

**1 Burlington Lane, Axis Centre, Unit 1 Hogarth
Business Park, Burlingotn Lane, Chiswick, W4 2TH****in the London Borough of Hounslow****planning application no. P2016/0027****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 provide circa 15,903 sq.m. (GIA) of B1a office floorspace with associated car parking, motor-cycle parking, bicycle parking and bus shuttle service drop off provided at ground level and basement level with associated landscaping at ground level incorporating repaving and planting.

The applicant

The applicant is **Burty Properties Ltd.**, the agent and architect is **tp bennett**.

Strategic issues

The principle of an **office redevelopment** is acceptable in land use terms, subject to an impact assessment and it needs to be demonstrated that the Council's local needs are met.

The **appearance** is considered generally in accordance with the London Plan.

The overall **design** and **access** arrangements are generally in accordance with the Mayor's standards; however some further information and consideration is still required regarding active frontages, blank facades, layout, landscaping, blue badge parking and wheelchair accessibility through the atrium.

Further discussion regarding **design, energy, parking and transport** impact, is required to ensure that the scheme fully accords with London Plan policies.

Recommendation

That Hounslow Council be advised that while the application is generally acceptable in strategic planning terms the application does not fully comply with the London Plan, with the reasons and remedies set out in paragraph 65 of this report.

Context

1 On 15 February 2016 the Mayor of London received documents from Hounslow 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 25 March 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 the following categories of the Schedule to the Order 2008:

"1B. 1.(c) 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 ... outside Central London and with a total floorspace of more than 15,000 square metres.

1C. 1.(a) Development which comprises or includes the erection of a building ... more than 25 metres high and is adjacent to the River Thames."

3 Once Hounslow 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 has an area of approximately 0.33 ha. Being located on a corner, the current building has a 95 metre frontage to surrounding roads, with most facing Burlington Lane. The current building comprises a solid brick and concrete enclosing wall at ground level, car parking at this and the level above, with office accommodation on the three levels above that. The communal entrance of the building is accessed from the much quieter internal access road.

6 The site is located within the Chiswick House Conservation Area. This conservation area is focused around the Grade I listed/schedule ancient monument Chiswick House, and its related landscaped gardens, grounds, outbuildings and monuments, many of which are also listed. The Conservation Area also includes a hinterland of surrounding development including the application site, located approximately 200 metres from the edge of the walled grounds. The Grade I listed Hogarth House also sits within the Conservation Area to the west of the application site. It shares a walled boundary with the adjacent residential development site and its garden currently allows a view of McCormack House, currently on the site. The wider conservation area is predominately residential uses, and whilst there is a wide variety of housing, most is large scale detached and semi-detached housing of two storeys with some substantial gardens, and groups of smaller Edwardian terraced housing.

7 In close proximity to the site, to the south-east, is the Old Chiswick Conservation Area which has a frontage to Burlington Lane directly opposite the site, beyond a flyover linking the A316 and A4. The area comprises the riverside settlement of Old Chiswick characterised by historic village street character and buildings (Grade I and II listed), including the former Griffin Brewery and large private 18th century and 19th century Georgian and Victorian houses with large gardens, some of which front the river.

8 The site is triangular in shape and is bounded to the west by residential development, to the north-east by the A4 Hogarth Lane, and to the south-east by the A316 Burlington Lane. Hogarth Lane and Burlington Lane meet at the signalised Hogarth roundabout, which is immediately to the east of the site. Both the A4 and the A316 form part of the Transport for London Road Network (TLRN).

9 There are no rail or underground stations within the maximum Public Transport Accessibility Level (PTAL) walk distance of 960 metres from the site. The 190 bus service, operates between Richmond and West Brompton, stops outside the site on Burlington Lane. As such, the site records a very poor PTAL of 1b on a scale from 1a to 6.

Details of the proposal

10 The proposal comprises the following:

- Circa 15, 903 sq.m. (GIA) of Grade A/B1a office floor space
- A landscaped perimeter to the site's surrounding public streets and external arrival space
- A interior atrium with sloping auditorium at ground level
- Landscaped roof terrace with green biodiversity roof
- A hopper bus connection to local overground and underground train station
- Integral hopper bus drop off facility with electric charging point underneath the building
- Business lounge for bus users within an enlarged reception area
- 150 bicycle stands for staff and victors
- Shower and changing facilities for cyclists/staff
- 163 car parking spaces
- Dedicated charging bay for nine electric vehicles
- 8 disabled parking bays
- Dedicated parking bays for six motorcyclists

11 Case history

12 There has been no GLA pre-planning application meeting held for this particular scheme.

13 Permission was granted for a five storey extension to the rear of adjacent to the shared access road in February 2014.

14 The site to the west is currently being developed by Berkeley Homes for 174 new residential units and some commercial floorspace (use class B1), granted permission in February 2014.

15 Permission was granted for conversion of the adjacent office building for conversion to a 162 bedroom hotel (due to be occupied by Premier Inn) in November 2015.

Strategic planning issues and relevant policies and guidance

16 The relevant issues and corresponding policies are as follows:

- Land use principles *London Plan*
- Urban design *London Plan; Shaping Neighbourhoods: Character and Context SPG;*
- Mix of uses *London Plan*
- Transport *London Plan; the Mayor's Transport Strategy*
- Parking *London Plan; the Mayor's Transport Strategy*
- Employment *London Plan*
- Access *London Plan; Accessible London: achieving an inclusive environment SPG*
- Air quality *London Plan; the Mayor's Air Quality Strategy; Control of dust and emissions during construction and demolition 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*

17 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 2011 Hounslow Core Strategy, 2015 Hounslow Local Plan, 2008 Hounslow Employment Development Document and the London Plan (Consolidated with Alterations since 2011).

18 The National Planning Policy Framework, Technical Guide to the National Planning Policy Framework is also relevant material considerations.

Principle of development

19 The site currently contains a five storey office building, comprising three floors of office space above two floors of car parking at ground and first floors. The applicant states that the present building dates to the 1980s and formed part of a larger complex known as the two McCormack buildings, with separate stair and lift core access connecting to a shared access road off Burlington and Hogarth Lanes, and the Hogarth Industrial Estate. The application site, 1 Burlington Lane, the southern building of the complex, currently provides 5,838 sq.m. (GIA excluding parking) of floorspace overall. The adjacent McCormack building known as Axis House is currently being converted into a 162 room hotel. The remainder of the former Hogarth Industrial Estate site is being redeveloped into residential, commercial and communal space.

20 As part of the redevelopment of the application site, an estimated 15,900 sq.m. of B1a office space is proposed, resulting in an uplift of office space at the site. The subject site is not part of the Hogarth Business Park site allocation in the Hounslow Local Plan (2015) nor is it listed under employment designations in the Hounslow Employment DPD. The site is however identified in the Hounslow Local Plan as a major employment hub outside of town centres and it is stated in paragraph 4.3 that:

Outside town centres and major employment locations, there are small businesses which contribute to the diversity of the local economy. A good quality range of office space will be required to meet the ever-changing needs of business in terms of size, location and costs. Whilst there is less evidence of demand for offices in out-of-centre locations, small scale offices in out-of-centre locations contribute to the diversity of the local economy.

21 The London Plan (e.g. Policies 4.1 'Developing London's Economy' and 4.2 'Offices') supports and promotes the development of London economy, encourages renewal and modernisation of the existing office stock in viable locations to improve its quality and flexibility, recommends the consolidation and extension of the strengths of the diverse office markets outside of clusters by promoting their competitive advantages, focusing new development on viable locations with good public transport, and seeks increases in the current stock where there is authoritative, strategic and local evidence of sustained demand for office-based activities. However the site has a poor PTAL of 1b and London Plan policy (i.e. Policy 4.7 'Retail and town centre development') notes assessment of the impact of proposals for new, or extensions to existing, edge or out of centre development should be applied.

22 As such, whilst the uplift of office space (use Class B1a) is supported in principle, the applicant is also asked to provide an impact assessment confirming a reasonable amount of replacement employment space has been included in the scheme, which is to be submitted to the GLA prior to Stage II. The Council should also confirm with the GLA prior to Stage II whether the B1a office space proposed as part of the scheme is in line with local needs.

Design

23 Good design is central to all objectives of the London Plan and is specifically promoted by the policies contained within chapter 7, which address both general design principles and specific design issues. London Plan Policy 7.1 'Lifetime Neighbourhoods' sets out a series of overarching design principles for development in London. Other design policies in this chapter and elsewhere in the London Plan include specific design requirements relating to maximising the potential of sites, the quality of new housing provision, tall and large-scale buildings and the public realm. New development is also required to have regard to its context, and make a positive contribution to local character within its neighbourhood (Policy 7.4 'Local Character').

Layout and design

24 The appearance of the proposed building, with brick and recessed window openings is welcomed and expected to be more sympathetic to the site's surroundings than the existing building.

25 However, the proposed building could be softened and better connected to its surroundings. The regular patterning of windows is welcomed and should be carried through on the south western corner walls of the proposed building, which are currently blank, to allow additional light into the building from the south, and create more architectural interest and detail in this part of the facade, viewed from Burlington Lane (northbound). Aside from the main entrance to the building there are no active frontages at ground level, which is predominately to be enclosing screens, replicating the defensive perimeter of the existing building. It is recognised that the roads surrounding this site create a harsh and noisy environment however passive surveillance and visual and spatial interest along the ground level facade allowing for views in from the footway and out from the space should be enhanced through the use of transparent materials and a change in use at ground level e.g. to more office/commercial space rather than car parking. Plans showing these recommended amendments should be provided to the GLA prior to Stage II.

26 Internally, the office space is open plan around an atrium, bringing light into the core of the building, which is welcomed. However the main core and stairwell (on the south-east corner of the site) could be rearranged against the northern boundary wall to better utilise the southern facade, and access to daylight and sunlight into the office space.

27 The rooftop garden and landscaping proposed on the plans for the scheme, are a welcomed addition to the site and should be secured by condition prior to Stage II. The views of the proposed buildings in Appendix 3 of the Design and Access Statement should also be amended to show the landscaping on and surrounding the site, depicted on the plans of the scheme. Further detail of the treatment of the atrium and whether any landscaping can be incorporated into its design should be examined before and this analysis should be provided to the GLA prior to Stage II.

Views and historic environment

28 As noted above the subject site falls within the Chiswick House Conservation Area and is adjacent to the Old Chiswick Conservation Area. London Plan Policy 7.8 'Heritage Assets and Archaeology' states that development should identify, value and conserve heritage assets. There is also a statutory duty to give special attention to the desirability of preserving or enhancing the character and appearance of these areas. Protection of views into and from Chiswick House and its grounds (scheduled monument and registered park/garden) is one reason that the surrounding streets, including the subject site, are located within the Conservation Area. The subject site itself does not contain any heritage assets nor does the redevelopment of the site include demolition of any buildings or structures important to the setting of the conservation area or involve construction on previously open, undeveloped land important to the setting of any surrounding designated heritage assets. The proposed building, of higher quality facade materials (i.e. brick), is expected to be more sympathetic to its surroundings, than the existing building and the landscape and visual impact assessment submitted suggests the impact on Hogarth's House, Chiswick House and grounds (Chiswick House Conservation Area), and listed buildings overlooking the site (Old Chiswick Conservation Area) will be limited. However, this only shows the outline views of the proposed building. Fully rendered views of the proposed building in full and should be provided before the application is referred back to the Mayor at Stage II. Furthermore, whilst it is acknowledged that the redevelopment of the adjacent site, Chiswick Gate, results in a mixed use block between the subject site and the Grade I listed Hogarth House, views from this building and its grounds, and in the context of the buildings at Chiswick Gate, currently under construction, between it and the proposed building at 1 Burlington Lane, should also form part of the additional view analysis to be provided to the GLA prior to Stage II.

Inclusive design

29 London Plan Policy 7.2 'An inclusive environment' requires that all new development achieve the highest standards of accessible inclusive design and supports the principles of inclusive design which seek to ensure they can be used safely, easily and with dignity by all regardless of disability, age, gender, ethnicity or economic circumstances; are convenient and welcoming with no disabling barriers, so everyone can use them independently without undue effort, separation or special treatment; are flexible and responsive taking account of what different people say they need and want, so people can use them in different ways and are realistic, offering more than one solution to help balance everyone's needs, recognising that one solution may not work for all.

30 In regard to the external environment, London Plan Policy 7.5 'Public Realm' requires that public spaces should be secure, accessible, inclusive, connected, and easy to understand. The design of landscaping and the public realm is crucial to inclusive design.

31 The application is accompanied by an access statement, which cover the principles of inclusive design access across the site, including levels, pedestrian routes, and drop off points. As presented, the layout of the buildings and the surrounding areas of public realm do not raise any inclusive design concerns, entrances, circulation routes and other common areas, reception and WCs are designed to be fully accessible and there appears to be step free access afforded across the application site, aside from through the atrium. In the plans wheelchair users cannot traverse the atrium space and additional wheelchair access on the stairs in the centre of the space that do not have a ramp or wheelchair lift, should be added to the plans, and this amendment should be forwarded to the GLA prior to Stage II.

32 In terms of parking provision, whilst the access statement notes the car parking area will feature blue badge holder bays and mobility scooter parking, the number of these compliant with relevant London Plan policy, is not currently provided. The number of blue badge holder bays should be provided to the GLA prior to Stage II and should also be secured by way of condition. Further points regarding wheelchair accessible parking bays are made in the transport section of the report below.

Sustainability

Energy efficiency

33 The applicant has broadly followed the energy hierarchy. Sufficient information has been provided to understand the proposals as a whole. The proposals are broadly acceptable; however, further information is required before the carbon savings can be verified.

34 In relation to energy efficiency measures, a range of passive design features and demand reduction measures are proposed to reduce the carbon emissions of the proposed development. Both air permeability and heat loss parameters will be significantly improved beyond the minimum backstop values required by building regulations.

35 Other features include low energy lighting including occupancy controls and dimming, a centralised air handling unit incorporating heat recovery and specification of variable speed fans and pumps throughout the building. The demand for cooling will be minimised through specification of solar control glazing.

36 The development is estimated to achieve a reduction of 94.6 tonnes per annum (24.9%) in regulated carbon dioxide emissions compared to a 2013 Building Regulations compliant development. The applicant is requested to provide sample BRUKL sheets including efficiency measures alone to support the savings claimed.

37 The applicant has carried out an investigation and there are no existing or planned district heating networks within the vicinity of the proposed development. The applicant should confirm that the development is designed to allow future connection to a district heating network should one become available in the future.

38 The applicant should confirm that the development will incorporate a site heat network and confirm all areas of the development will be connected to this network. Details of the size and location of the energy centre are required.

39 The applicant has investigated the feasibility of CHP. However, due the nature of the development and associated heat demands means, CHP is not proposed. This is accepted in this instance. The heating within the core areas of the development will be provided by a Low Temperature Hot Water (LTHW) network, feeding radiators and fed by high efficiency gas boilers.

40 The applicant has investigated the feasibility of a range of renewable energy technologies and is proposing to install a PV array of approximately 180 sq.m. A reduction in regulated carbon dioxide emissions of 13.2 tonnes per annum (4.6%) will be achieved through this third element of the energy hierarchy. The applicant should provide a roof plan of the proposed PV array and as the development is falling short of the London Plan's target, investigate the feasibility of higher efficiency PV panels.

41 Based on the energy assessment submitted as part of the planning application, a reduction of 107.8 tonnes of CO₂ per year in regulated emissions compared to a 2013 Building Regulations compliant development is expected, equivalent to an overall saving of 28.4%. The carbon dioxide savings fall short of the target within Policy 5.2 'Mitigating carbon dioxide emissions' of the London Plan. The applicant should consider the scope for additional measures aimed at achieving further carbon reductions or if further savings on site are not feasible, should ensure the short fall in carbon dioxide reductions, equivalent to 25 tonnes of CO₂ per annum through cash-in-lieu offset payment to the Council.

Flood risk

42 The site is generally within Flood Zone 1, with a small fringe of the site being in Flood Zone 2. There is no significant surface water flood risk at the site. Therefore the proposals are acceptable in terms of London Plan Policy 5:12 'Flood risk management'.

Surface Water Run-off

43 The Drainage Report states that the development will reduce surface water discharge by the inclusion of additional vegetated landscaping, green roof and rainwater harvesting. Given the nature and location of this development, this aspect of the proposals is considered to be an acceptable implementation of the drainage hierarchy within London Plan Policy 5:13 'Sustainable drainage'.

Transport for London's comments

44 Vehicular access will be via an existing road to the south of the proposal site, shared with adjacent residential development (under construction), and an adjoining vacant office building. Entry and exit to the existing access road is possible from Hogarth Lane (west bound) with exit only to Burlington Lane (east bound) as per existing. This is accepted by TfL.

45 TfL also supports that level pedestrian access to the building will be provided via a landscaped forecourt to the existing building. This includes planting and new surface materials to mark clearly the entrance to the new building entrance lobby.

46 The submitted transport statement (TS) stated that the proposal includes 159 car parking spaces; however both the design and access statement, and the planning statement suggested that it would be a total of 163 spaces. Based on the gross floor area of 15,903 sq.m. and with reference to the highest maximum London Plan limit of 1 space per 100 sq.m. for outer London locations, the maximum number of permitted parking space would be 159 spaces. As such, TfL asks the applicant to clarify parking level and to ensure that provision adheres to this London Plan limit.

47 While TfL welcomes that eight accessible spaces will be provided for disabled users, the proposal only includes 9 electric vehicle charging points (EVCPs). This falls well short of the London Plan standards which states that a minimum of 20% of all spaces should be provided with EVCPs along with a minimum 10% passive provision. The applicant should revise the proposal to be in line with London Plan policy 6.3 'Assessing effects of development on transport capacity'. In addition, TfL also recommends a car parking management plan to regulate parking activities on site.

48 The trip generation assessment estimated that the proposal would result in an increase of 60 two way car trips during the weekday AM peak and 53 in the PM peak. The applicant however has not undertaken any further trip distribution assessment on how this will impact on the highway network, in particular the A4. TfL therefore requires this to be provided for better understanding of potential traffic impact.

49 TfL advises that it is currently developing traffic/ pedestrian/ cycling improvement proposal for the Hogarth Roundabout. As previously advised, TfL may seek a financial contribution from this development, which will be advised in the near future.

50 The TS estimated that the proposal would result in an increase of 24 two ways bus trips during the AM peak. However, having noted that the nearest tube station is over 1km away from the site, it is therefore also reasonable to assume most people will catch the bus to travel between the site and the tube station, this could account for up to an additional 105 two-ways bus trips in the AM peak.

51 In the PM peak, the TA predicts there will be 95 departures by tube and 22 by bus. For the purpose of bus network planning, TfL will assume this could result in a total of up to 117 departures by bus. Notwithstanding the shuttle bus proposal mentioned in the TS, as little details has been provided, TfL would seek a contribution of £475,000, which equates to the cost of £95,000 per annum for 5 years toward providing additional AM and PM bus journeys, for example, route 160 to cater for potential demand for bus services and prevent overcrowding.

52 Whilst it is noted that the applicant has expressed an intention to provide a shuttle services to tube stations in the vicinity; TfL cannot advise on its acceptability due to lack of further detail. The applicant should provide additional information on such proposal to TfL for review.

53 TfL also asks that the applicant assesses the condition of the existing bus stops in the vicinity of the site and confirms whether they are DDA compliant.

54 TfL welcomes that a wider footway on Bath Road will be created by removing six surface car parking spaces; this should be secured by s106 agreement.

55 TfL requests that a Pedestrian Environment Review Audit (PERS) be carried out to assess walking conditions on routes between the site and local amenities including bus stops and shops/services. TfL or Hounslow Council may seek contributions for walking improvements based on the outcome of the study, to be secured by legal agreements.

56 TfL asks the applicant to assess the quality of the subway connection to Devonshire Road and propose recommendations concerning the possible need for improving the north-south link. TfL also considers that cycle lane widths on the A316 to the south west of this location could be increased. This will provide better connection to the wider cycle network, given that TfL is committed to improving cycle facilities on the A315, which will provide a direct link to central London, Hounslow is therefore encouraged to secure appropriate financial contribution toward this improvement.

57 The proposal meets the minimum of 106 long-stay spaces required under the London Plan standards. TfL however asks that the applicant to clarify whether and where the minimum 34 short-stay cycle parking spaces will be provided. The facility should be well managed and signposted to ensure they can be available to visitors.

58 TfL recommends that the carriageway of this access road is at least 4.5 metres wide to ensure safe cycle access, or a dedicated cycle facilities (i.e. cycle lanes) should be considered.

59 TfL asks the applicant to review the design of the proposed cycle storage ensuring it meet the London Cycle Design Standards in terms of dimensions and size.

60 A framework workplace travel plan was submitted by the applicant. TfL is pleased that it has passed the ATTrBUTE travel plan assessment. TfL asked that submission, and implementation of the finalised travel plan along with subsequent monitoring be secured by s106 agreement to accord with London Plan Policy 6.3.

61 In line with London Plan Policy 6.14 'Freight', TfL would have expected that a framework Delivery and Servicing Plan (DSP) would have been submitted. Unfortunately this was not the case, therefore a DSP will need to be submitted to Hounslow Council and secured by condition. Similarly, a framework Construction and Logistics Plan (CLP) should also have been submitted, this should also be secured by condition.

62 The Mayor has introduced a London-wide Community Infrastructure Levy (CIL) to help toward the funding of Crossrail. The rate for Hounslow is £35 per sq.m. The required CIL should be confirmed by the applicant and the Council once the components of the development or phase have been finalised.

Local planning authority's position

63 Hounslow Council's position is not known at this stage.

Legal considerations

64 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

65 There are no financial considerations at this stage.

Conclusion

66 London Plan policies on land use, design, heritage, access, sustainability and transport are relevant to this application. The application broadly complies with the London Plan however further information and/or confirmation, as detailed below is required to comply fully:

- **Land use principles:** The principle of an office redevelopment may be acceptable in strategic planning terms, however the applicant is also asked to provide a an impact assessment confirming the maximum reasonable amount of replacement employment space has been included in the scheme, which is to be submitted to the GLA prior to Stage II. The Council should also confirm with the GLA prior to Stage II whether the B1a office space proposed as part of the scheme is in line with local needs.
- **Design:** The design of the scheme is an improvement on the existing building, however further consideration should be given to active frontages, reducing blank facades, layouts and landscaping prior to Stage II. Further information regarding the townscape and visual impact of the development is required too .
- **Inclusive design:** The inclusive design provisions are welcomed; however plans should be amended to show wheelchair access traversing the atrium, and the number of blue badge parking spots. Inclusive design requirements should be secured via condition or legal agreement and the Council and the applicant should be mindful of this when drafting any related planning conditions and/or obligations.
- **Climate change:** Further information is required concerning the energy strategy for the site. The carbon dioxide savings (28.4%) fall short of the target within Policy 5.2 of the London Plan and the applicant should consider the scope for additional measures aimed at achieving further carbon reductions or if further savings on site are not feasible, should ensure the short fall in carbon dioxide reductions, through cash-in-lieu offset payment to the Council. The approach to flood risk and drainage is acceptable, and appropriate sustainability measures should be secured by way of condition.
- **Transport:** The application is generally acceptable in principle and in accordance with the transport policies of the London Plan subject to appropriate conditions and s106 obligations which should be secured in relation to cycle parking and facilities, parking permits, deliveries and servicing, car park management, construction logistics, public transport and a travel plan. Mayoral and local CIL payments will also need to be secured.

67 On balance, the application is generally acceptable in strategic planning terms however, does not fully comply with the London Plan, for the reasons set out above; though the possible remedies set out above could address these deficiencies.

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

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