

18 February 2016

100 Liverpool Street & 8-12 Broadgate, London

in the City of London

planning application no. 14/01285/FULEIA

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

Refurbishment and extension of existing building to provide a ten storey office-led mixed use development over 13 floors with predominantly commercial office (B1) use with some flexible retail and/or leisure uses (A1/A2/A3/D2) at lower ground, ground and first floor levels; car and cycle parking hard and soft landscaping; alterations to facilities associated with the bus station; and the provision of other works ancillary to the main building.

The applicant

The applicant is **Bluebutton Properties UK Limited** and the agent is **DP9 Limited**. The architect is **Hopkins Architects**.

Strategic issues

The principle of the office redevelopment is supported. However, there are a number of outstanding strategic planning issues relating to the **principle of development, climate change** and **transport** that should be resolved before the application is referred back to the Mayor.

Recommendation

That the City of London Corporation be advised that while the application is generally acceptable in strategic planning terms the application does not comply with the London Plan, for the reasons set out in paragraph 72 of this report; but that the possible remedies set out in the same paragraph could address these deficiencies. The application does not need to be referred back to the Mayor if the Corporation resolves to refuse permission, but it must be referred back if the Council resolves to grant permission.

Context

1 On 12 January 2016 the Mayor of London received documents from the City of London Corporation 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 22 February 2016 to provide the City Corporation with a statement setting out whether he considers that the application complies with the London Plan,

and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under Category 4 of the Schedule to the Order 2008:

Development in respect of which the local planning authority is required to consult the Mayor by virtue of a direction given by the Secretary of State under article 10(3) of the GDPO: Strategic Views.

3 Once the City Corporation 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 or allow the Council to determine it itself, unless otherwise advised. In this instance if the Council resolves to refuse permission it need not refer the application back to the Mayor.

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 0.89 hectare application site is part of the Broadgate Estate and lies immediately to the west of London Liverpool Street station. The site is bounded to the south by Liverpool Street, to the west by Eldon Street and Broadgate Circle, to the north by the nearly completed 5 Broadgate development, and to the east by Sun Street Passage and Liverpool Street bus station, the western part of which is within the red line boundary of the application.

7 The site comprises two 7 storey buildings, known as 100 Liverpool Street and 8 -12 Broadgate, which were built in the 1980's and designed as separate offices with individual entrances accessed both off Liverpool Street and Broadgate Circle. The buildings were later amalgamated to operate as a single building that is now occupied by UBS Ltd.

8 There are some retail uses at lower ground floor level and the Octagon Mall cuts through the middle of 100 Liverpool Street and forms a key link between Broadgate and London Liverpool Street station. A large portion of the retail use at the lower ground floor of 8 -12 Broadgate is owned by Network Rail, as is a large part of the ground and first floor levels that is also leased to London Bus Services Limited for use as part of the bus station for Liverpool Street station. These Network Rail owned areas cover at least two thirds of the footprint of the office building above.

9 The application site lies within the Central Activities Zone (CAZ) as identified in the London Plan and Liverpool Street is designated in the London Plan as a CAZ frontage with the Liverpool Street and Octagon Mall area designated in the City's Local Plan as one of the City's five Principal Shopping Centres (PSC).

10 The application site is not within a conservation area but a number of conservation areas are located in the vicinity. The site also partially lies in the background of Protected View 9A.1 of the Mayor's London View Management Framework (LVMF).

11 The site is highly accessible by public transport, being immediately adjacent to Liverpool Street station where national rail, London overground and underground services on the Central, Metropolitan, Circle and Hammersmith & City lines can be accessed, as well as 17 bus routes. Docklands Light Railway and Waterloo & City line services are within walking distance at Bank

station, as are Northern line services and additional national rail services and bus routes at Moorgate station. From 2018, Crossrail services will also stop at Liverpool Street, with an entrance into the Crossrail station being located immediately south of the site on Liverpool Street itself. As such, the site records the highest possible Public Transport Accessibility Level (PTAL) of 6b. The nearest cycle hire docking station is approximately 250 metres away to the south.

Details of the proposal

12 The proposal seeks to refurbish and extend the existing building, including the retention of the building's structural frame, the construction of a new facade and the provision of three additional floors and rooftop plant to provide a ten storey office-led mixed use development over 13 floors with commercial office (B1) floorspace, and commercial floorspace, comprising retail (A1), flexible retail (A1-A3), flexible retail (A1-A3)/office (B1), and flexible retail (A1-A3)/leisure (D2) uses at lower ground, ground and first floor levels; along with flexible office (B1)/restaurant (A3) use at ninth floor. The existing and proposed floorspace by use (GIA) is as follows:

	Existing sq.m. (GIA)	Proposed sq.m. (GIA)
Office (B1)	47,390	52,852
Retail (A1)		4,227
Retail (A1/A2/A3)	603	1,771
Office (B1)/Retail (A3)		1,616
Office (B1)/Retail (A1/A2/A3)		72
Retail (A1/A2/A3) or leisure (D2)		1,110
Plant/BOH/storage		6,001
Total	48,843	67,649

(Source: Dp9)

13 The application also includes the provision of car and cycle parking, alterations to the facilities associated with the bus station, hard and soft landscaping, roof terraces and other associated works.

14 The final development is expected to accommodate a minimum of 5,442 employees compared to 3,300 on the existing site (an increase of 61%)

Case history

15 The submission of this application follows a previous application (LPA reference: 14/01285/FULEIA and GLA reference: D&P/3489/01) which was submitted to the City of London Corporation in December 2014, and considered acceptable by the Mayor in 2015. It was recently granted permission by the City Corporation on 28 January 2016. It proposed 64,484 sq.m. office (B1) space, 12,674 sq.m. retail (A1-A3), and 1,371 leisure space 52(GIA).

16 The applicant has undertaken a review of the mix of uses within the approved scheme and is now seeking to increase the retail (class A1-A3) offer at lower ground, ground and first floor levels by 2,147 sq.m. (GEA). The office floorspace (B1) (including plant and storage) will be reduced by a maximum of 1,421 sq.m. (GEA). An uplift of 8,898 sq.m. (GEA) in office floorspace is provided in comparison with the existing building.

Strategic planning issues and relevant policies and guidance

17 The relevant issues and corresponding policies are as follows:

- Central Activities Zone *London Plan*
- Offices *London Plan*
- Mix of uses *London Plan*
- Urban design *London Plan; Shaping Neighbourhoods: Character and Context SPG*
- Strategic views *London Plan; London View Management Framework SPG*
- Inclusive access *London Plan; Accessible London: Achieving an inclusive environment SPG*
- Sustainable development *London Plan; Sustainable Design and Construction SPG*
- Transport and parking *London Plan; the Mayor's Transport Strategy*
- Crossrail *London Plan; Mayoral Community Infrastructure Levy and Crossrail SPG.*

18 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 City of London Local Plan 2015 and the 2015 London Plan (consolidated with Alterations since 2011).

19 The following are also relevant material considerations:

- The National Planning Policy Framework and National Planning Policy Guidance
- Minor Alterations to the London Plan: Housing Standards and Parking Standards (Draft 2015)
- The City of London Planning Obligations SPD (April 2014)
- The City of London Office Use SPD (January 2015)

Principle of development

Office redevelopment in the Central Activities Zone (CAZ)

20 As set out in paragraph 8, the application site lies within the Central Activities Zone as identified in the London Plan. London Plan Policy 2.11 establishes the strategic functions of the CAZ and supports office and mixed use development in the area. London Plan Policy 4.2, in particular, gives strategic support to renewal and modernisation of existing office stock in viable locations with good public transport accessibility.

21 The proposed development seeks to achieve a comprehensive refurbishment and modernisation of the office space at the site, which was supported previously. As noted, this scheme sees a reduction of the amount of office floorspace in comparison with the consented scheme but represents an uplift of 9,763 sq.m. (GIA) of office floorspace compared to the existing building. Should the applicant use the areas flexible commercial use for office use, the office

accommodation would increase to a maximum of 59,845 sq.m. (GIA), representing an uplift of 11,613 sq.m. (GIA) compared to existing (or 23.3%).

22 As agreed previously, this significant increase in both the amount and quality of office accommodation within the Broadgate Estate will support London's function as one of the world's most attractive and competitive business locations and is supported in accordance with London Plan Policies 2.11 and 4.2. The reduction in floor space compared to previously approved scheme is acceptable.

Mix of uses, including housing

23 London Plan Policy 4.3 promotes mixed use development, including housing, to support increases in office floorspace. The policy also states that, where an increase in office floorspace is proposed and where this increase is above a justified local threshold, as a general principal, applicants should be required to provide housing and other uses on-site or nearby to create mixed use neighbourhoods. Within the CAZ and the City of London, the London Plan approach allows for a degree of flexibility with respect to the provision of mixed uses and provision of housing and exempts the City from providing mixed uses on-site, if it compromises broader objectives such as sustaining important clusters of business activity. Under such circumstances, contributions to off-site housing provision are sought as part of the planning agreement. At the local level, the City of London in its Planning Obligations Supplementary Planning Document (SPD) advises that where there is a net increase of 500 sq.m. (GIA) or more of commercial floorspace, a financial contribution towards off-site provision of affordable housing should be sought.

24 Based on the characteristics of the proposed scheme, the absence of housing on-site is accepted on the basis of the broader principle of sustaining the important cluster of business activity in the City. However, and as per the consented application, a suitable financial contribution for the provision of off-site housing is expected.

25 The applicant has advised that the Council's draft section 106 Heads of Terms which accompany the current application identify that a contribution of £376,120 would be due in line with the SPD. The City of London Corporation should confirm that this has been secured.

Retail and leisure floorspace

26 London Plan Policies 2.11 and 4.7 support the enhancement and expansion of retail capacity in the CAZ frontage and the City of London's Local Plan Policies Map identifies Liverpool Street and Octagon Mall as Principal Shopping Centres (PSC) where new retail development should be focused.

27 The application seeks to increase the amount of retail floorspace on site compared to the extant and proposes to include flexible retail and leisure uses (Class A1/A2/A3/D2) of approximately 7,933 sq.m. (GIA) at lower ground, ground and first floor levels. The new retail units will be provided to the north and south of the western end of Octagon Mall, as well as along the eastern edge of Broadgate Circle. In addition, the application also seeks approval for part (1,616 sq.m.) of the ninth floor to have flexibility for either office (B1) or restaurant use (A3) use.

28 As the new retail and leisure floorspace will lie in the CAZ frontage and will offer active linkages between Octagon Mall, Liverpool Street station and the wider Shopping Centre, as per the previous application, the proposed town centre uses do not raise any strategic issues and are acceptable.

Summary

29 GLA officers support the principle of the redevelopment of the site and the mix of uses proposed, subject to the Council confirming that a suitable financial contribution for off-site affordable housing has been secured.

Urban design

30 As previously agreed, GLA officers support the applicant's building design, and its scale and massing, materials and appearance do not raise any strategic issues.

31 GLA officers welcome the applicant's revised plans and the introduction of new retail units at ground level, which help animate and activate the building's frontages. However, whilst the new layout presents an opportunity to better link the bus station with the development and helps activate the southern end of the route through to Sun Street Passage, the direct link is interrupted and pedestrian movements from the bus station to the new retail units are being restricted. Whilst it is understood that the applicant has discussed the issue with Transport for London, and that the creation of a safe crossing at ground level through the bus station would not be safe, GLA officers are disappointed that the design of the proposed scheme, and of the bus station, are not better coordinated.

Strategic views

32 As mentioned in paragraph 9, the application site is partially located within the background of the Protected Vista from King Henry's VIII's Mound, Richmond to St Paul's Cathedral (LVMF view 9A.1). As submitted for the previous application, the applicant has provided a full visual impact assessment to depict the degree to which the proposed development would be visible in the view.

33 As before, the photographs submitted by the applicant and the outline of the proposed development against the view show that a small section of the scheme would exceed the threshold plane of the Protected Vista and would therefore have some visual presence in the background of the Protected Vista.

34 However, as the height and mass of the proposed building has not changed from previous, and as the proposed development will preserve the viewer's ability to recognise and appreciate the dome of the Cathedral from King Henry VIII's Mound, as required in the guidance within the Mayor's London View Management Framework SPG, the impact on the view remains acceptable.

35 As required for the previous application, the applicant has also assessed the impact of the proposed development on the composition of the view in the downstream River Prospect from Waterloo Bridge (LVMF 15B.1). As before, the verified views submitted with the application confirm that the proposal would have no visual impact on LVMF 15B.1.

36 Based on the above and in line with London Plan Policy 7.12, GLA officers remain satisfied with the proposal in terms of impact on the strategic views.

Inclusive Design

37 The Design and Access Statement includes measures which demonstrate that office entrances, circulation, signage and sanitary accommodation have been thought through to improve access for disabled office/retail users and visitors within the building. As for the consented application, these measures should be secured by condition.

38 The Planning Statement advises that the development will maintain the existing exterior levels, except on Liverpool Street where it is proposed that the levels to be adapted in order to integrate with improvements associated in front of the site. The submitted drawings show that the existing steps around the building on the exterior of 100 Liverpool Street have been partially removed and that level access to the main office entrance has been provided. Whilst it is understood that the detailed design of the public realm along Liverpool Street will be subject to further approval between the applicant, the City Corporation and Crossrail, the removal of the steps to create a more inclusive environment outside 100 Liverpool Street and the future Crossrail station would be very welcomed by the GLA. In accordance with London Plan Policy 7.2, the proposal broadly responds to the principles of inclusive design.

Climate change adaptation

39 The surface water drainage assessment proposes a 50% reduction in peak runoff (+30% climate change), i.e. a discharge rate of 198.75 l/s. This would be achieved primarily through below-ground attenuation tanks, the volume of which will be determined at the detailed design stage. In addition, green roofs, a rainwater harvesting system (providing approximately 120m³ of storage) and a grey water system will also reduce runoff.

40 Whilst this approach is in principle acceptable in terms of London Plan Policy 5.13, the detailed design of the attenuation tanks needs to consider the guidance provided in Susdrain's factsheet on attenuation storage for redeveloped sites (see link http://www.susdrain.org/files/resources/fact_sheets/01_15_fact_sheet_attenuation_for_redeveloped.pdf). Method 2 (i.e. with an overflow into the drainage system for runoff in excess of the storage volume) should be utilised to allow for longer retention for lower return period storms. The applicant should confirm this approach prior to any stage 2 referral to the Mayor.

41 In accordance with London Plan policy on climate change, the applicant's commitment to incorporate water efficiency measures, green roof solutions and ecological enhancement measures which promote urban greening in the CAZ and biodiversity should be secured by condition.

Climate change mitigation

Energy efficiency standards

42 The applicant should confirm the energy efficiency measures that will be adopted for the development. Evidence on how the demand for cooling will be minimised through passive design in line with Policy 5.9 should also be provided.

43 The development is estimated to achieve a reduction of 84 tonnes per annum (18%) in regulated CO₂ emissions compared to a 2013 Building Regulations compliant development. It is noted that the carbon emission savings reported for the application are identical to the previous application. The applicant should therefore provide further details on any changes to the scheme since the previous application which impact on the energy performance of the scheme, including changes in building uses/area and envelope. Any significant changes since the previous

application to the building design should be reflected in the energy modelling and the carbon emission figures.

44 The applicant should provide BRUKL worksheets for the development (including efficiency measures alone) to support the savings claimed.

District heating

45 The applicant has identified that the Citigen heat network is in the vicinity of the development. The applicant has stated that extension has been discussed with the network operator, however, connection has been considered unviable.

46 The applicant has also stated that the network operator is also working with another developer to develop a new district energy system, which would be in the vicinity of the development. A non-binding letter of intent to supply the development has been signed between the applicant and the network operator. However, the delivery of the heat network is expected after completion of the proposed development and the applicant is proposing to provide a standalone heating and cooling solution. The applicant has, however, provided a commitment to ensuring that the development is designed to allow for future connection to a district heating network and will connect to the proposed heat network subject to reasonable economic constraints. The applicant should provide evidence of recent correspondence with the network operator, including anticipated timescales in relation to the development completion date and the letter of intent. The applicant should also provide further detail on the connection feasibility studies mentioned in the energy report.

47 The applicant is currently proposing to install a site heat network. However, the applicant should confirm that all building uses will be connected to the site heat network.

Combined Heat and Power

48 The applicant has investigated the feasibility of CHP. However, due the intermittent nature of the heat load, CHP is not proposed. This is accepted in this instance.

Renewable energy technologies

49 The applicant has investigated the feasibility of a range of renewable energy technologies and is proposing to install 450 sq.m. of Photovoltaic (PV) panels on the roof of the building. The applicant has determined that this is the maximum available PV array due to plant and neighbouring buildings and has carried out an analysis to determine the PV output. A roof layout has been included detailing the proposed PV arrangement. This is acceptable.

Summary

50 A reduction of 112 tonnes of CO₂ per year in regulated emissions compared to a 2013 Building Regulations compliant development is expected, equivalent to an overall saving of 24%.

51 The on-site carbon dioxide savings fall short of the targets within Policy 5.2 of the London Plan. While it is accepted that there is little further potential for carbon dioxide reductions on-site, in liaison with the Council, the applicant should ensure the short fall in carbon dioxide reductions, equivalent to 50 tonnes of CO₂ per annum, is met off-site.

Transport

Access

52 Access for cars and service vehicles remains unchanged, with vehicles accessing from the north via Broad Lane. Whilst the previous permission relocated cycle access to Sun Street Passage, this scheme proposes the reuse of the existing access point. However, cyclists would only share the ramped section of the basement access lane, and would not come into conflict with reversing service vehicles. TfL would expect to see sufficient safeguards and details set out in regard to control over conflicts between cyclists crossing the service vehicle lane at the end of the ramp, where visibility between exiting vehicles and arriving cyclists is inadequate.

53 Pedestrian access will be from Liverpool Street, Broadgate Circle and through Liverpool Street Station at (lower) concourse level, with no general pedestrian access into the bus station area (though revisions have been discussed to allow a ground level pedestrian exit in the area of the southern entrance point to the adjacent bus station).

54 A condition will again be secured requiring TfL to be consulted on the detailed design of the interface and operation of the area between the development and the bus station, where fire exits are again proposed. This should be formalised within a Building Evacuation Strategy as part of a Memorandum of Understanding.

55 As before, relocated and improved bus driver and passenger information facilities are proposed, which reflect the evolution of proposals within the extant permission. Conditions requiring detailed design of the toilets and office space to be agreed prior to commencement will be required for this application should permission be granted for this scheme.

Car & cycle parking

56 As before, car parking is proposed to reduce from 33 spaces provided at present to two blue badge spaces. This is supported by TfL.

57 Cycle parking levels have been determined in line with the extant consent, and short stay spaces are again not proposed. The approach to identifying the number of spaces required is noted to be incorrect, in that plant and servicing GEA floorspace has been excluded from floorspace totals allocated to the office and retail uses proposed, despite all such floorspace clearly coming within the remit of Gross External Area. This has had the effect of significantly underestimating the level of cycle parking required, and thus the development would not accord with Policy 6.13 of the London Plan. However, given the minimal difference between the current scheme and the very recently approved permission, and as both relate to a refurbishment and extension of a building as opposed to a new build scheme, the deficiency is not considered to be objectionable. On this basis, between 633 and 642 long stay cycle spaces will be provided, dependant upon the maximum levels of office or retail floorspace to be implemented.

58 The previously application proposed equivalent proportions of different types of spaces (stacking, Sheffield and folding), although this arrangement is not strictly accordant with policy or the London Cycle Design Standards. As noted previously, TfL would want to avoid setting a precedent on cycle parking type for future applications and as such it is requested that the use of lockers for folding cycles versus more traditional cycle parking is monitored specifically through the Travel Plan and that this data is subsequently shared to help inform future cycle parking guidance. The ratio of cycle spaces to lockers and showers is again considered to be acceptable.

Impact on public transport

59 An entrance to Liverpool Street Crossrail station will be located immediately to the south of the proposed development on Liverpool Street. The applicant is in discussions with Crossrail and the City in relation to the final design of the public realm in this location and there are also ongoing discussions between TfL and the City over the final designs. Although the design for Liverpool Street is yet to be finalised, it would be useful to quantify the amount of footway space that is required to accommodate station flows, background demand and demand associated with this development to help inform any designs that may be produced. The proposals to remove the steps outside the existing building wherever possible in order to maximise available footway space are nonetheless welcomed, although it is acknowledged that some will need to remain due to issues with levels.

60 Although the development will generate a number of trips across the various public transport modes, TfL does not consider that any specific public transport mitigation will be required, beyond the Crossrail contribution referred to below.

61 The development would lead to an increased demand for use of taxis. TfL will expect that the development does not adversely impact upon the operation of or access to local taxi ranks, the most significant of which lies a short distance to the east on Liverpool Street.

62 A framework Travel Plan has been submitted with the application and is of a good quality. This Travel Plan should be secured through the Section 106 agreement for the site.

Servicing & construction impact & management

63 A delivery and servicing plan has been submitted and should be secured by condition so that a more detailed plan can be approved once the mix of uses and occupiers are known. The commitment to targets and monitoring of the plan is welcomed. The approach to retail unit servicing is unclear from the different supporting documents. This should be clarified prior to reference back to the Mayor at stage 2, as on street servicing from Liverpool Street (as suggested within the Planning Statement) may not prove to be practicable, given the potential impact of public realm proposals including the availability of loading bays in the vicinity of the site following the opening of Crossrail.

64 A framework construction logistics plan (CLP) has been submitted as part of the application and sets out the principles of the construction methodology. Whilst this is welcomed and contains a number of measures that are seen as being positive, it is relatively generic at this stage. As such, a condition requiring a detailed CLP to be submitted and agreed by the City, Crossrail and TfL prior to any works on site should be submitted. Discussions regarding temporary construction impacts upon the bus station are ongoing, including the need for any closures. The applicant will be expected to enter into a separate property agreement with London Buses to ensure that construction is managed appropriately. Suitable conditions will also need to be placed on any consent to protect London Underground infrastructure within and around the site.

Section 106 and Community Infrastructure Levy

65 The City of London adopted its Community Infrastructure Levy (CIL) charging schedule in July 2014. A full charging schedule is available from the council, but both office and retail uses are charged at £75 per square metre. The Regulation 123 list identifies that this levy can be spent on 'transport improvements'.

66 In addition, in accordance with London Plan policy 8.3 the Mayor commenced CIL charging for developments on 1st April 2012. Within the City of London, the charge is £50 per square metre. The site is also in the area where section 106 contributions for Crossrail will be sought in accordance with London Plan Policy 6.5 and the associated Supplementary Planning Guidance (SPG) 'Use of planning obligations in the funding of Crossrail' (April 2013). In these situations, the Mayoral CIL will be treated as a credit towards the section 106 Crossrail liability and this should be reflected in the wording of the section 106 agreement.

67 TfL are currently unable to determine the maximum level of Crossrail s106 charge that will be required, as 6,001 sq.m. of floorspace (GIA) has not been allocated to a specific chargeable use. This space should be apportioned to office / retail use in the appropriate proportions, and the rationale for that apportionment set out clearly. The section 106 agreement will need to take account of the flexible nature of some of the floorspace proposed.

Local planning authority's position

68 The City of London Corporation granted permission for the previous application in January 2016. The City of London Corporation still has to determine this application.

Legal considerations

69 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 Corporation 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 Corporation 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.

70 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

71 There are no financial considerations at this stage.

Conclusion

72 London Plan policies on the principle of development, urban and inclusive design, climate change and transport are relevant to this application. Whilst the application is supported in principle, there are outstanding strategic planning issues that will need to be resolved before the application is referred back at stage 2. Further discussion is required regarding the following issues:

- **Principle of development:** The principle of the office-led mixed use redevelopment of the site is supported. The Corporation should confirm that the financial contribution for off-site housing has been secured through the S106 in line with London Plan Policy 4.3 and local policy.

- **Climate change adaptation:** The proposed development is compliant with London Plan Policy 5.12. However, the sustainable drainage strategy should provide further information in relation to the attenuation tank design in order to comply with London Plan Policy 5.13. The applicant's proposed measures to contribute towards climate change adaptation should be secured by condition.
- **Climate change mitigation:** The proposed carbon dioxide savings fall short of the London Plan and the short fall in carbon dioxide reductions should be met off-site. Further information should be provided on district heating and on the site heat network before the proposals can be considered acceptable.
- **Transport:** The outstanding matters set out by Transport for London above need to be resolved in order to demonstrate full compliance with relevant London Plan policies.

For further information, contact GLA Planning Unit (Development & Projects Team):

Stewart Murray, Assistant Director – Planning

020 7983 4271 email stewart.murray@london.gov.uk

Colin Wilson, Senior Manager – Development & Projects

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

Samantha Wells, Principal Strategic Planner

020 7983 4266 email samantha.wells@london.gov.uk

Hermine Sanson, Senior Strategic Planner

020 7983 4290 email hermine.sanson@london.gov.uk
