

Development, Enterprise and Environment

Kate Harrison

Town Planning
Tower Hamlets Council
Town Hall, Mulberry Place
5 Clove Crescent
LONDON E14 2BG

Our ref: D&P/336304
Your ref: PA/15/02216
Date: 20 October 2015

Dear Ms Harrison

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

I refer to the copy of the above planning application, which was received from you on 15 September 2015. On 20 October 2015, the Mayor considered a report on this proposal, reference D&P/3363/01. A copy of the report is attached, in full. This letter comprises the statement that the Mayor is required to provide under Article 4(2) of the Order.

The Mayor considers that, whilst the principle of the housing-led mixed-use redevelopment of this site, including provision of public open space and education facilities, is strongly supported, the application does not, at this stage, comply with the London Plan, for the reasons set out in paragraph 88 of the above-mentioned report. However, the possible remedies set out in the report, including those amendments proposed by the applicant, could address these deficiencies.

The application represents EIA development for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011. The environmental information made available to date has been taken into consideration in formulating these comments.

If your Council subsequently resolves to make a draft decision on the application, it must consult the Mayor again under Article 5 of the Order and allow him fourteen days to decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 to refuse the application, or issue a direction under Article 7 that he is to act as the local planning authority for the purpose of determining the application and any connected application. You should therefore send me a copy of any representations made in respect of the application, and a copy of any officer's report, together with a statement of the decision your authority proposes to make, and (if it proposed to grant permission) a statement of any conditions the authority proposes to impose and a draft of any planning obligation it proposes to enter into and details of any proposed planning contribution.

Please note that the Transport for London case officer for this application is James Forrest (020 3054 7090).

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Colin Wilson'.

Colin Wilson

Senior Manager – Development & Projects

cc John Biggs, London Assembly Constituency Member
Nicky Gavron, Chair of London Assembly Planning Committee
National Planning Casework Unit, DCLG
Alex Williams, TfL
DP9, 100 Pall Mall, London SW1Y 5NQ

20 October 2015

Westferry Printworks, Isle of Dogs

in the London Borough of Tower Hamlets

planning application no. PA/15/02216

Strategic planning application stage 1 referral

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

The proposal

Full planning permission for the demolition of existing buildings, and erection of nine buildings of up to thirty-storeys (110.90 metres AOD), comprising 737 residential units, public open space, and a six-form entry secondary school, together with ground-floor commercial floorspace and flexible office and business use, with associated access, servicing and landscaping.

The applicant

The applicant is **Northern & Shell Investments No. 2 Limited**, and the architect is **PLP**.

Strategic issues

The principle of the housing-led mixed-use redevelopment of this site, including provision of public open space and education facilities, is strongly supported. However, there are a number of outstanding strategic planning concerns relating to **housing, climate change** and **transport**.

Recommendation

That Tower Hamlets Council be advised that, whilst the principle of the proposal is strongly supported, the application does not comply with the London Plan, for the reasons set out in paragraph 88 of this report. However, the resolution of those issues could lead to the application becoming compliant with the London Plan.

Context

1 On 15 September 2015 the Mayor of London received documents from Tower Hamlets Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor has until 26 October 2015 to provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under 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 Tower Hamlets Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or allow the Council to determine it itself.

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 6.1 hectare site is located adjacent to Millwall Outer Dock, on the Isle of Dogs. The site is bound to the north by rear gardens to residential properties, a leisure centre, and business uses; to the east by an industrial complex and data centre; to the south by Millwall Outer Dock, and to the west by Westferry Road. The site currently comprises printworks, associated offices and car parking, in a large three to four-storey building.

7 The nearest part of the Transport for London Road Network, the A1203 Aspen Way, is located 1.2 kilometres to the north of the site; there is no Strategic Road Network within the vicinity. The site is served by three bus routes, with the nearest stops located on Westferry Road. Crossharbour Docklands Light Rail station is located approximately 400 metres to the east, linked by the Pepper Street bridge. Consequently, the site’s public transport accessibility level ranges from two to three (on a scale of one to six, where six is excellent and one is very poor). The site is also served by the Mayor’s Cycle Hire Scheme; the nearest docking station is located adjacent to the Millharbour entrance to the site, and provides eighteen docking points.

8 The site sits within a number of strategic views and river prospects, as identified in the Mayor’s London View Management Framework, including View 5A.1: Greenwich Park; View 6A.1 Blackheath; View 11B.1: London Bridge, and View 11B.2: London Bridge, as well as within the wider setting of the Maritime Greenwich World Heritage Site. The site is located within the draft indicative boundary of the Isle of Dogs and South Poplar Opportunity Area Planning Framework. At the local level, the site is allocated for mixed-use housing-led redevelopment within the Council’s Managing Development Document, and sits within the surrounding context of the Council’s South Quay Masterplan Supplementary Planning Document.

Details of the proposal

9 Northern & Shell Investments No 2 Limited (the applicant), is seeking full planning permission for the demolition of all existing buildings, and the redevelopment of the site to provide 737 residential units, a total of 3,881 sq.m. of commercial floorspace to include retail, cafe/restaurant and office provision, a six-form entry secondary school, and 955 sq.m. community floorspace. The proposal comprises nine buildings ranging in height from four to thirty-storeys (110.90 metres AOD), and includes a distinct area of publicly accessible open space intended for use as a public park (6,353 sq.m.), in addition to open spaces and private amenity space located throughout the development.

Case history

10 The application considered here was subject to formal pre-planning application discussions with GLA officers, with four formal pre-planning application meetings being held on 6 March 2014, 22 May 2014, 27 August 2014, and 29 October 2014, together with six informal design reviews in 2014 and 2015. GLA officers welcomed the opportunity to proactively engage with the applicant at an early stage in the development process, which resulted in significant improvements to the scheme. The principle of the housing-led redevelopment of this site, which includes public open space and education provision, was strongly supported. However, a number of concerns were raised regarding quantum of development and density, housing, urban design and tall buildings, inclusive design, sustainable development, and transport.

Strategic planning issues and relevant policies and guidance

11 The relevant issues and corresponding policies are as follows:

- Housing *London Plan; Housing SPG; draft interim Housing SPG; Housing Standards Policy Transition Statement; Housing Strategy; Shaping Neighbourhoods: Play and Informal Recreation SPG; Shaping Neighbourhoods: Character and Context SPG; Social Infrastructure SPG*
- Affordable housing *London Plan; Housing SPG; draft interim Housing SPG; Housing Standards Policy Transition Statement; Housing Strategy*
- Density *London Plan; Housing SPG; draft interim Housing SPG; Housing Standards Policy Transition Statement; Housing Strategy*
- Urban design *London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG; draft interim Housing SPG; 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*
- Access *London Plan; Accessible London: achieving an inclusive environment SPG*
- Blue Ribbon Network *London Plan*
- 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*
- Parking *London Plan; the Mayor's Transport Strategy*

12 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is Tower Hamlets Council's Core Strategy (2010) and Managing Development Document (2013), and the London Plan (Consolidated with Alterations since 2011). The draft Minor Alterations to the London Plan (2015), the Council's South Quay Masterplan Supplementary Planning Document (2015), and the National Planning Policy Framework and Technical Guide to the National Planning Policy Framework, are also relevant material considerations.

Principle of development

13 The site lies within the Isle of Dogs and South Poplar Opportunity Area, as identified in the London Plan. London Plan Policy 2.13, and Table A1.1, states that the Opportunity Area is capable of accommodating at least 10,000 homes, and 110,000 jobs up to 2031. The London Plan recognises that the north of the Isle of Dogs forms a strategically significant part of London's world city offer for financial, media and business services. The site is not identified for employment use within the London Plan.

14 At the local level the site is designated within the Council's Managing Development Document as being suitable for comprehensive mixed-use redevelopment to provide housing, a secondary school, publicly accessible open space, an expanded leisure facility, a district heating facility, and other compatible uses.

15 Notwithstanding the strong support for the delivery of a substantial proportion of housing within the Isle of Dogs and South Poplar Opportunity Area, as set out in the London Plan, there is strategic concern regarding the significant quantum of emerging proposals and the potential barriers to the delivery of this development, which includes the need to secure the social and physical infrastructure required to support this very significant scale of growth. In response to these concerns, and to address issues arising from the scale of development proposed, the Council has produced a Supplementary Planning Document for the South Quay area, the principle of which is broadly supported by the GLA. Whilst outside of the boundary of the SPD, the site sits within its immediate context.

Housing

16 London Plan Policy 3.3 provides explicit strategic support for the provision of housing within London, and sets a target for the Council to deliver a minimum of 39,314 homes in the Plan period 2015-2025. London Plan Policy 2.13 (and supporting Table A1.1) recognises the significant potential of the Isle of Dogs and South Poplar Opportunity Area to accommodate new homes, and identifies a minimum of 10,000 new homes. Given the site's context within the Isle of Dogs and South Poplar Opportunity Area, and in light of the Council's local policy designation, the principle of the housing-led redevelopment of this site, to include 737 new homes, is therefore supported.

School and community infrastructure

17 As set out in the London Plan, more effective coordination of social infrastructure, especially schools to support growing local needs, is required within the Isle of Dogs and South Poplar Opportunity Area. Furthermore, London Plan Policy 3.18 makes clear that the Mayor will support provision of childcare, primary and secondary school, and further and higher education facilities adequate to meet the demands of a growing and changing population, particularly where these can be co-located with housing in order to maximise land-use and reduce costs.

18 In recognition of the need to ensure adequate social infrastructure, especially schools, within the Isle of Dogs, and in accordance with the site's local designation, the application includes a six-form entry secondary school, together with a sixth-form. This comprises 10,375 sq.m. of education floorspace located within two self-contained buildings at the north-western section of the site. The inclusion of a new secondary school as part of this application is strongly supported in accordance with London Plan Policy 3.18.

19 In addition to the provision of a secondary school, the application also includes 955 sq.m. of health and community uses, which could be used for a health centre, community centre and/or creche. The provision of these additional community and social infrastructure uses is supported.

20 The Council's site designation includes the potential provision of an expanded leisure centre; the supporting text within the development document states that "*The potential for the co-location of dry sports facilities with the secondary school and the Tiller Leisure Centre should be explored to ensure the borough meets its leisure needs*". The school proposal includes provision of three MUGA's, and has been designed to ensure that the sports facilities are independently accessible, distinct from main teaching areas, thereby allowing for dual community use, and meeting wider leisure needs in response to the site designation. This is supported.

Open space

21 In accordance with London Plan Policy 7.18, and in light of the significant potential for substantial change within the Isle of Dogs, it is important that sufficient publicly accessible open space is provided as part of emerging development proposals in the area. Furthermore, the site's local designation explicitly includes the provision of publicly accessible open space.

22 The application includes a total of 1.95 hectares of public open space, which includes the provision of a 6,353 sq.m. distinct public park at the eastern end of the site, comprising ball courts, all weather MUGA pitch, informal hard courts, in addition to lawn and planted areas. The proposal also includes a series of spaces adjacent to Millwall Outer Dock; a 1,864 sq.m. area of green space at the western section of the site, and a further 1,308 sq.m. garden space, which will also be open to the public.

23 The provision of public open space is strongly supported in accordance with London Policy 7.18, the Council's site allocation, and the principles of the Council's South Quay Masterplan. The provision of the dockside promenade, to include walking and cycling routes as well as incidental areas for play and recreation, fully accords with the Blue Ribbon Network principles of the London Plan, and helps provide a recreational setting to the dock, improving its setting and the ability for it to be appreciated, and is particularly supported. The Council should robustly secure the public use of the three proposed open spaces as part of any future grant of planning permission.

Commercial floorspace

24 As set out above, London Plan Policy 2.13 (and supporting Table A1.1), makes clear that there is scope to convert surplus business capacity south of Canary Wharf. The printing facility, comprising 43,281 sq.m. of B2/B8 floorspace, has been vacant since the operator relocated in 2012, and the site's local designation seeks a housing-led redevelopment. In this context, the loss of the existing quantum of employment floorspace does not raise strategic concern.

25 The proposal includes the potential for small business units, with 2,340 sq.m. identified for business use across eight units. Given the site's location in close proximity to Canary Wharf financial centre, the provision of business space is strongly supported.

Retail

26 The application includes the provision of 1,541 sq.m. of retail floorspace, across five units; one unit is identified for solely retail use (Use Class A1), with the remaining intended for restaurant and drinking establishments (Use Class A3/A4).

27 In accordance with London Plan Policy 4.7, it is vital that large-scale retail be appropriately focused within the Isle of Dogs town centre network, and through pre-planning application discussions, the proportion of retail has been reduced. However, the provision of a small-scale mix of uses as part of high-density development within Opportunity Areas can help to meet the needs of local residents, and also assist in activating the ground-floor. The inclusion of retail space as part of this development is of an appropriate scale to be ancillary to the residential, education, and business uses, provides active uses at ground-floor, and is therefore supported in accordance with London Plan policy.

Summary

28 As set out above, given the site's context within the Isle of Dogs and South Poplar Opportunity Area, the site's local designation, and the strategic priority afforded to housing, the principle of the housing-led redevelopment of this site is supported. The application includes the provision of a secondary school, in addition to public open space, and supporting business, commercial and community uses. The school, public open space, and community uses will ensure the delivery of key infrastructure within the Isle of Dogs, responds positively to strategic requirements and the priorities of the Council's site designation, and as such is strongly supported.

Housing

29 The application includes a total of 737 residential units. A detailed housing schedule is provided below:

unit type	market	affordable rent	intermediate	total
one-bed	258	17	4	279
two-bed	239	16	2	257
three-bed	164	19	3	186
four-bed	6	8	1	15
total	667	60	10	737

housing schedule - as submitted

Affordable housing

30 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. The proposal currently includes seventy affordable units, which represents 9.5% of overall housing provision (11% when measured by habitable room). The applicant has submitted a financial viability report in support of its proposals, which is being independently assessed by the Council. 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.

31 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. The Council, in its Managing Development Document, requires proposals to provide affordable housing on a 70:30 social housing to intermediate housing split. The affordable housing is currently split 86:14, when measured by units, which is not in accordance with strategic or local policy.

32 In response to concerns raised by GLA officers following submission of the application regarding the tenure split, which is heavily skewed towards social housing, an amended mix has subsequently been proposed by the applicant. At the time of writing this report, the amended mix is in draft, and has not been formally submitted to the Council.

unit type	market	affordable rent	intermediate	total
one-bed	237	18	15	270
two-bed	224	7	11	242
three-bed	176	0	17	193
four-bed	6	0	8	14
total	643	25	51	719

housing schedule – proposed amendments

33 The proposed amendments to the housing mix also incorporate concerns raised by the Council with regards to family sized intermediate units; four family intermediate units are proposed to be removed, with intermediate provision directed towards one and two-bed accommodation. The resultant mix provides for six additional affordable units, bringing the total affordable housing provision to 10.5%, with a 67:33 tenure split. The proposed tenure split better accords with strategic policy, which is supported, and the proposed shift in intermediate family provision raises no strategic concerns. Therefore, should the amended housing schedule be formally submitted, the proposal would accord with London Plan Policy 3.11.

Housing choice

34 London Plan Policy 3.8, together with the Mayor’s Housing SPG, seeks 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 proposal, as currently submitted, includes 201 family units, equating to 27% of overall housing provision. Within the proposed amended housing schedule, a total of 207 units are identified for families, equating to 28% of overall housing provision. In accordance with strategic policy, the applicant has prioritised family affordable provision in both scenarios; 25 of the family units are identified as affordable (in the proposed amended scheme), equating to 33% of total affordable housing provision, and 49% of the affordable rent provision. This is supported.

Density

35 The density of the development as submitted is 445 habitable rooms per hectare. This is within the London Plan guidance range of 200 to 650 habitable rooms per hectare for urban and central sites with a public transport accessibility level of two to three, as set out in London Plan Policy 3.4. An amended density figure has not been provided, although the indicative housing schedule provided above is not predicted to significantly alter the density of the development.

36 As detailed in this report, the application includes the provision of public open space, as well as education facilities, and an appropriate mix of ancillary uses. The proposal provides an appropriate level of family accommodation, exceeds London Plan policy requirements relating to children's play space, and does not raise any concern with regards to height, bulk and massing. In this context, the density of the proposal does not in itself raise strategic concern. However, the applicant should note comments made in this report regarding residential quality.

Housing quality and design

37 London Plan Policy 3.5 promotes quality in new housing provision, with further guidance provided by the Mayor's Housing SPG, draft interim Housing SPG, and the Mayor's Housing Standards Policy Transition Statement. As set out in the Mayor's Housing SPG, proposals above the London Plan density matrix should be exemplary. Key factors such as floor-to-ceiling heights, orientation, maximising ground-floor individual access points, and number of units per core, are all essential to achieving high residential quality, and are of particular importance when assessing residential quality.

38 The submitted application raises a number of concerns with regards to residential quality, as set out in the urban design section below, relating to number of units per core and the proportion of single-aspect units. The applicant has responded positively in discussions post planning submission with a view to amending the scheme to address the concerns raised, which is strongly supported. In addition to the need to submit formal amendments, a full assessment against the standards and proposed standards set out in Annex 1 of the draft interim Housing SPG and the Mayor's Housing Standards Policy Transition Statement is also required, to include a table setting out the size of all units, and clarification of the overall percentage of units which fail Average Day Factor.

Children's play space and amenity

39 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. GLA officers have calculated that the development will be home to 504 children, 204 of which are expected to be under five years old.

40 The applicant has submitted a comprehensive play strategy. Within the development, a series of spaces are proposed, which are intended to provide play opportunities, in addition to general residential amenity. The proposal incorporates 3,495 sq.m. of dedicated play space, including incidental doorstep play for the younger children located within the communal courtyards, and dedicated facilities within two areas of public open space. This is in addition to general private residential amenity spaces located throughout the development, as well as the general amenity of the public park spaces.

41 The overall approach to play and recreation will ensure high-quality facilities will be provided that exceeds the needs of the children of this development. Critically, the development will also provide publicly accessible external play opportunities set within areas of public open space, which is strongly supported.

Urban design

42 Good design is central to all objectives of the London Plan, and given the scale of development proposed, its design needs to be of an outstanding quality. The proposed development has been subject to extensive pre-application discussions, and whilst the overall approach is largely supported, there are a number of outstanding issues that need to be addressed. A series of proposed amendments have been discussed with the applicant, which could address the issues raised, as set out below, although at this stage these have not been incorporated into the planning application.

Layout

43 The proposed development is structured on a legible and permeable street layout that knits in well with adjacent sites and the surrounding area; this ensures that the three major public open spaces, school and waterfront will be easily accessible to existing as well as future residents, which is strongly supported. The changes to the scheme secured at pre-application stage that allowed for the creation of a large open space anchoring Millharbour and directing people to the waterfront and the links to Tiller Road, is particularly welcomed.

44 The aspiration of a vibrant and active waterfront is strongly supported, and the provision of retail uses looking onto the dockside at the foot of each of the four point-blocks positioned along the waterfront will go some way towards achieving this. However, there remains concern regarding the amount of inactive frontage facing this space due to the open nature of the residential U-shaped blocks. Following submission, and in response to concerns raised by GLA officers, the applicant has proposed revisions to the scheme to locate residential foyers facing the waterfront on the gable ends of the blocks, and a landscape design which provides ample seating covering the car-park vents and encouraging the use of this space, which is welcomed. Should the amended ground-floor layouts be formally submitted to the Council, the revisions would address concerns raised, and as such the proposal would be supported with regards to design layout.

45 The rest of the ground-floor layout is carefully designed to minimise levels of inactive frontage, and provide a good distribution of front entrances throughout the public realm, ensuing all publicly accessible spaces feel safe and inviting, which is strongly supported.

Residential quality

46 Whilst there are a number of positive elements with regards to residential quality, there also remain a number of outstanding concerns. All cores are accessed directly from the public realm, and the floor plates are well-proportioned, which is strongly supported. However, officers are concerned that some of the blocks have a higher than recommended number of units sharing the same landings, undermining their sense of ownership and creating a high proportion of single-aspect flats on each floor. GLA officers have discussed the possible resolution of this issue with the applicant, and amendments have subsequently been proposed which include the provision of extra cores, which is welcomed. Should the amended residential layouts be formally submitted to the Council, the revisions would address concerns raised relating to units per core.

47 In addition to the need to submit the draft amendments, and to allow for a full assessment of the proposal against London Plan housing quality standards, the applicant should submit a detailed review of the proposal against the standards and proposed standards set out in Annex 1 of the draft interim Housing SPG and Mayor's Housing Standards Policy Transition Statement, to include a table setting out the size of all units, in addition to clarification of the overall percentage of units which fail Average Day Factor.

Height and strategic views

48 The overall massing of the scheme is arranged in a number of linear blocks ranging from four to eight storeys in height, and five point-blocks of eight, nine, thirteen, seventeen and thirty-storeys. The lower blocks provide good definition and enclosure of the public realm network, with the higher blocks helping to mark the dockside and its proposed increased leisure role. The height and massing of the development has been designed so as to minimise significant overshadowing over the proposed public open spaces, which is welcomed.

49 As set out in paragraph eight of this report, the buildings lie in a number of strategic views, as identified in the Mayor's London View Management Framework, and as such, the applicant has submitted a detailed townscape, visual and built heritage impact assessment. This assessment demonstrates that in View 6A.1 Blackheath; View 11B.1: London Bridge, and View 11B.2: London Bridge, the development does not raise any strategic concern.

50 The proposals' appearance in strategic view 5A.1 from Greenwich Park is particularly relevant, with the buildings being visible towards the left in this view. Guidance within the London View Management Framework notes that the existing cluster of tall buildings adds layering and depth to the understanding of the panorama, and states that the composition of the view would benefit from further, incremental consolidation of the tall buildings. Furthermore, as identified in the Framework, the primary consideration in this view is how the significance of the axis view from the Royal Observatory towards Queen Mary's House could be appreciated.

51 Following a detailed review of the applicant's impact assessment, GLA officers are satisfied that, although the buildings will be visible in the Greenwich Park Panorama, they do not impact on the axial view across Queen Mary's House. Furthermore, although distinct from the main cluster at Canary Wharf, the development will contribute to the layering of buildings in this view, particularly given their gradual stepped form, and by virtue of their lower height, do not compete with the larger scale tall elements within the main cluster. The buildings do not therefore raise strategic concern with regards the strategic view from Greenwich.

52 The proposal also falls within the wider setting of the Maritime Greenwich World Heritage Site. London Plan Policy 7.10 'World Heritage Sites' states that development should not cause adverse impacts on World Heritage Sites or their settings, and, in particular, should not compromise the ability to appreciate outstanding universal value, integrity, authenticity or significance. The applicant's townscape, visual and built heritage impact assessment illustrates the proposal will not adversely impact on the universal value, integrity, authenticity or significance of these important heritage assets. The buildings, although positioned to the left of the main Canary Wharf cluster, are of a lower scale to those in the emerging cluster, and by virtue of their stepped form, help to provide further layering and variation in scale in this view. The buildings do not therefore raise strategic concern with regards to the Maritime Greenwich World Heritage Site.

Architectural treatment

53 Whilst the indicative appearance of the development is supported, the final choice of materials and quality of detailing will have a significant impact on quality. The Council is therefore strongly encouraged to secure the retention of the architects during detailed design phases, in addition to utilising appropriate conditions securing design detail and materials.

Blue Ribbon Network and flooding

54 The southern section of the application site sits adjacent to Millwall Outer Dock, which forms part of the Blue Ribbon Network, as identified by the London Plan. London Plan policies acknowledge the important role that London's waterbodies have in promoting water-related uses, as well as providing important habitats, landscapes and views. Millwall Outer Dock is currently used for sailing, an activity which is supported by London Plan Blue Ribbon Network policies.

55 The proposal includes two areas of public open space located immediately adjacent to the dock at the eastern and western ends of the site, in addition to providing an improved dockside walkway, providing new dockside spaces where residents and the wider community can meet, gather, enjoy, and appreciate the dock setting. These critical pieces of green infrastructure are strongly supported, and will maximise the value to be gained from the site's dockside location.

56 Given the existing use of Millwall Outer Dock for recreational sailing activities, and in accordance with London Plan Policy 7.27, it is vital that the proposed development does not adversely impact on conditions within the dock, specifically in relation to wind and microclimate, to a degree so as to impact on the ability to retain its use for sailing. The applicant is currently working with the Council and the sailing club to ensure, through wind tunnel testing and appropriate assessments, that the development does not have a significant impact, and any appropriate mitigation measures are secured.

57 The site is located within flood zone 3. The applicant's flood risk assessment confirms that the site is at risk of surface water, sewer and tidal flooding, with the main risk of tidal flooding being well protected against. The assessment has examined likely breach scenarios and considered residual flood risk, which demonstrates that almost all of the site would remain dry under breach conditions, with a safe dry route via the north-east of the site to Millharbour. The assessment also confirms that all residential accommodation will be located above any likely flood level, flood resilient construction will be considered, and flood information packs will be prepared for residents, businesses and the school. Taken together these measures present an appropriate response to the flood risk present at the site.

58 The assessment and accompanying drainage strategy propose a 50% reduction in surface water discharge. This would be achieved through the use of permeable surfaces, attenuation tanks, and a small area of direct discharge to the adjacent Millwall Outer Dock. The system is designed not to discharge up to the one in two year event. Given the proximity of Millwall Outer Dock, there is scope to divert more of the clean rainwater to the dock, rather than the local combined sewer. This would also reduce construction and operational costs associated with the proposed large volume attenuation tank. The proposals also appear capable of incorporating more landscaping features, which could be designed to maximise rainwater storage and absorption. As such, the application is capable of further reducing surface water run-off to the combined sewer, and the applicant should revise its approach, increasing sustainable drainage techniques and use of direct discharge to the dock, to ensure full compliance with London Plan Policy 5.13.

Inclusive design

59 In accordance with London Plan Policy 3.8, the applicant has confirmed that all of the residential units will meet Lifetime Homes standards, and that 10% of the units will be designed to be fully adaptable and adjustable to wheelchair users. As set out in the Mayor's Housing Standards Policy Transition Statement, the Council should secure compliance with building regulations M4 (2) and M4 (3) by condition.

Climate change - adaptation

60 The proposal includes a number of measures in response to strategic policies regarding climate change adaptation, which are welcomed. Measures proposed include sustainable drainage measures, use of low energy lighting and energy efficient appliances, smart meters, high levels of insulation, low water use sanitary-ware and fittings, and biodiverse roofs. The applicant should note comments made in paragraph 58 of this report regarding the need to increase sustainable drainage techniques, including for storage and absorption.

Climate change - mitigation

Energy efficiency

61 The applicant has broadly followed the London Plan energy hierarchy to reduce carbon dioxide emissions. Both air permeability and heat loss parameters will be improved beyond the minimum backstop values required by building regulations. Other features include mechanical ventilation with heat recovery, low energy lighting and a building management system.

62 In accordance with London Plan Policy 5.9, the applicant should demonstrate how the risk of overheating and the cooling demand has been minimised for each building type. The applicant should also outline appropriate mitigation measures for any local air quality issues, ground-floor units, and single-aspect units. Dynamic overheating modelling in line with CIBSE Guidance TM52 and TM49 should also be provided.

63 To allow for a full assessment of the energy efficiency measures and carbon dioxide emission savings for the first step in the London Plan energy hierarchy, the applicant should provide updated emission figures including the school, together with DER, TER and BRUKL worksheets.

District heating and renewables

64 Barkentine district heating network is located within the vicinity of the application site. The applicant reports that there is no spare capacity in the existing energy centre without upgrading the heat capacity, and no definitive timescale for necessary upgrades. This will need to be robustly evidenced, taking full account of the Council's site allocation requirements with regards to the provision of a district heating facility on this site.

65 The applicant is proposing to install a site-wide heat-network, designed to allow for future connection to a district system, served by two gas-fired combined heat and power (CHP) units. The applicant should confirm that all residential units and non-domestic buildings, including the school, will be served by CHP, and provide a site plan showing the proposed route of the heat network. Furthermore, monthly load profiles, confirming the sizing of the proposed CHP units and what proportion of space heating and hot water will be delivered, need to be provided, in addition to how the unit will be managed to optimise its operational efficiency. The applicant is proposing two energy centres. The provision of a single energy centre should be robustly explored in the first instance, and discussed further with GLA officers. Finally, updated emission figures, including the school, should also be provided.

66 The applicant is proposing photovoltaic panel modules covering 1,389 sq.m. of roof area. Plans confirming the location and distribution of the panels should be provided.

Summary

67 Overall the measures proposed result in a 42.7% reduction in regulated carbon dioxide emissions compared to a 2013 Building Regulations compliant development. The applicant should fully address all comments made above, and provide updated emission figures, to include the school.

Transport

Parking

68 A total of 404 basement car parking spaces are proposed, of which 376 are allocated for residential use, with the remainder allocated for commercial use as Blue Badge only. Of the residential spaces, 76 are reserved as Blue Badge only. A total of 20% of all car spaces will be for electric vehicles, with an additional 20% passive provision for residential, and 10% for commercial spaces. The resultant car parking ratio, at 0.51 spaces per unit, is higher than the 0.3 spaces per unit typically secured for schemes on the Isle of Dogs, and whilst TfL acknowledges that this site is not as accessible as other recent developments, the scale of development proposed results in a high quantum of car parking.

69 Preston's Road Roundabout, one of the main vehicular routes to the Isle of Dogs currently suffers from existing peak hour congestion. The applicant has submitted highway modelling which shows that the development will exacerbate congestion in this location. TfL and the Council has commissioned a study to consider how accessibility can be improved while maintaining the strategic movement of the junction. TfL will review the applicant's modelling further, and may request a contribution to mitigate the impact of additional vehicular trips at this location.

70 The quantum of Blue Badge, and Electrical Vehicle Charging spaces is acceptable in accordance with London Plan policy, although there are opportunities for the Blue Badge parking to be located nearer to the residential cores, which should be explored further. The Council should secure a car parking management plan by condition, in addition to a car-free legal agreement, restricting all occupiers from applying for a local on-street parking permit.

Trip generation

71 Whilst the applicant has submitted a multi-modal impact assessment, this is not sufficiently robust, and through discussions with the applicant post submission, TfL has requested further information. Notwithstanding concerns relating to the non-education element, the approach adopted for the school trip generation is acceptable.

Cycling

72 The applicant proposes 1,533 cycle parking spaces, which accords with London Plan standards. Spaces are appropriately located at both the ground-floor, and in the basement, with the long-stay commercial parking located in the vicinity of each unit. TfL has recommended design changes in line with the London Cycle Design Standards, which should be incorporated fully by the applicant. The applicant should also identify the location of visitor cycle parking spaces.

73 Given the scale and mixed-use nature of this development, it will create considerable demand for cycle hire, and as such, the Council should secure a contribution of £70,000 within the section 106 agreement to extend one of the two nearest docking station, in accordance with London Plan Policy 6.9.

Public transport

74 Subject to agreeing the applicant's trip generation, TfL will confirm what mitigation for public transport will be required. In line with other recent developments, a bus contribution will be sought to mitigate the impact on the Westferry Road corridor, which is already operating close to capacity.

75 The applicant's proposal to lengthen the nearest bus cages and relocate a northbound bus stop away from an existing primary school is supported and in line with the safety audit. However, TfL should be consulted at detailed design stage. In addition, new infrastructure should be in place before any existing facility is removed, and any relocated shelters should be replaced by the new Landmark London Style shelter.

76 To assist in mitigating the impact of school trips on the local public transport network, the applicant should consider staggering the start and finish time of the school, and promote before and after school clubs within the travel plan.

Pedestrian environment

77 A Pedestrian Environment Review System (PERS) audit has been submitted, which has identified the lack of formal crossing across Westferry Road. Accordingly, the development will incorporate a zebra crossing. TfL are reviewing local connections as part of the Isle of Dogs and South Poplar Opportunity Area Planning Framework, and acknowledges the potential benefits to pedestrians from the proposed crossing. However, the impact on bus performance, and to what extent this crossing will add to any delay to bus journeys, will need to be assessed before the crossing can be accepted.

78 In accordance with London Plan Policy 6.10, and to assist with wayfinding in the area, the Council secure section 106 funding towards the provision of additional Legible London signage within the site and also its vicinity.

79 Traffic management is proposed on the internal roads, which is supported in reducing vehicular speeds. The walking and cycling path adjacent to the dock is welcomed, and street furniture clutter should be minimised to ensure its effectiveness as a route.

Travel planning, access and servicing

80 Vehicles will access the development from either Westferry Road or Millharbour, and route through the site to dedicated loading and unloading points. The school is provided with its own service delivery area accessed from Millwall Dock Road. The swept path analysis submitted has been reviewed and raises no concerns. The applicant has submitted a delivery and servicing plan, although this should be updated to address how the applicant will reduce the number of freight trips to the site. The final document should be secured by the Council through condition.

81 A framework construction logistics plan has also been provided, which is welcomed. However this should also be updated to address how freight will be arriving to the site across the day in order to allow for an assessment of peak trips. In addition, a feasibility study of utilising the adjacent dock during demolition and construction should be secured by the Council through condition. This should be referenced within the construction logistics plan, the final version of which should also be secured by condition, to be discharged in consultation with TfL.

82 The applicant has submitted a single framework travel plan for the site. However, separate residential, workplace and school travel plans should be provided. Whilst the content of the framework is broadly acceptable, targets need to be included for each separate plan.

Mayoral Community Infrastructure Levy and Crossrail

83 In accordance with London Plan Policy 8.3 the Mayor agreed to commence CIL charging for developments permitted on or after 1 April 2012. The charge for Tower Hamlets is £35 per square metre Gross Internal Area. The Council has also adopted a CIL charging mechanism. However this site is included as a 'large allocated site' and therefore attracts a nil CIL charge.

Summary

84 In summary, the applicant should provide further information on its impact assessment, and submit evidence that all modelling outputs provided have been validated in accordance with TfL's guidelines. This will assist in informing TfL's response on the proposed car parking, and also the extent of mitigation required. The access to the proposed cycle parking can be improved, and the applicant should demonstrate the impact of the proposed zebra crossing on bus reliability along Westferry Road. Finally, conditions should be attached to any draft planning consent securing a car parking management plan; delivery and servicing plan; construction logistics plan, and water freight feasibility study, in addition to travel plans to be secured within the section 106 agreement.

Local planning authority's position

85 The Council has yet to consider a report on this application at its planning committee.

Legal considerations

86 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 (the next bit is optional) 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

87 There are no financial considerations at this stage.

Conclusion

88 London Plan policies on Opportunity Areas, housing, urban design, inclusive design, climate change, and transport are relevant to this application. The principle of the housing-led mixed-use redevelopment of this site, including provision of public open space and education facilities, is strongly supported. However, a number of strategic concerns are raised, and consequently the application does not accord with London Plan Policy. The following could address these deficiencies:

- **Housing:** it is not possible at this stage to determine whether the proposal provides the maximum reasonable amount of affordable housing, in accordance with London Plan Policy 3.12. The proposed tenure split does not accord with London Plan Policy 3.11; amendments subsequently proposed by the applicant would address this concern.
- **Urban design:** it is not possible at this stage to determine whether the proposal accords with the standards and proposed standards set out in Annex 1 of the draft interim Housing SPG and Mayor's Housing Standards Policy Transition Statement.
- **Flood risk:** the application does not accord with London Plan Policy 5.13. The applicant should further reduce surface water run-off to the combined sewer, and revise its approach, increasing sustainable drainage techniques and use of direct discharge to the dock.
- **Climate change mitigation:** the energy strategy does not accord with London Plan policies 5.2, 5.6 and 5.9. Further information regarding energy efficiency, overheating, connection to the Barkentine heat network, and the site-wide heat network is required, with a view to increasing the carbon dioxide emission savings. The final agreed energy strategy should be appropriately secured by the Council.
- **Transport:** the proposal does not accord with London Plan policies 6.1, 6.2, 6.4, 6.7, 6.9 and 6.10. The applicant should provide further information on its impact assessment, and submit evidence that all modelling outputs provided have been validated in accordance with TfL's guidelines. This will assist in informing TfL's response on the proposed car parking, and also the extent of mitigation required. The access to the proposed cycle parking can be improved, and the applicant should demonstrate the impact of the proposed zebra crossing on bus reliability along Westferry Road. Finally, conditions should be attached to any draft planning consent securing a car parking management plan; delivery and servicing plan; construction logistics plan, and water freight feasibility study, in addition to travel plans to be secured within the section 106 agreement.

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

Colin Wilson, Senior Manager – Development & Projects

020 7983 4783 email colin.wilson@london.gov.uk

Justin Carr, Strategic Planning Manager (Development Decisions)

020 7983 4895 email justin.carr@london.gov.uk

Sarah Considine, Principal Strategic Planner, case officer

020 7983 5751 email sarah.considine@london.gov.uk
