

18 February 2016

Mahatma Gandhi House, Wembley

in the London Borough of Brent

planning application no.15/4714

Strategic planning application stage 1 referral

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

The proposal

Demolition of existing office building and redevelopment to the site to provide a part 10 and part 21 storey building from podium level with 1,546 sq.m. of A1 floorspace and 139 sq.m. of flexible A1, A2 and A3 floorspace on the ground floor and 202 residential units (use class C3) above with car parking, communal and private amenity space, public realm improvements, landscaping and other associated works.

The applicant

The applicant is **Red Vale Property Development Limited** and the agent is **Montagu Evans**.

Strategic issues

The key strategic issues with this proposal are the consideration of **affordable housing** provision and whether the **maximum reasonable amount** is being achieved at the site along with the number of **family units**, particularly within the affordable provision. Other policy areas which require consideration include: **design, inclusive access, play space, energy, drainage, and transport**.

Recommendation

That Brent Council be advised that while the application is generally acceptable in strategic planning terms the application does not comply with the London Plan, for the reasons set out in paragraph 70 of this report; but that the possible remedies set out in paragraph of this report could address these deficiencies.

Context

1 On 11 January 2016 the Mayor of London received documents from Brent 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 19 February 2016 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 Categories 1A, 1B and 1C 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— (c) outside Central London and with a total floorspace of more than 15,000 square metres.”

Category 1C

“Development which comprises or includes the erection of a building where - (c) the building is more than 30 metres high and is outside the City of London.”

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

Site description

5 The site lies within the boundaries defined in the Wembley Area Action Plan as the Wembley Regeneration Area. The Brent Site Specific Allocations Document also defines this area as the Wembley growth area. The site is 0.299 hectares and located immediately to the north of Wembley Stadium and the expanse of Station Square, on the corner of the junction of Wembley Hill Road and South Way. There is a 4 metre level change at ground floor level around the site. The site is an identified site within the Wembley Housing Zone.

6 The site is bound by mixed use development to the north and east, with South Way to the south and Wembley Hill Road to the west. The North Circular is the nearest section of Transport for London Road Network, accessed approximately 4km to the east of the site, whilst the Strategic Road Network can be accessed at Harrow Road, 280m to the south.

7 Wembley Stadium Station connects the site to Chiltern Main Line trains, approximately 50m south of the site, whilst Wembley Central Station, 1km west connects the site to London underground Bakerloo Line and London Overground lines.

8 The site is served by 8 bus services with the nearest stop located at Wembley Hill Road, Stop SB. Given the above, the site has a good public transport accessibility level (PTAL) rating of 4, where 6 is excellent and 1 is poor.

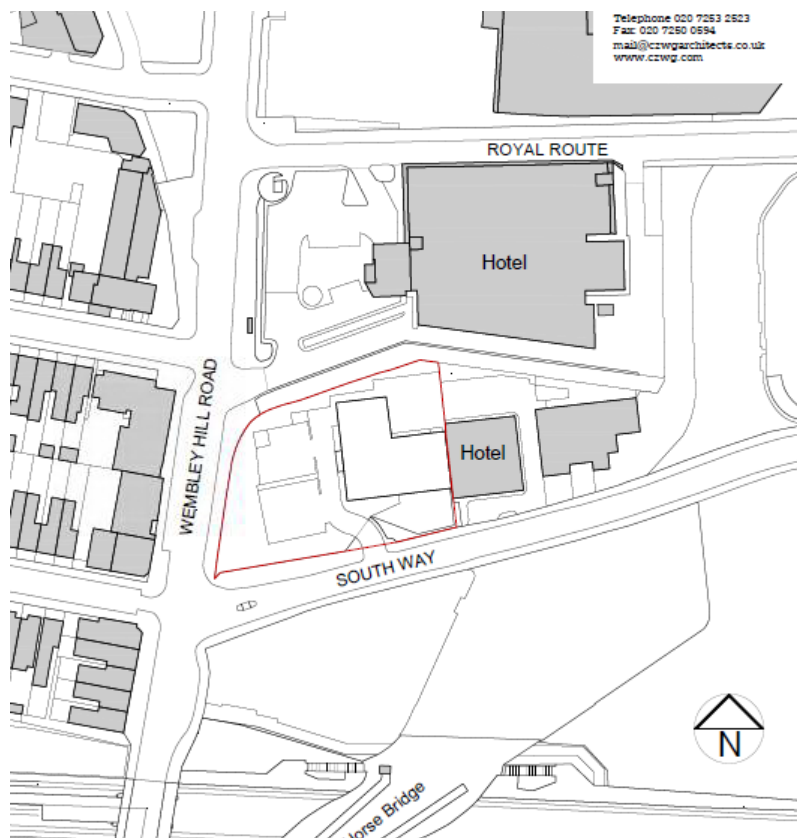
9 In terms of site designations and allocations afforded to this site, it is located within an Opportunity Area, Housing Zone, town centre and Wembley Growth Area boundary. It is also approximately 200 metres from Wembley National Stadium.

10 There is also a designated wildlife corridor to the south of the site which runs along the rail way line and Wembley Stadium station. Wembley Hill Conservation area is located to the north west of the site and is characterised by terraced and semi-detached properties, and the Green Man public house, however none of these properties are listed statutorily or within the Local List by Brent Council.

The proposal in the context of development on the surrounding area

11 A Quintain development planning application for the redevelopment of the South West Lands is also being considered by the Council for seven mixed use buildings up to 19 storeys, and comprising up to a total of 67,000 sq.m. of C3 floor space (725 residential units Council reference: 14/4931).

Site location plan



(Source: applicant's Planning Statement, prepared by Montagu Evans, October 2015)

Details of the proposal

12 The applicant seeks to demolish the existing office building and redevelop the site to provide a part 10 and part 21 storey building from podium level with 1,546 sq.m. of A1 floorspace on the ground floor fronting onto Wembley Hill Road and 139 sq.m. of flexible A1, A2 and A3 floorspace on the ground floor on South Way. Two hundred and two residential units (use class C3) will be provided from the first floor upwards. Forty car parking spaces, 323 cycle spaces, communal and private amenity space for all housing tenures, public realm improvements, landscaping and other associated works. The residential units overlooking South Way will also be supported by a communal gym, lounge and cinema.

13 The applicant refers to the 21 storey element of the proposal as the "East Building" and the 10 storey part is the "West Building".

Case history

14 The applicant met with GLA officers at a pre-application meeting on 28 July 2015 in City Hall. At that stage, the proposal description was: *“the redevelopment of the site to provide a residential-led mixed use development with retail floorspace on ground floor. 190 residential units are proposed, to be accommodated in two buildings on top of a garden podium.”*

15 At that stage, GLA officers advised the applicant that the principle of redevelopment of the site for mixed use development is supported by strategic planning policy. However, the applicant was advised to set out clearly the affordable housing provision and timing, noting the London Plan requirement for the maximum reasonable amount of affordable housing being secured.

16 The applicant was also informed that all affordable housing should be provided on site in the first instance and not through a donor site or payment in lieu. The applicant’s finalised approach and level of commitment to providing affordable housing should be justified through a viability assessment which should be independently reviewed on behalf of Brent Council and shared with GLA officers. Particular consideration was to be given to residential quality, the ground floor design and servicing strategy.

Strategic planning issues and relevant policies and guidance

17 The relevant issues and corresponding policies are as follows:

• Mix of uses	London Plan
• Regeneration	London Plan; the Mayor’s Economic Development Strategy
• Retail/town centre uses	London Plan
• Housing	London Plan; Housing SPG; Housing Strategy; draft Revised Housing Strategy; Shaping Neighbourhoods: Play and Informal Recreation SPG; draft Shaping Neighbourhoods: Character and Context SPG
• Affordable housing	London Plan; Housing SPG; Housing Strategy
• Density	London Plan; Housing SPG
• Urban design	London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG; London Housing Design Guide; Shaping Neighbourhoods: Play and Informal Recreation SPG;
• Access	London Plan; 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 and parking	London Plan; the Mayor’s Transport Strategy
• Crossrail	London Plan; Mayoral Community Infrastructure Levy; 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 Brent Local Plan Core Strategy and Development Management Policies (adopted September 2012) and the 2015 London Plan (Consolidated with Alterations since 2011).

19 The following are also relevant material considerations:

- Draft Minor Alterations to the London Plan (MALP) 2015;
- The National Planning Policy Framework and Technical Guide to the National Planning Policy Framework;
- Brent Council, Site Allocations DPD & Saved UDP Policies; and
- Wembley Area Action Plan (January, 2015).

Principle of development/mixed use

Residential use

20 This residential-led development proposes to deliver 202 residential units. This is supported by London Plan policy 3.3, which seeks to increase London's supply of housing and in doing so sets borough housing targets, of which Brent Council's is 1,525 homes per year between 2015/16-2024/25. The site's Housing Zone designation means that the proposal will also assist in the expansive and accelerated delivery of new homes, thereby meeting the purpose of Housing Zones.

Town centre uses

21 London Plan Policy 2.15 provides the strategic vision for town centres within London, and is supported by the Mayor's Town Centres Supplementary Planning Guidance. Development proposals are expected to sustain and enhance the vitality and viability of the centre, accommodate economic and housing growth through intensification, and contribute towards an enhanced environment. London Plan Policy 3.3 requires boroughs to enable development capacity to be brought forward to meet minimum housing targets through, amongst others, town centre renewal and intensification.

22 Paragraph 4.33 of the Wembley Core Strategy states: 'The Council's key spatial objectives include revitalising town centres and securing regenerative development in Wembley which is strategically important to London as a whole.' In this context, the provision of housing and commercial floorspace is supported and in accordance with strategic policies for town centres. As the site's location in the Wembley Town Centre boundary, and the Wembley AAP aims to extend the town centre towards the arena, this would be met via the proposal. The principle of flexible retail floorspace is supported by the development plan and strategically.

23 The Brent Council Wembley Area Action Plan (AAP) has been found to be in accordance with the London Plan by the Mayor and the principles and policies have been subject to a thorough evaluation in relation to the London Plan. The AAP provides key area specific material guidance, which the applicant should follow. The area covered by the AAP is identical to the 'Housing Zone' designation for Brent, which provides Brent Council with a clear policy position in regard to development in Wembley. It is apparent that the proposal and those coming forward within this area are steered towards meeting the Housing Zone proposals along with other policies tied to the very specific area designations stated in paragraph 9, that this site commands, which are therefore strategically supported.

Housing

Proposed residential mix

24 The application, in total proposes 202 residential units in the following mix of units.

Unit mix	private	intermediate	Social rent
Amount and percentage			
Studio	20 (12%)	0 (0%)	0 (0%)
1 bedroom	54 (33%)	5 (45%)	2 (8%)
2 bedroom	85 (52%)	5 (45%)	15 (58%)
3 bedroom	6 (4%)	1 (10%)	9 (35%)
Sub-total	165	11	26
TOTAL	202		

Tenure split and maximum reasonable amount of affordable housing

25 The scheme proposes 18% affordable housing by habitable room or 37 units out of the total 202 units. The 18% affordable housing contribution is to be split so as to provide 5% intermediate units and 13% social rented (or 28:72 proportionate split).

26 It is understood that the applicant has undertaken a viability assessment which is currently being independently assessed by the Council and the finding of which should be shared with GLA officers.

27 This will be required to verify that the maximum reasonable amount of affordable housing is being delivered at this site. The Council should seek to secure a higher proportion of affordable housing to meet local needs, and policy that is viable and in particular secure more affordable family units. Currently 8% of the total provision (16 units) and 5% (10 units) within the affordable provision are proposed to be family units. This provision is significantly lower than the local policy (WEM19) requirement, which seeks 25% 3 bed units or more within the affordable provision.

28 London Plan Policy 3.11 and the Mayor's Housing Supplementary Planning Guidance (SPG), requires 60% of overall housing provision to be social housing, and 40% for intermediate provision for the purposes of meeting affordable housing targets. Whilst the applicant's split proposes more social rented units, the Council may secure more should the overall provision of affordable housing be maximised, following the viability review.

29 Overall, subject to the matters raised above being resolved, the proposal for residential use at this site is supported as it will help to contribute towards the minimum borough target of 1,525 new homes that Brent Council is required to deliver annually.

Housing quality

30 London Plan Policy 3.5 promotes quality in new housing provision, with further guidance provided by the Mayor's Housing SPG. All of the units meet the Mayor's minimum space standards which is welcomed, and the number of dual aspect units have been maximised. Overall the quality of the residential units is high however reference should be made to the design section below.

Density

31 The applicant has indicated a density of 1,848 habitable rooms per hectare (hrha)/734 units taking into account, or excluding the non-residential uses proposed on the site to comply with the guidance set out in paragraph 1.3.47 on density calculations of the Housing SPG. This density exceeds the 650-1,100 hrha range specified within Policy 3.4 of the London Plan for a site within the 'central' setting with a PTAL of 4. However given the site's location within the Wembley Regeneration /OAPF Area this is supported, subject to the design being of high quality. As previously stated to the applicant at the pre-application meeting, high residential standards will need to be secured for this density to be deemed appropriate, particularly given the additional Housing Zone designation of the site. The design section of this report addresses concerns with these elements.

Children's play space/amenity space provision

32 The child yield calculated by the applicant on the basis of housing mix and tenure in accordance with policy 3.6 of the London Plan is expected to create a child yield of 46 children – 23 under 5s, 14 children between 5-11 and 9 children at 12 years plus. This would require the development to deliver 460 sq.m. of children's playspace. The proposal provides for 495sq.m. of playspace which exceeds the requirement. This is supported, however some mitigation will be required to overcome the microclimatic impacts of these communal play areas to ensure that they are actually useable. This is also important in light of the fact that the applicant states that 32 units across the whole scheme do not have private balconies and although these units (bar five studios) have larger internal floor areas to compensate for this loss, they have the communal podiums available to them. However, the applicant should ensure that these would be accessible and user friendly podium spaces to residents.

Urban design

33 The applicant has not addressed the issues raised at the pre-application meeting concerning the utilisation of the eastern corner of the site to enable greater active frontage to be achieved in its revisions. While GLA officers accept the spatial constraint and gradient difficulties that this site presents, officers would require further clarification as to why this cannot be achieved as this would maximise the active frontage and optimise the quality of urban realm along South Way by limiting the impact that the current refuse and servicing vehicles accessing the building would have.

34 The landscaping proposals along South Way are welcomed however officers require clarification as to whether the delineation of vehicles and pedestrians has been achieved through the landscaping strategy in terms of the positioning of the proposed tree planting and street furniture. GLA officers are aware that Brent Council also have concerns about the public realm along South Way. The delivery servicing plan indicates that two retail deliveries will take place a day and this together with the bins being put on the pavement for collection will affect the public realm. Further, a wider context plan of how the Station Square can be integrated with the public realm proposals still needs to be addressed as per the pre-application meeting advice.

35 It has been noted in the revised plans that a north west entry has been created to access both residential cores via the podium level, which is supported and will help to activate this edge of the site. The applicant should clarify whether the rest of this elevation may be opened up in the future, noting that this land is currently a private access link to the adjoining hotel.

36 Units without the provision of private balconies appear to be larger than the others on plan to compensate for the loss of private amenity; however this needs to be clarified by the applicant and for private amenity space to be factored in.

37 The applicant should clarify the impact of the likely canyoning effect of the taller tower on the amenity space/podium deck. Whilst officers note the south facing aspect, the tower may create micro-climatic issues for prospective residents which would detract from the usability of this space. The micro-climate assessment indicates that the roof terrace will potentially be very windy and therefore not very usable. The applicant should address this issue before this scheme is reported back at stage 2.

Residential standards

38 The residential quality is supported as the blocks are orientated to optimise east/west aspects to all units, while also allowing for good levels of south facing sunlight penetration into the communal courtyard area at podium level. This approach is welcomed and cores are located so as to be legible from the public realm while resulting in efficient core to unit ratios and providing direct access to the amenity deck. The applicant should confirm that the units are all designed to maximise average daylight factor (ADF) levels within the development.

39 As stated at the pre-application meeting, the massing configuration sits comfortably within the scale of emerging cluster of development around the periphery of Wembley Stadium and does not appear to impact on strategic views of the Wembley arch. Notwithstanding this, in order to fully justify the inclusion of tall buildings in this location, the applicant was advised to demonstrate an exemplary standard of design, place making and architecture on submission. Strategically officers are broadly supportive of the architectural response as per the previous advice report, however, to address London Plan policy 7.7, the applicant should (in addition to the concerns raised about the ground floor entrance/servicing/refuse area) explore means of improving the definition of the tower's roof line as it currently appears poorly resolved.

40 The council should work with the applicant to secure key details including balcony treatments, and facing materials together with the matters raised above.

Inclusive access

Wheelchair accessible/easily adaptable units

41 The applicant proposes that 21 of the 202 units (10%) will be wheelchair accessible and that these will be dispersed throughout the development between the market and affordable units. The location of these should be indicated on plan within the various tenures and mixes specified to ensure that the scheme is designed to meet the highest standard of accessibility and inclusion.

42 As of 1 October 2015 the Government's technical housing standards came into effect. The Mayor intends to adopt the new technical guidance through a minor alteration to the London Plan. In advance of this the Mayor has released a policy statement setting out that from 1 October 2015 the relevant London Plan policy and associated guidance in the Housing SPG should be interpreted by reference to the nearest equivalent new national technical standard. As such the Council will be asked to include a condition to secure the Building Regulation standards M4(2) and M4(3).

43 Compliance with these standards should be demonstrated on plan, using a sample of flat layouts, as part of the design and access statement submitted with any future planning application. The applicant should refer to the quality and design standards set out in the Mayor's Housing Supplementary Planning Guidance, and ensure that the wheelchair accessible units meet the best practice guidance set out in Annex Two of the SPG.

Commercial/retail uses

44 Extending exclusive design principles to the neighbourhood level, as well as the design of the landscaping and the public realm, can help to ensure that the public realm, the parking areas, the routes to the site, and links to adjacent public transport and local services and facilities are accessible, safe and convenient for everyone, particularly disabled and older people. In this regard, although the design and access statement indicates the applicant's inclusive design aims, the applicant will need to demonstrate through detailed drawings/layouts of how the pedestrian routes around the buildings are designed to ensure full and easy access for all users (level approaches from the kerb-side drop-, drop off /servicing points to the main doors, lifts, toilet cubicles etc.); and clarify how inclusive access to private and public amenity space will be achieved.

45 In reviewing the scheme's layout, the architects agreed to pay consideration to the location of parking bays for disabled people to be located close to the cores, and in considering the general levelling of the site in terms of accessibility to roof terraces etc. The applicant should address the inclusive access issues raised above to ensure that the scheme is fully inclusive to the needs of all residents and users of public space.

Energy

46 In terms of passive design features and demand reduction, measures are proposed to reduce the carbon emissions of the proposed development. Both air permeability and heat loss parameters will be improved beyond the minimum backstop values required by building regulations. Other features include low energy lighting. The demand for cooling will be minimised through shading from overhangs and balconies, and solar control glazing.

47 The development is estimated to achieve a reduction of 39 tonnes per annum (16%) in regulated CO2 emissions compared to a 2013 Building Regulations compliant development. BRUKL sheets for the non-domestic units for efficiency measures alone (i.e. before combined heat and power (CHP) should be provided to support the savings claimed.

48 In terms of district heating, the applicant has identified that the scheme is within the Wembley district heating network. The applicant has contacted the local borough energy officer discuss who has confirmed that a heat network is not likely to be developed near the site in the near future. Evidence of correspondence has been provided. The applicant should, however, provide a commitment to ensuring that the development is designed to allow future connection to a district heating network should one become available.

49 The applicant is proposing to install a communal heat network, and has confirmed that all apartments and non-domestic building uses will be connected.

50 The applicant should confirm that the communal heat network will be supplied from a single energy centre. Further information on the floor area and location of the energy centre should also be provided.

51 In terms of CHP, the applicant is proposing to install three 20 kWe gas fired CHP units as the lead heat source for the site heat network. The CHP is sized to provide the domestic hot water load, as well as a proportion of the space heating (84% of the total heat load). A reduction in regulated CO2 emissions of 77 tonnes per annum (30%) will be achieved through this second part of the energy hierarchy.

52 The applicant has provided a cost assessment of the CHP. However, the applicant should also provide information on the management arrangements proposed for the system given that the management and operation of small CHP systems can significantly impact their long term financial viability.

53 The applicant has investigated the feasibility of a range of renewable energy technologies but is not proposing to install any renewable energy technology for the development as the emission target is met by energy efficiency measures and CHP. However, the applicant has identified that PV is suitable and its inclusion would be welcomed.

54 Overall, based on the energy assessment submitted at stage I, a reduction of 116 tonnes of CO₂ per year in regulated emissions compared to a 2013 Building Regulations compliant development is expected, equivalent to an overall saving of 46%. The carbon dioxide savings exceed the target set within Policy 5.2 of the London Plan. However, the comments above should be addressed before compliance with London Plan energy policy can be verified.

Sustainable drainage/flood risk

55 The Flood Risk Assessment (FRA) and Drainage Strategy prepared by Parmarbrook confirms that the <1ha site is located within Flood Zone 1 and is at low risk of significant surface water flooding (though the adjacent South Way is at risk of significant surface water flooding). Whilst the proposed development complies with London Plan policy 5.12 (flood risk), the applicant's approach to sustainable drainage does not comply with London Plan policy 5.13.

56 The development proposals represent an increase in impermeable area from 76% to effectively 100%. The FRA & Drainage Strategy suggests that the surface water discharge from site will be restricted to 50% of the pre-development discharge rate, i.e. 26l/s, with the proposed surface water drainage network designed to cater for the 1 in 100 year storm event plus 30%. However, Thames Water has stated that there are known capacity issues in this network and that any new connection would need to be limited to 5l/s.

57 The FRA & Drainage Strategy proposes green roofs on the podium. However, no further information is provided to determine how the surface water discharge rate will be reduced. Given that neither Thames Water's requirements nor the requirements of London Plan policy 5.13 have been met, the current approach to sustainable drainage is unacceptable.

58 Given the nature and location of the development proposals, potentially suitable options could include:

- Permeable paving;
- Rainwater harvesting (to irrigate the green roof and/or for commercial unit WCs);
- Maximising the proposed green roof's ability to store water (e.g. through a combined green/blue roof); and
- Deliberately designing the landscaped area to capture and store the maximum amount of surface water, e.g. through the use of Stockholm tree pits, raingardens and attenuating planters. An example of this combined approach can be found at Derbyshire Street pocket park: http://www.susdrain.org/case-studies/case_studies/derbyshire_street_pocket_park_london_borough_tower_hamlets_1.html.

Transport for London

59 It is proposed that 40 car parking spaces (at a ratio of 0.2) will be provided. This is acceptable in line with London Plan Policy 6.13 'Parking'. However, only 5 blue badge bays are proposed. TfL would expect each wheelchair accessible unit to be designated a blue badge bay in accordance with the London Housing SPG. This would require an additional 15 bays be provided. The applicant should also explore the feasibility of providing a blue badge bay for the commercial element.

60 The development proposal includes parking for 345 cycles. This is allocated with 323 for the long-stay located within the basement and the remaining 22 as short-stay located in the public realm.

61 The proposed quantum of cycle parking does not meet the London Plan standards and therefore an increase of 15 long-term and 5 short-term cycle parking spaces should be provided. Moreover, TfL would not agree with the phased provision of cycle parking as a perceived lack of cycle parking can be a barrier to choosing to cycle. On that basis the full quantum should be provided upon occupation.

62 The applicant should also ensure that cycle parking is designed with reference with TfL's Best Practice Guidance, The London Cycle Design Standards, Chapter 8.

63 The applicant has undertaken a pedestrian environment review system (PERS) and cycling environment review system (CERS) audits, which is welcomed by TfL. It is therefore supported that the applicant proposes public realm works which will assist in delivering these improvements and TfL would recommend that CIL funding is allocated towards delivering those improvements identified within the wider local area.

64 The applicant has undertaken a multi-modal trip generation using TRAVL data. However, this has not been undertaken in accordance with TfL's Transport Assessment (TA) Best Practice Guidance as the residential modal split should be derived from either TRICS or local census data. On that basis, TfL requests that the multi-modal impact assessment is updated accordingly. Upon receipt TfL will assess the impact on the local public transport network and provide confirmation on whether any mitigation is sought.

65 Whilst TfL find the proposed method of servicing suitable, a full delivery and servicing plan (DSP) and construction logistics plan (CLP) should be secured by condition. In addition, the applicant should review the baseline modal split from the Travel Plan with Light to previous comments regarding TRAVL data.

66 In accordance with London Plan policies 6.5 and 8.3, relating to the Community Infrastructure Levy (CIL), the Mayor agreed to commence CIL charging for developments permitted on or after 1 April 2012. It is noted that the proposed development is within the London Borough of Brent, where the Mayoral charge is £35 per square metre gross internal area (GIA). The levy will raise £300 million towards the delivery of Crossrail. In addition, Brent Council adopted a CIL in February 2014 and the relevant rates in this instance are £200 per square metre of GIA residential and £40 per square metre of GIA retail dependent on the eventual occupier.

Local planning authority's position

67 The Council has been through a number of pre-application meetings with the applicant and is currently reviewing the various technical assessments undertaken by the applicant to ensure the viability of the housing offer is the maximum which can be secured at the site. The Council is also working with the applicant to improve the design of the scheme.

Legal considerations

68 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

69 There are no financial considerations at this stage.

Conclusion

70 London Plan policies on **housing, affordable housing, family housing provision, play space, design, inclusive access, climate change- energy and drainage**, and **transport** are relevant to this application. Whilst the application is broadly acceptable in strategic planning terms, further discussion and changes are required regarding the following issues:

- **Housing/affordable housing:** The results of the independent assessment of affordable housing provision should be shared with GLA officers demonstrating the maximum reasonable amount of affordable housing is being secured at the site. Further work may be required to secure a higher percentage of affordable family units to comply with the local policy and known needs.
- **Playspace/ private amenity space:** The communal amenity areas should be usable and the wind impacts as a result of the tower be clarified. This is particularly important since some of the units lacking private amenity space will be dependent on this shared provision.
- **Design:** The overall approach to internal residential quality is supported, however some clarification is sought as set out in the design section of this report to improve the scheme further.
- **Inclusive access:** the blue badge parking spaces should be equivalent of the 10% accessible units. Clarification of the split of the accessible units is required within the private and affordable tenures should the overall affordable housing provision be maximised. Site wide inclusive access measures should be specified and secured by the Council.
- **Climate change/energy:** The applicant has broadly followed the energy hierarchy. Sufficient information has been provided to understand the proposals as a whole. Further information is required before the final proposals can be understood.
- **Sustainable drainage:** The development proposals do not comply with London Plan policy 5.13 The drainage measures suggested for reducing surface water discharge rates at the site require consideration as per above and will need to be secured by the Council by way of condition.

- **Transport:** The proposal is considered to be potentially acceptable from a strategic transport perspective. However to ensure the application complies fully with London Plan transport policies, the various matters raised above should be addressed and the various S106 agreements and/or conditions be secured by the Council.

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

Justin Carr, Strategic Planning Manager (Development Decisions)

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

Sukhpreet Khull, Case Officer

020 7983 4806 email sukhpreet.khull@london.gov.uk
