Royal Mail building or be separate. The design code and parameters plan should emphasise that if a building is to be retained on this site, the northwestern frontage to Nine Elms Lane should remain consistent with the building line of the adjacent building. Finally, block E7 has been identified as the ‘affordable’ block; it is disappointing therefore that this block has a higher proportion of single aspect flats (50%) and an absence of shared private amenity.

110 The design of the blocks to the south of the linear park is a good response to challenging site conditions. As noted above it represents an improvement over the previous consent particularly in the reduction of units fronting onto the Market access road and single aspect units generally. Despite this, there still appear to be bedrooms which face onto the Market access road; given the regular movements of night-time traffic, further information regarding noise attenuation for these units is required and should be secured in the Design Code. It is also unfortunate that the scheme requires two levels of podium car parking, which results in the ground level duplex units being single-aspect, particularly those on the north eastern elevation which will not benefit from direct sunlight for much of the day. The design code should address this by considering how larger window openings or higher floor-floor heights might improve the overall quality of the light into these units.

111 The presence of residential units at ground level provides the opportunity to incorporate front door access directly onto the street; it is unclear from the submitted materials whether this is achieved in this case, and as set out in the discussion above for the northern site, this should be maximised. The design codes and approved access plans should specify exactly where the residential entrances will be.

Scale and Mass

112 The proposal adopts a scale on the southern blocks that reflects the scale of the buildings consented to the east on the Royal Mail site, with lower buildings towards the south. The one taller building on site, E8, is 18 storeys and acts as the counterpoint to the tall buildings cluster on the eastern end of the linear park. Whilst the principle of the height in this general area may be
acceptable, the positioning of the tallest building to the south of the park entrance seems illogical and slightly out of place given the likely impact on overshadowing of the public realm and the building to the north. The bulk of the building is slightly overemphasised and should be reduced to ensure it achieves the aspirational ‘elegance’ for these buildings set out in the design code, and to limit the shadow it casts over the linear park.

**Character and external appearance**

The design code indicates that facades would be built to similar principles as those on buildings on the Northern and Apex sites, with a combination of Medium Tower typology and Bar Building typology. This link between the sites, located at opposite ends of the market, is welcomed. There would be sufficient variation in the scale and character of the two sites for each to offer their own identity, notwithstanding the potential for similar elevational treatment. If the intention is to provide for individual residential entrances at ground level for the duplex units, the design code should ensure there is sufficient guidance and specification in the bar building to deal with this condition.

**Thessaly Road site**

**Site Layout**

The proposal for this site incorporates a mix of affordable rented and intermediate ground floor maisonettes and upper storey flats in three 6-storey blocks. Development on this site must function as a noise screen for the consolidated market operations, while providing an acceptable environment for new residents. As such, it is accepted that the layout of this development would offer single-aspect residential accommodation, and the avoidance of single-aspect north-facing accommodation is welcomed. The typical apartment unit layouts suggest that some bedrooms would only have windows on the returns into the inset balconies, which would suggest a less than optimal residential quality, whilst others lack windows on the side returns at the end of the block. The design codes and illustrative layouts should be clear about the location of windows and proportion of openings to solids on the elevations.

The proposal incorporates private gardens for the ground floor maisonettes on the ends of the blocks, but lacks any shared outdoor amenity space or children’s play space for those maisonettes which are on the inside of the block and apartments above. This is a weakness of the proposal that must be addressed prior to stage 2.

**Scale and Mass**

The proposed scale is modest and lower than the existing consent. The proposed massing and materiality of the scheme would be appropriate and enforced by the design code; additionally the scale would be appropriate to the context of the existing buildings and enclosure of the adjacent street spaces.

**Character and external appearance**

The design code indicates that facades would be built to similar principles as the low-rise ‘bar buildings’ on the Northern and Apex sites. This link between the sites is welcomed. As above, given the intention to provide individual residential entrances at ground level for the maisonettes, the design code should ensure there is sufficient guidance and specification in the bar building to deal with this condition.

**Tall buildings and Strategic Views**

As set out in paragraph nine of this report, the buildings lie in a number of strategic views, as identified in the Mayor’s London View Management Framework. The applicant has submitted a townscape, visual and built heritage impact assessment which assesses the impacts on these strategic views along with local views and impacts on the World Heritage Site.
In views from Parliament Hill and Primrose Hill, the proposal does not appear in the background of the Protected Vistas of the World Heritage Site. Towers N8, N9 and N10 would appear the right of the permitted schemes within the emerging Vauxhall Cluster, which is well outside of the Protected Vistas. Guidance within the London View Management Framework notes that the legibility of the panoramas from these points may be improved if larger scale elements were consolidated, such as into clusters of tall buildings.

The existing consent concluded that the three tall buildings in that proposal would have a secondary relationship with the Vauxhall Tower and would be consistent with the tall buildings strategy set out in the OAPF. In the current proposal, the proposed buildings will be read within an expanded Vauxhall cluster, and N8 will be especially identifiable within that cluster given its stepped profile. The submitted views also confirm that both N8 and N10 would appear at the same height or higher than buildings that would be closer to the pinnacle of the cluster than the current proposals, and would compromise the intended strategy for tall buildings around the new pinnacle of One Nine Elms. The height of the proposed N8 and N10 should therefore be reconsidered.

In cumulative strategic river prospect views from Waterloo, Westminster and Hungerford Bridges, the towers will appear lower than or obscured by One Nine Elms, and therefore secondary to the pinnacle of the cluster. In these views, N9 would be the visible part of the development once other developments were completed, appearing much lower than other consented schemes. Although the views from these bridges are particularly sensitive with regards to impact on the setting of the World Heritage Site, the proposal would appear sufficiently removed from the Palace of Westminster that it would not harm the setting of the listed buildings within the World Heritage Site. Furthermore the proposal would not be visible from Parliament Square.

Although the cumulative impact of the proposal with other emerging and consented schemes at Vauxhall is generally acceptable, and the proposal contributes to the cluster of tall buildings and emerging as a series of individual elements on the skyline, the height of buildings N8 and N10 should be reconsidered to ensure the application complies with London Plan policies 7.11 and 7.12.

**World Heritage Sites**

By virtue of the scale of the development, and its relative proximity to the Westminster World Heritage Site (WWHS), the applicant has submitted an assessment of the impact of the development on the setting of the WWHS. The assessment concludes that the effects of the development are negligible to moderate on its own, and negligible to major when considered cumulatively with other consented development, but that the scale of change is negligible to minor. The final conclusion is that, in line with the proportionate approach for assessing magnitude of impacts set out in Appendix 4 of the SPG, the development has a Medium/Large effect on the Outstanding Universal Value of the WWHS in some cases, but that the effects would be beneficial and in line with guidance in the VNEB OAPF. As in the existing consent, the development would not compromise the ability to recognise or appreciate the strategic landmark of the Palace of Westminster in LVMF.

Officers are satisfied that the development will not have a detrimental impact on the setting of the WWHS, detract attention from this within strategic views, have an unreasonably negative impact on the character of the immediate setting, and would have a limited impact in views from within the WHS. On this basis the application complies with London Plan policies 7.10 and 7.11.

**Inclusive design**

There are a number of areas where the current proposals either do not yet meet inclusive design principles or need further clarification. Inclusive design is addressed throughout the landscaping sections of the submitted Design and Access Statement, which is welcomed. However, little information detail is provided in relation to the inclusive design of the proposed buildings within
the masterplan. As such the current documentation is not sufficiently detailed to demonstrate compliance. The applicant should provide an inclusive design strategy that covers both buildings and the public realm to demonstrate a clear commitment to meeting Policy 7.2. The Design Codes should address the Lifetime Neighbourhood principles set out in the Further Alterations to the London Plan and the Draft Accessible London SPG, and have regard to other best practice standards in achieving inclusive access in order to meet London Plan Policy 7.1.

Public realm / landscaping
126 The design of the landscaping and the public realm is crucial to how inclusive the development is for many people. The Design and Access Statement and the Design Codes submitted make clear commitment to delivering an inclusive public realm, with specific mentions of inclusive play and that the Linear Park and subsidiary spaces will promote outdoor activity and opportunities for sport and fitness for people of all ages and abilities. The strategy permits clear, continuous vehicle-free footways alongside the shared surfaces. Wherever pedestrian space is shared with vehicles, a ‘pedestrian only’ route is always provided, which is welcomed. This is welcome and in line with Policies 3.6, 7.1, 7.2 and 7.5.

Residential units
127 The applicant has all committed to ensuring all residential units will comply with Lifetime Home Standards. This is welcomed and, in line with London Plan Policy 3.8 Housing Choice. A sample layout for building N8 has been provided to demonstrate spatially the unit can comply, but it does not address all 16 of the standards. Furthermore, the Design and Access Statement does not commit to 10% of the dwellings will be wheelchair accessible or easily adaptable homes, which is disappointing.

128 The applicant should demonstrate how 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 www.london.gov.uk/sites/default/files/Housing-SPG-highres.pdf.)

129 For building N8 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 (unless the council through their Accessible Housing Register work can advise on the need in this part of the borough for a particular size of wheelchair accessible home).

Car parking
130 No detail has been provided regarding car parking for disabled and older people. The provision and future management of the blue badge parking bays for the residents should be in line with London Plan Policy 3.8. A clear strategy for the provision of the units should be provided.

131 Considering the nature and scale of the development engagement and consultation with the local access group and any local organisations of disabled people is also recommended. Further guidance is available in the Draft Accessible London SPG.

Climate change

Climate change mitigation
132 The applicant has broadly followed the London Plan energy hierarchy to reduce carbon dioxide emissions. An appropriate range of passive design features, and demand reduction measures, have been included to reduce the carbon dioxide emissions of the development. Both air permeability and heat loss parameters will be improved beyond the minimum backstop values required by building regulations. Other features include low energy lighting, and mechanical ventilation with heat recovery.
The demand for cooling will be minimised through internal blinds, the use of thermal mass and solar control glazing.

**District Heating**

133 The applicant has identified that the Vauxhall Nine Elms and Battersea district heating network (DHN) is being developed within the vicinity of the development and is proposing to connect to the network. The applicant has been in discussion with DEPDU with regards to how the development can be integrated in the DHN development plans and has provided evidence of this consultation.

134 The applicant is proposing to connect the Northern Site, Entrance Site and Apex Site to the DHN. The Garden Heart and flower market will be delivered before the DHN becomes operational and have a small heat load therefore the applicant is proposing to serve the buildings with a water based air source heat pump system in the first instance. The system will be suitable for connection to the DHN once the network becomes operational.

135 The applicant is not proposing to connect the Thessaly Road site to the DHN, stating that it is too far from the proposed network to connect. This is not supported and the preferred approach should be to also connect this element of development to the DHN unless proven unviable. The presence of the Patmore Estate to the south of the Thessaly site may in fact incentivise extension of the DHN in this direction in future phases. The applicant should confirm that the heating system of the Thessaly Road site will be designed to be suitable for district heating connection immediately or in the future.

136 The applicant is proposing to install a heat network on the sites that will be connected to the VNEB. The applicant should confirm that all apartments and non-domestic building uses on the Northern Site, Entrance Site, Apex Site and Garden Heart will be connected to the heat network.

137 The applicant should continue communication with DEPDU and the DHN delivery team to ensure that the energy centre is located in a suitable location to connect into the network as the proposed route between the US Embassy and the Market Towers (One Nine Elms) site emerges.

**Combined Heat and Power**

138 Following discussions with DEPDU the applicant is proposing to safeguard space for a 900m² energy centre on the Northern Site to accommodate install a gas fired CHP system as the lead heat source for the site heat network, should the DHN not be delivered in time. The CHP is sized to provide the domestic hot water load, as well as a proportion of the space heating. The applicant is proposing to include a 20% excess capacity in the plant to export heat to the network should excess capacity be required. This is welcome.

139 Further information on the CHP sizing, including monthly load profiles for the development, proportion to be met by the CHP and likely running hours should be provided. As information about the carbon intensity of the DHN is still unavailable, carbon savings from connection to the network have been estimated using the back-up CHP option.

140 The backup energy centre is located on the north western edge of the Northern Site. Illustrative plans have been provided.

**Renewable Energy**

141 The applicant has investigated the feasibility of a range of renewable energy technologies and is proposing to install air source heat pumps to provide heating and hot water to the Garden Heart buildings until connection to the network can be secured. Air source heat pumps are also proposed for heating and hot water of the flats at Thessaly Road. Further information on the ASHP system arrangement and likely coefficient of performance should be provided. 660kWp of solar PV are also
proposed for installation on the market buildings. Roof plans showing the proposed installation across the different sites have been provided.

142 Overall the measures proposed result in a 41% reduction in regulated carbon dioxide emissions compared to a 2010 Building Regulations compliant development, which exceeds the targets set within Policy 5.2 of the London Plan. Details of the modelling including sample DER and corresponding TER sheets and sample BRUKL sheets including efficiency measures alone should be provided to support the savings claimed, and comments above should be addressed before compliance with London Plan energy policy can be verified.

**Transport**

**Trip generation and modal split**

143 The trip generation methodology and impact assessment set out in the Transport Assessment are acceptable, with the demand generated by the development on the public transport network being mitigated by a combination of DIFS/CIL, planning obligations and conditions.

**Site access**

144 Six principal points of access to the scheme are proposed, some requiring amendments to existing arrangements. These include two non-signalised priority junctions from Nine Elms Lane and one existing signalised junction at the Entrance Site. An access is proposed onto Thessaly Road with the fifth access a priority junction on Wandsworth Road. An emergency access is also proposed from Pascal Street.

145 As part of the application at One Nine Elms (also known as Market Towers) and the previous outline permission on this site, individual priority junctions from Nine Elms Lane to the Northern Site and One Nine Elms were approved. A legal agreement is in place that forces both developers to create a single access point in this location. This type of agreement would need to be secured under the new permission. TfL is content with this arrangement but strongly encourages early discussion to agree the single access solution.

146 A secondary access on Nine Elms Lane is also proposed, primarily to serve the residential units on the Northern Site. Whilst the layout of this access was agreed as part of the previous application, given potential future changes to the layout of Nine Elms Lane, TfL is keen to ensure the design is still acceptable in both safety and capacity terms. Discussion is ongoing with the applicant.

147 Access to the Entrance Site and the Market will be provided via the existing signalised junction from Battersea Park Road. The approved scheme for Battersea Power Station proposes alterations to this junction in its final state. The junction proposals are emerging and the applicant must have regard to these in designing their access.

148 The proposals also include an access from Thessaly Road which may be used only in emergencies and an entrance to the Thessaly Road site car park. This pattern of movement and controls is considered acceptable and is covered in more detail in the Buses section below.

149 There is an existing non-signalised consented access from Wandsworth Road that serves the Apex Site and provides a secondary entrance to the market. It should be clarified whether access to the Northern Site is possible through this route. If it is possible, TfL requests controls are implemented to ensure it cannot be used as a through route.

150 A pedestrian crossing on Wandsworth Road is required to link the Linear Park to the Vauxhall Square development. This is included in the Vauxhall Square proposals and is also being investigated further as part of the ongoing work on improvements to Vauxhall Cross. If the crossing
does not come forward prior to the Northern Site being built, there may be a requirement for it to be implemented by the applicant. This should be addressed through the section 106 agreement (s106).

151 Pascal Street will be designated as an emergency access route only from the Market. Both TfL and Lambeth have aspirations to implement a shared surface approach on Pascal Street in order to provide a high quality pedestrian link to the proposed Nine Elms Underground station. Further information on how the level differences will be alleviated at this junction is requested. All highway changes will be delivered through a Section 278 agreement (s278) with TfL.

**Traffic Modelling**

152 Given changes in background traffic flows, junction designs, committed and planned developments, new traffic modelling has been undertaken. The applicant has submitted standalone junction modelling for the access junctions. It is TfL’s view that this modelling cannot fully demonstrate the cumulative impacts on the network of this and other developments in the OA, and a microsimulation model is therefore required. Further discussion is occurring with the applicant to agree the approach.

**Pedestrian / cycle connections**

153 The proposal to ensure all vehicular accesses are designed with a minimum of a 2m footway is strongly supported.

154 The Linear Park, which connects through the One Nine Elms scheme through the site via Embassy Gardens and egresses towards the Entrance Site junction with Nine Elms Lane, is incorporated into the scheme. The proposal for a legible route through the Entrance and Northern Sites is welcomed. The palette of materials should reflect the latest urban design studies (shared with the applicant) to ensure consistency in this linear park. Further discussion is required.

155 The proposal for connections between the new Nine Elms Station and the Apex Site is supported. TfL will share our urban design proposals for the station with the applicant. It is crucial that the scheme ensures the delivery of these links is possible, TfL requests further discussion on the design aspects.

156 Clarification is sought as to whether a separate archway under the railway viaduct will be retained for pedestrians and cyclists. Should this be the case, TfL requests improvements are made to this archway connection through improved lighting and CCTV. The 5 a side football pitches within the market multi-storey car park (MSCP) will be accessed directly from Thessaly Road. The proposal for no car parking associated with this use is supported.

**Parking**

157 The approach to parking is largely consistent with the approach taken through the previous application.

*Residential Parking*

158 Residential parking is proposed at the previously approved ratios, as shown in Table 1 below.

<table>
<thead>
<tr>
<th>Site</th>
<th>Ratio</th>
</tr>
</thead>
<tbody>
<tr>
<td>Northern Site</td>
<td>0.29</td>
</tr>
<tr>
<td>Apex Site</td>
<td>0.30</td>
</tr>
<tr>
<td>Entrance Site</td>
<td>0.45</td>
</tr>
<tr>
<td>Thessaly Road</td>
<td>0.24</td>
</tr>
<tr>
<td><strong>Site wide</strong></td>
<td><strong>0.32</strong></td>
</tr>
</tbody>
</table>
The VNEB OAPF recommends an average parking ratio of 0.25 spaces per residential unit across the OA. Given the location and characteristics of this site, in particular the proximity of the Northern Site to Vauxhall transport interchange, the gyratory and existing and future traffic levels it is considered that this ratio should be adhered to across the site.

TfL expects all future residents to be exempt from eligibility for car parking permits in the area and this to be secured by planning condition. The proposal for 10 car club spaces and electric vehicle charging points (EVCPs) at London Plan standards is strongly supported. The car club spaces should be secured through the s106 and EVCPs by condition. The proposal for a car parking management plan (CPMP) is supported and the framework is acceptable. The plans should be secured through the s106. The uptake of the EVCPs should be monitored through this plan with triggers identified to deliver additional passive provision.

Market Parking

The existing market site provides circa 1,500 car parking spaces, with 36,301sqm of hardstanding for LGV’s and HGV’s which is largely uncontrolled. The proposals seek to formalise the number of spaces in the market into two multi-storey car parks (MSCP), one existing and one new, along with hardstanding for the fruit and vegetable market.

<table>
<thead>
<tr>
<th>Proposed Market Parking</th>
</tr>
</thead>
<tbody>
<tr>
<td>Location</td>
</tr>
<tr>
<td>Refurbished MSCP</td>
</tr>
<tr>
<td>Flower Market MSCP</td>
</tr>
<tr>
<td>Consolidation Area / Loop Road</td>
</tr>
<tr>
<td>Fruit and Vegetable Market Hardstanding</td>
</tr>
<tr>
<td><strong>Total</strong></td>
</tr>
</tbody>
</table>

A current car parking utilisation study should be undertaken to demonstrate that the planned level of parking is appropriate for the scheme. The CPMP should also cover the market parking. EVCPs should be provided in line with the standards set out in London Plan Policy 6.13.

An appropriate level of operational and disabled spaces will need to be provided for the commercial and Garden Heart uses. Further detail on the allocation of spaces for these uses and particularly disabled spaces is required. A total of 25 disabled spaces are proposed, split between the existing and proposed MSCPs. The current level of parking represents 3% of the car parking spaces within the MSCPs. This level is considered low and should be increased. Further detail on the location of these blue badge spaces is requested together with a mechanism for increasing provision to meet demand identified in the CPMP.

Buses

In line with the Development Infrastructure Funding Study (DIFS), the applicant is required to mitigate the impact on the public transport network through the payment of a tariff. Wandsworth Council now have an adopted CIL as a result of the nature of the CIL regulations, all bus contributions must be collected via s106 contributions.

TfL has undertaken an initial assessment of the impact associated with the scheme based on the proportion of bus trips and requires further discussions with the applicant and the Council on an appropriate contribution for additional bus services, to be secured through the s106 to ensure conformity with London Plan Policy 6.7.
As a result of the new junction on Wandsworth Road, the existing bus stop is required to move. Options are being investigated and monies should be secured as part of the s106 or s278 agreement.

TfL has recently been exploring routing options for bus enhancements in the Nine Elms area. One option is to route an extension to terminate at the Power Station. TfL is currently working with the Power Station and Council to assess the option of reopening Thessaly Road for buses only to facilitate north-south connectivity. There are challenges associated with this option and TfL requires discussion with the applicant around routing a bus service from the Thessaly Road access through the Market site to egress the site onto Nine Elms Lane at the Entrance Site junction. A number of highway agreements would be necessary with TfL should this be deemed possible.

Coaches
The proposal will lead to a reduction in the provision of coach parking at this location. Demand for coach parking in and around central London is high and increasing, and this facility forms an incredibly important function as a pay and display coach park for the central London market. TfL has a strong view that the applicant should retain a minimum of a 25 coach bay pay and display parking facility on this site as part of the wider redevelopment proposals.

Further discussion is required to demonstrate how coach parking can be retained. Coaches should also be able to access the development site and drop off in a convenient place for the Garden Heart. This will ensure conformity with London Plan policy 6.8. A Taxi bay for the Garden Heart should also be identified.

Northern Line Extension
In line with London Plan Policy 6.2, TfL needs to ensure that the interface between the delivery of the NLE (in terms of the tunnels and access points) and the development is clearly managed. TfL may need to request that a construction protocol is secured through the s106 prior to any works commencing on site. Other clauses previously secured through the s106 and conditions may be requested for this scheme.

Walking and cycling
TfL welcomes the commitment to provide signage within the site using the Legible London approach. The required level of signage both within and around the site needs to be identified. This should inform a signage strategy secured by condition as well as necessary funds secured through the s106 to implement any off site provision.

The application currently commits to provide cycle parking in line with the London Plan standards (6.9), through the provision of stacks, hire bikes and conventional Sheffield stands throughout the site. It is recommended that a planning condition is used to ensure that each phase accords with the latest London Plan standard.

The market proposals show cycle parking at the following levels:

<table>
<thead>
<tr>
<th>Area</th>
<th>Proposed</th>
<th>London Plan Standards</th>
</tr>
</thead>
<tbody>
<tr>
<td>Garden Heart</td>
<td>25 spaces (undercover)</td>
<td>Retail – 5 + Employment – 23 spaces</td>
</tr>
<tr>
<td>Flower Market</td>
<td>15 spaces</td>
<td>13 spaces</td>
</tr>
<tr>
<td>Traders Units</td>
<td>68 spaces in the MSCP</td>
<td>95 spaces</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>108</strong></td>
<td><strong>136 spaces</strong></td>
</tr>
</tbody>
</table>

The proposal appears to fall short of the London Plan standards for cycle parking for the market provision. Given the nature of the Garden Heart as an attraction, a sensitivity test should be
undertaken against the trip generation and travel plan to ensure the level of cycle parking is appropriate, with a view to increasing provision from 108 to 136 spaces. Monitoring mechanisms should be implemented to deliver a greater number of cycle parking facilities when demand dictates.

175 The location of the trader’s cycle parking within the MSCP should be clarified and spaces should be available for those visiting the 5-a-side football pitches. This should be as accessible as possible by ramp or by lift and signed appropriately. CCTV should be installed and showers provided within the market.

176 TfL expects the applicant to safeguard appropriate areas of land to provide two Cycle Hire Docking Stations (one each on the Northern Site and Entrance Site). Discussion is required on the location, timing and delivery of this facility. As a minimum TfL expect at least one of the docking stations to be delivered and made available for use prior to occupation of the first phase of the development. A contribution of £300,000 should continue to be secured through the s106.

Travel Plan, construction and servicing
177 The draft travel plans are welcomed for the market and the framework residential and commercial travel plans. TfL expects the final travel plan(s) to be secured, monitored, reviewed, and enforced through the s106.

178 The construction phasing and implementation plans should be reviewed on a regular basis with TfL and the Nine Elms Construction Logistics Coordination Team. Further detail is required around the envisaged phasing of the surplus sites to understand the wider programme of works. TfL requests the applicant further investigates the use of non-road based modes of transport for deliveries and collections from the site. The Construction Logistics Plans (CLP) should be drafted in line with TfL’s new guidance available at http://www.tfl.gov.uk/info-for/freight/planning/construction-logistics-plans?intcmp=7830. A commitment from the applicant and their primary contractors to demand a higher level of safety should form a key part of the CLP, through the applicant and their contractors sign up to the standard, as well as the Fleet Operator Recognition Scheme (FORS, or equivalent). Conflict points should be identified on the freight routes to the site, with traffic and pedestrian management equipment and cycle specific safety equipment should provided. Contractor vehicles should include side-bars, blind spot mirrors and detection equipment to reduce the risk and impact of collisions with other road users and pedestrians on the capital’s roads. Please see: http://www.tfl.gov.uk/info-for/freight/safety-and-the-environment/managing-risks-wrrr.

179 TfL welcomes the principle of the surplus site Delivery and Servicing Plan (DSP). Onsite refuse and delivery movements should be confirmed for these sites by way of a tracking drawing. A framework plan together with detailed plans for each phase of the surplus sites should be secured by condition. In addition the Market and Garden Heart should have detailed plans produced. This should be secured by condition, with a mechanism to monitor performance against the targets within the plan. This will ensure conformity with London Plan Policy 6.3.

Mitigation
180 A Development Infrastructure Funding Study (DIFS) for the VNEB OA has been completed and a s106 chapter included within the VNEB OAPF (March 2012). This sets a tariff rate for the OA that will be used to calculate the total contribution required for this development. The site was within the area where s106 contributions for Crossrail will be sought in accordance with London Plan policy 6.5. The SPG made specific reference to an exception being made for the VNEB areas which as described previously has its own DIFS tariff for strategic infrastructure. In this situation, the Mayor’s CIL charge will be treated as a credit towards the DIFS tariff.
Wandsworth Council have an adopted CIL which covers the Nine Elms Area. This is chargeable as a replacement to the DIFS. An agreement is in place that a proportion of the funding through the CIL is allocated towards the Northern Line Extension and a proportion to other transport measures in the OA. TfL will need to be satisfied that all mitigation measures are secured through CIL or the conventional s106 route.

It should be noted at this stage that contributions towards any Cycle Hire scheme, Legible London, any necessary highways or public realm works (not included within the DIFS study) and bus capacity contributions are over and above the CIL and will be negotiated and secured through the s106.

Summary
In summary, TfL welcome further discussions with the applicant and Wandsworth Council on a wide range of issues including mitigation, parking, public realm and access design and the cycle hire station.

Local planning authority’s position
The Council has yet to consider a report on this application at its planning committee.

Legal considerations
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
There are no financial considerations at this stage.

Conclusion
London Plan policies on industrial land, social infrastructure, retail, housing, urban design, world heritage sites, tall buildings, inclusive design, climate change, and transport are relevant to this application. Whilst the principle of the redevelopment of this site is supported, a number of serious strategic concerns are raised, and consequently the application does not accord with London Plan Policy. The following could address these deficiencies:

- **Social infrastructure**: It is unclear why a nursery no longer forms part of the proposal. Further information should be provided to demonstrate that despite loss of the nursery, the scheme makes an equitable contribution towards the delivery of new social infrastructure in the opportunity area and complies with London Plan policy 3.16.

- **Housing**: it is not possible at this stage to determine whether the proposal provides the maximum reasonable amount of affordable housing, and therefore whether the proposal
accords with London Plan Policy 3.12. The distribution of affordable housing on the Northern and Thessaly Road sites should be reviewed to ensure the schemes allow for mixed and balanced communities, in line with London Plan policy 3.9. Limits of deviation from the illustrative mix (on a whole-scheme basis) should be controlled by condition to ensure compliances with London Plan policy 3.8. Densities should be calculated on a habitable room basis to ensure compliance London Plan Policy 3.4.

- **Housing quality**: concern is raised regarding the quality of the studio units, and mechanisms by which aspirational and illustrative elements of housing quality will be secured in reserved matters applications. Commitments to the various requirements of residential quality should be embedded within the design code, and single-aspect flats that are north-facing, fronting onto noise sources (such as railways or markets) and/or family sized, should be avoided, to ensure compliance with London Plan policy 3.5 and the Mayor’s Housing Supplementary Planning Guidance.

- **Children’s playspace**: Concern is raised regarding how the quantity and general location of playspace will accommodated and secured within the context of the public realm parameters plans, and the absence of communal play space on the Thessaly Road site. An appropriate distribution of play space should be secured per site and in appropriate locations, with a section of the design code devoted to play space to ensure compliance with London Plan policy 3.6.

- **Urban design**: concern is raised regarding the height and scale of buildings N6, N8, N10 and the bulk and mass of buildings E8 and A1. Building E7 should be reconsidered. Front doors to ground floor residential units should be maximised, and further information should be provided within the design code on internal layouts, ground floor active uses and entrances into residential buildings, to ensure compliance with London Plan policies 7.1–7.6. Consideration should be given to providing public access to at least one of the proposed communal roof terraces on the tall buildings, in line with London Plan policy 7.7. Clarification on mechanisms to consolidating access arrangements with the Royal Mail and One Nine Elms schemes should be provided. The height of buildings N8 and N10 should be reconsidered to ensure the application complies with London Plan policies 7.7, 7.11 and 7.12.

- **Inclusive design**: The applicant should provide an inclusive design strategy that covers both buildings and the public realm to demonstrate a clear commitment to meeting Policy 7.2. The layouts should demonstrate that all Lifetime Home standards are met. The applicant should commit to meeting the 10% requirement for wheelchair accessible or easily adaptable homes, and the location of these should be identified on the detailed plans; blue badge car parking must also be specified and a commitment made in car park management plans. The Design Codes should address the Lifetime Neighbourhood principles set out in the Further Alterations to the London Plan and the Draft Accessible London SPG, and have regard to other best practice standards in achieving inclusive access in order to meet London Plan Policy 7.1.

- **Climate change mitigation**: The applicant should confirm that the heating system of the Thessaly Road site will be designed to be suitable for district heating connection immediately or in the future, and should confirm that all apartments and non-domestic building uses on all sites will be connected to the heat network. Further information on the air source heat pump system and performance, along with details of the modelling including efficiency measures alone, should be provided to ensure compliance with London Plan policies 5.6 and 5.2.

- **Transport**: further discussion is required on a wide range of issues including mitigation, parking, public realm, pedestrian crossings, site access design and the cycle hire station. A microsimulation model is required. Contributions towards cycle hire, legible London, bus
capacity enhancements and CIL are required. Travel plans, construction logistics, phasing and implementation plans, delivery and servicing plans, car park management plans should all be provided and secured through the s106. Further information on coach parking, additional taxi bays and number of blue badge spaces is required.

for further information, contact GLA Planning Unit (Development & Projects team):

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