

Gayton Road car park and Sonia Court, Harrow town centre

in the London Borough of Harrow

planning application no. P/0291/16

Strategic planning application stage I 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

Comprehensive redevelopment to provide 355 residential flats and 477 sq.m. of commercial and community space within buildings of between 5 and 11-storeys.

The applicant

The applicant is **Fairview Homes** and the architect is **Maccleanor Lavington**.

Strategic issues

The proposed **high density residential-led mixed use redevelopment** of this edge of town centre site, within the Harrow and Wealdstone **Opportunity Area**, is **strongly supported**.

However, issues with respect to **housing, urban design, sustainable development** and **transport** require resolution prior to the Mayor's decision making stage.

Recommendation

That Harrow Council be advised that whilst the scheme is broadly supported in strategic planning terms, the application does yet not comply with the London Plan for the reasons set out in paragraph 51 of this report. The resolution of these issues could, nevertheless, lead to the application becoming compliant with the London Plan.

Context

1 On 12 February 2016 the Mayor of London received documents from Harrow 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 24 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:

- 1A1. “Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats”; and,
- 1C1.(c) “Development which comprises or includes the erection of a building... more than 30 metres high... outside the City of London”.

3 Once Harrow 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 1.3 hectare site is located on the boundary of Harrow metropolitan town centre, at the transition with suburban residential hinterland. The site falls within the Harrow and Wealdstone Opportunity Area, and also forms part of the Harrow Housing Zone.

6 The site comprises three plots (from east to west): an open-air public car park; Sonia Court (a 3-storey 1960s residential block accommodating nine flats); and, the former Harrow library site (which is cleared, hoarded and currently used for the storage of building materials). The site is not within a Conservation Area and none of the existing buildings are Listed Buildings. Whilst much of the site is hardstanding or cleared ground, there are various vegetated areas – mainly on the Sonia Court plot, and around the boundary of the site. An arboricultural survey has identified 42 individual trees on site, and two small groups of trees. None of these trees are subject to a Tree Preservation Order.

7 Existing access to the site is from Gayton Road, with the plot bounded on its other sides by residential blocks to the east and west, and railway to the south. The context to the site is predominantly residential (with flatted blocks of between three and five storeys lining this part of Gayton Road).

8 In terms of the transport accessibility of the site, Harrow-on-the-Hill station (approximately 260 metres to the west) provides London Underground services (Metropolitan line) and national rail services (between Marylebone and Aylesbury). In addition, there are 15 bus routes (of which one runs 24 hours) within 400 metres of the site. Overall, the site registers a public transport accessibility level of between five and six, on a scale of zero to six(b), where six(b) denotes the most accessible locations in the capital.

Details of the proposal

9 The proposal is for comprehensive residential-led mixed use redevelopment to provide 355 residential flats and 477 sq.m. of commercial and community space within buildings of between 5 and 11-storeys. A total of 171 car parking spaces are proposed, distributed at basement and surface level.

Case history

10 In 2009 application P/4126/07 was approved at the site for 383 flats (in buildings of between 4 and 10-storeys) with 200 public car parking spaces and 81 resident parking spaces. This application was referable to the Mayor of London (refer to GLA report PDU/2030a/02). In 2012 application P/2632/12 was made for an extension of time on permission P/4126/07

(refer to GLA report PDU/2030b/01). However, this application was never determined, and was subsequently withdrawn when the applicant began to pursue a revised scheme.

11 On 15 September 2015 a pre-application meeting was held at City Hall to discuss the current scheme. The advice issued by GLA officers stated that the proposed residential-led redevelopment is supported in strategic planning terms. The applicant should, nevertheless, ensure that the future application addresses the matters discussed above with respect to: housing; urban design; inclusive access; sustainable development; and, transport.

Strategic planning issues and relevant policies and guidance

12 The relevant strategic issues and corresponding policies are as follows:

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|---------------------------|---|
| • Opportunity Areas | <i>London Plan;</i> |
| • Housing | <i>London Plan; Housing SPG; Housing Strategy; Shaping Neighbourhoods: Play and Informal Recreation SPG; Shaping Neighbourhoods: Character and Context SPG;</i> |
| • Affordable housing | <i>London Plan; Housing SPG; draft Interim Housing SPG; Housing Strategy;</i> |
| • Density | <i>London Plan; Housing SPG;</i> |
| • Urban design | <i>London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG;</i> |
| • Inclusive access | <i>London Plan; Accessible London: achieving an inclusive environment SPG;</i> |
| • Sustainable development | <i>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; Mayor's Ambient Noise Strategy;</i> |
| • Transport and parking | <i>London Plan; the Mayor's Transport Strategy;</i> |
| • Crossrail | <i>London Plan; and, Mayoral Community Infrastructure Levy.</i> |

13 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 2012 Harrow Core Strategy; 2013 Harrow and Wealdstone Area Action Plan; 2013 Development Management Policies Local Plan; and, the London Plan (consolidated with alterations since 2011).

14 The following are also relevant material considerations:

- The National Planning Policy Framework, Technical Guide to the National Planning Policy Framework and National Planning Practice Guidance.

Principle of development

15 As discussed in paragraph 5, the site is located at the edge of Harrow metropolitan town centre, within the Harrow and Wealdstone Opportunity Area and Harrow Housing Zone (which is prioritised for accelerated housing delivery with GLA funding support). London Plan Policy 2.13 identifies the Opportunity Area has having indicative capacity for 3,000 new jobs and 2,800 new homes.

16 The adopted Harrow and Wealdstone Area Action Plan (HWAAP) is the primary policy vehicle for shaping growth and change in this part of the borough, and this site is identified within the plan as representing a key opportunity to contribute towards the local and strategic

development objectives for the area. Design guidance within the HWAAP seeks a residential-led mixed use scheme supported by community/civic and commercial uses. Moreover, the site allocation establishes the principle of the loss of existing town centre public car parking at the site, as well as the redevelopment of Sonia Court (which comprises 9 existing dwellings).

17 Accordingly, the proposal to provide 355 new homes and 477 sq.m. of commercial and community space at this site responds well to the objectives of the HWAAP, and is supported in strategic planning terms.

Housing

18 Notwithstanding the proposed loss of nine existing private market units at Sonia Court, the proposal would provide 355 new homes in accordance with London Plan Policy 3.14. This provision is broadly equivalent to 60% of Harrow's annual housing delivery target, and 13% of the target for the Harrow and Wealdstone Opportunity Area as a whole. The proposed delivery of these units is strongly supported in accordance with the aims of London Plan Policy 3.3 (increasing housing supply). The proposed residential schedule is set out within the table below.

Unit type	Affordable rented	Private rented sector	Private market	Total
One-bedroom	16	12	63	91
Two-bedroom	48	17	119	184
Three-bedroom	8	24	48	80
Total	72	53	230	355

Affordable housing

19 London Plan Policy 3.12 seeks to secure the maximum reasonable amount of affordable housing when negotiating on mixed use schemes. Based on the housing schedule provided, the applicant is proposing 20% affordable housing by unit. In this case, a mono-tenure affordable rent provision has been agreed with Harrow Council on the basis that the Council intends to acquire and manage the affordable housing blocks itself. Whilst the absence of an affordable tenure split does not strictly comply with London Plan Policy 3.11, noting the proposed provision of private rented sector housing (which can generally respond to intermediate housing need), and the characteristics of the residential context generally, GLA officers are satisfied that the approach is acceptable in strategic planning terms.

20 Notwithstanding this, GLA officers expect the applicant's viability assessment to be independently reviewed in order to verify the maximum reasonable amount of affordable housing in accordance with London Plan Policy 3.12.

Private rented sector housing

21 London Plan Policy 3.8 (Housing Choice) and guidance within the Mayor's Housing SPG identify private rented sector (PRS) housing as addressing a distinct need, and recognise that the model is becoming increasingly important in terms of supporting labour market mobility. The SPG notes that PRS housing may be particularly suitable in instances of town centre intensification, and in locations benefiting from good transport connectivity.

22 Noting the particular characteristics of this site (refer to paragraphs 5 to 8 above), GLA officers are of the view that a PRS housing offer would be appropriate in strategic planning terms. Nevertheless, in accordance with the Housing SPG, GLA officers expect any future planning permission to secure the proposed PRS units as such for a fixed period of time (for example, a minimum covenant period of 15 years). Moreover, the Council should include a clawback

mechanism within the Section 106 agreement to recoup an affordable housing contribution if these units are sold out of the long term PRS market. The clawback mechanism should run with the covenant, but should not be less than 15 years.

Mix of units

23 The proposed housing schedule provides a good range of unit sizes between one and three-bedrooms across all tenures. GLA officers are content with the balance of unit types within the private market tenure. However, whilst it is acknowledged that this is an edge of town centre site, having regard to the weight London Plan Policy 3.11 places on prioritising family sized affordable homes, GLA officers seek further discussion with the applicant and the Council with respect to increasing the provision of three-bedroom affordable rented units (currently at 11%). The Council is encouraged to explore opportunities to achieve this as part of the viability review discussed in paragraph 20. Optimising the viability of the PRS element of the housing mix (by providing only one and two-bedroom typologies) may assist with this, and would be acceptable in strategic planning terms.

Residential standards

24 The submitted planning statement confirms that all dwellings will comply with the minimum space standards established by London Plan Policy 3.5 (Table 3.3). Given the proximity of the railway to the south of the site, particular care will need to be taken to maintain the highest standards of residential quality with respect to ambient noise. This and other components of residential quality are considered in the urban design section of this report.

Children's play space

25 Based on the residential schedule presented above, and the methodology within the Mayor's 'Shaping Neighbourhoods: Play and Informal Recreation' SPG (2012), the development would need to make provision for a minimum of 1,219 sq.m. of children's play and informal recreation space.

26 The applicant has set out details of the proposed play strategy within the planning statement and submitted design and access statement. It is noted that each plot would benefit from communal garden space, and that children's play has been designed as an intrinsic part of the proposed podium deck courtyard spaces. Moreover, a new (publically accessible) play facility for older children is proposed at the north-east corner of the site at Gayton Road. It is noted that, overall, the scheme would provide a 1,223 sq.m. provision of children's play space, and this provision is strongly supported in accordance with London Plan Policy 3.6.

Density

27 This site has a public transport accessibility level of between five and six, and GLA officers have classified the setting as urban in character. Noting these characteristics, the London Plan density matrix (Table 3.2 in support of Policy 3.4) suggests a residential density of between 200 to 700 habitable rooms per hectare for this scheme. The submitted planning statement confirms that the density of the development would be 810 habitable rooms per hectare. This is above the typical range identified by the London Plan, however, this quantum of residential development is generally consistent with the HWAAP site allocation. Noting this, and having considered the edge of town centre location, and Opportunity Area context, GLA officers support a high quality high density approach to redeveloping this site. Accordingly, (and in line with London Plan paragraph 2.62 and supporting guidance in the Mayor's Housing SPG) the proposal to exceed the typical range identified by the London Plan density matrix is acceptable

in principle. Furthermore, and having regard to the urban design assessment below GLA officers are satisfied that the proposed density is acceptable in strategic planning terms.

Urban design

28 The scheme is generally well thought out and introduces a well-defined and consistent building line along Gayton Road, with regular points of entry to residential cores along this street. This will contribute towards good levels of street-based activity and passive surveillance which is welcomed. The proposed blocks have been arranged to provide a good level of enclosure to amenity spaces, and to promote a sense of ownership for residents. This approach is supported.

29 The intention to contain car parking largely within a basement (with additional surface provision at the south east corner of the site for blocks D1 and D2) is supported in principle as this will allow the pedestrian environment to be optimised across the wider scheme. It is noted that, in response to pre-application advice, the applicant proposes landscaping and tree planting measures to improve the interface between block D2 and parking areas. This is supported in principle, and the Council is encouraged to secure detailed approval of these measures by way of planning condition.

30 The scheme would provide a generally consistent scale of blocks along Gayton Road (8-storeys for blocks A, B and C, and 5-storeys for block D). GLA officers support this approach in townscape terms on the basis that it would provide good definition to Gayton Road, and would also offer a transition in scale to existing development to the east. The tallest elements of the proposal (up to 11-storeys) are proposed on the southern portion of the site, close to the railway. Having regard to the architectural quality of the scheme (discussed below), and noting that the proposed courtyard amenity spaces would comply with Building Research Establishment overshadowing guidelines, GLA officers are satisfied that the application accords with London Plan Policy 7.7.

31 In terms of residential quality, the orientation of blocks and positioning of cores works well to support a high quality residential environment. The scheme generally responds well to design guidance within the Mayor's Housing SPG – providing a high level of dual aspect units, and optimising unit to core ratios. However, as was noted at pre-application stage, level changes at the site (particularly associated with the partially sunken basement car park) present a number of challenges to providing ground floor front doors for all units. However, GLA officers are of the view that there remain opportunities to introduce ground floor front doors for units facing courtyard amenity spaces, as well as for ground floor dwellings in blocks D1 and D2. Accordingly, the applicant is strongly encouraged to incorporate such provision, which would support easy access to amenity/play spaces (particularly for family sized units), and would help to enhance community building opportunities for residents.

32 As discussed in the housing section of this report, the proximity of the railway presents potential residential quality issues associated with ambient noise at lower levels of the southern facade. Notwithstanding this, having regard to the findings of the submitted noise assessment, GLA officers are of the view that the impacts appear to be capable of acceptable mitigation through conventional design and construction measures. Accordingly, the Council is encouraged to secure detailed approval of the necessary construction material standards to ensure that noise issues would be appropriately mitigated in accordance with London Plan Policy 7.15.

33 The architectural approach is simple and refined. The predominant use of brick as the primary facing material would create a robust and durable set of buildings, and helps to ensure that the scheme would respond well to the character of the area. The proposed detailing of

window reveals and protruding balconies has also been well considered, and overall GLA officers strongly support the response in accordance with London Plan Policy 7.6.

Inclusive access

34 The applicant has addressed matters of access and inclusion within the planning statement and design and access statement. These documents demonstrate that the proposed design of residential entrances, circulation spaces and public realm has been generally well handled in access terms. The rationalisation of vehicular access/egress in order to prioritise pedestrian movement on-site is particularly supported. The submission documents also confirm that a 10% provision of wheelchair accessible/adaptable units would be provided, along with a 1:1 ratio of Blue Badge parking. This is supported, and the Council is advised to include planning conditions to secure Building Regulation standards M4(2) and M4(3) as per the London Plan Policy 3.8.

Sustainable development

Energy strategy

35 For the purposes of assessing applications against the carbon dioxide savings target within London Plan Policy 5.2, the Mayor now applies a 35% reduction target beyond Part L 2013 of Building Regulations. In accordance with the principles of Policy 5.2 the applicant has submitted an energy statement for the scheme, setting out how the development proposes to reduce carbon dioxide emissions. In summary the proposed strategy comprises: energy efficiency measures (comprising a range of passive design features and demand reduction measures); and; a (future-proofed) site-wide network driven by gas fired CHP). Photovoltaic (PV) panels have been identified by the applicant as feasible in this case, but are not currently proposed to be incorporated as part of the strategy. Based on the strategy proposed the scheme would achieve a 36% carbon dioxide saving. This is supported in principle, however, GLA officers are seeking a number of detailed clarifications from the applicant team (with respect to minimising cooling demands in particular). The applicant is also encouraged to incorporate PV where feasible and viable, in order to maximise carbon dioxide savings in line with London Plan polies 5.2 and 5.7.

Climate change adaptation

36 The proposed landscaping strategy presents various opportunities to deliver new green infrastructure on site through a planting strategy focusing on native species. This is supported, however, it is recognised that soft landscaped spaces at ground level must principally serve an amenity function. Nevertheless, it is noted that the proposed massing of the blocks would lend itself well to a roofscape strategy incorporating ecological terraces. However, whilst the design and access statement suggests a comprehensive brown roof approach, this does not appear to be reflected within the accompanying ecology and sustainability statements. Accordingly, GLA officers would welcome clarification on proposals in this regard. The applicant is encouraged to pursue a roofscape strategy that would deliver a range of viable benefits (e.g. ecological green/brown roof, amenity terrace, photovoltaic array) in response to London Plan policies 5.7, 5.11 and 7.19. Such provision would also assist the development in maximising the reduction of surface water runoff in line with London Plan Policy 5.13. Once agreed, the Council is encouraged to secure detailed approval of urban greening and sustainable urban drainage measures by way of planning condition.

37 Notwithstanding the provision of various new areas of green infrastructure on-site (and the retention of existing high quality mature trees wherever possible), it is proposed to remove 30 existing trees in order to facilitate the redevelopment. Fourteen of these trees are of 'moderate' quality, fourteen are of 'low' quality, and two trees are identified as 'unsuitable for retention'. The applicant proposes to mitigate the loss of these trees through the replacement planting of 82 new

trees within the scheme and along Gayton Road. Having regard to the quality of the existing trees, and the nature of the proposed re-provision, GLA officers are satisfied that the application accords with London Plan Policy 7.21.

Transport

Site access and servicing

38 At TfL's request a Stage 1 safety audit was undertaken, this has acceptably demonstrated the suitability of the proposed rationalisation of site accesses. Moreover, the supplied auto-tracking indicates that all relevant vehicles could turn on site, and exit in a forward gear. This is supported, and TfL has concluded that there is no need to move the neighbouring Gayton Road bus stop to facilitate the proposed development at this time. TfL welcomes the applicant's proposed measures to mitigate the risk of vehicles overtaking buses waiting at the westbound stop, namely "no overtaking signs" on Gayton Road, albeit this is at the Highway Authority's discretion.

39 The servicing for the site is proposed to be undertaken off-street, and by HGV if required. Based on the submitted framework Delivery and Servicing Plan (DSP) TfL is satisfied that this is acceptable. A final version of this plan should be secured by way of planning condition in accordance with the London Plan Policy 6.14.

Parking

40 It is noted that the applicant has reduced the level of car parking following concerns raised by TfL during pre-application discussions. This represents a reduction from the initially-proposed 60% ratio/216 spaces (to include 35 disabled spaces), to 48%/171 spaces. This is supported, and is consistent with other schemes in the area. Disabled parking provision is London Plan compliant, and the applicant has committed to providing electric vehicle charging points to London Plan standards. It is noted that the area is already part of a Controlled Parking Zone, and TfL supports the Council's intention to restrict residents of the scheme from obtaining local parking permits. The applicant's intention to provide car club space(s) on site is also welcomed. All these proposed provisions should be secured by way of planning condition/obligation as appropriate, together with a car parking management plan.

41 TfL is satisfied that cycle parking provision is acceptable having regard to recently revised London Plan standards (which are now one space per one-bedroom unit and two-spaces for all other units). In addition to the residential provision, one space per 40 units is proposed for visitors to use. This is supported, however, the applicant should confirm where a secure, convenient and covered long term cycle space for the commercial and the community space is to be located (for staff use).

42 TfL supports the provision of easy-to-use Sheffield stands in various locations at surface level for visitors. Residential provision will comprise a mix of Sheffield stands and two-tier racks - to be provided in communal stores and within the basement. The applicant is, nevertheless, asked to confirm that there is a separate, convenient dedicated access for cyclists to the basement parking, as currently it would appear that all cyclists (of whatever proficiency) are expected to share a two-way ramp with vehicles. This is not best practice. The Council is encouraged to secure details of cycle storage by way of planning condition.

Impact on public transport

43 TfL notes that the overall traffic generation is likely to be lower than with the existing land-uses, particularly the car park. The estimated modal split and trip levels for public transport are supported. The 10% bus mode share (equivalent to 23 added journeys in the morning peak) seems low, however, given that many more people will choose to walk or cycle direct to Harrow-on-the-Hill station, it is accepted that the focus of impact is on tube and rail travel (47% and 110 trips in the morning peak). The impact of the additional bus passengers is not anticipated to create a capacity issue, especially as the busiest sections of the H9/H10 service are elsewhere on the routes. Comments on the mitigation of impacts on Harrow-on-the-Hill station are set out below.

Cycling and walking

44 TfL has advised the applicant of the intended future cycling infrastructure in the area, which centres principally on a new Quietway route. In view of the Quietway plans, TfL welcomes the detail with which the applicant has assessed crossings/junctions in terms of cycle safety. Having regard to the findings of the pedestrian and cycling environment assessments, TfL would be pleased to discuss with the Council the scope of the contributions towards local public realm and safety improvements (which it envisages would be paid to Harrow Council). TfL may also seek a contribution towards wayfinding, including Legible London signage.

Construction and travel planning

45 The applicant appears not to have supplied a Construction Management Plan (CMP) in framework form; such a plan is particularly necessary for managing any temporary impact on highway and bus services. TfL expects the Council to secure a CMP and a Construction Logistics Plan (CLP) by way of planning condition. Guidance on the detailed preparation of these plans can be found on TfL's website. TfL welcomes that the applicant has submitted a framework travel plan, which has passed its 'ATTrBuTE' assessment exercise. TfL expects the travel plan to be submitted for approval by the Council in consultation with TfL prior to occupation.

Harrow-on-the-Hill station

46 In response to local and strategic objectives to enhance Harrow-on-the-Hill station, the HWAAP identifies a range of important upgrades (for example the need for step free access and visitor cycle parking). In support of these aspirations TfL is drawing up a station upgrade scheme (currently estimated to cost in the region of £20 million). Noting that such mitigation will be secured via the Harrow Community Infrastructure Levy (CIL) (rather than from Section 106), TfL strongly encourages the Council to prioritise this particular public transport infrastructure improvement within its apportionment of CIL.

Mayoral community infrastructure levy

47 In accordance with London Plan Policy 8.3 the Mayoral CIL came into effect on 1 April 2012. All new development that creates 100 sq.m. or more additional floorspace is liable to pay the Mayoral CIL. The levy is charged at £35 per square metre of additional floor space in the London Borough of Harrow.

Local planning authority's position

48 Harrow Council is expected to formally consider the application at a planning committee meeting at the end of May 2016.

Legal considerations

49 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

50 There are no financial considerations at this stage.

Conclusion

51 London Plan policies on Opportunity Areas, housing, urban design; inclusive access; sustainable development; and, transport are relevant to this application. The application complies with some of these policies, but not with others, for the following reasons:

- **Opportunity Areas:** The proposed high density residential-led mixed use redevelopment of this Opportunity Area site is strongly supported in accordance with London Plan Policy 2.13.
- **Housing:** The proposal to provide 355 new homes at this site is strongly supported in accordance with London Plan Policy 3.3. The proposed provision of affordable housing should, nevertheless, be independently verified in accordance with London Plan Policy 3.12. As part of this locally-led viability review, GLA officers encourage the Council to explore the potential for this scheme to accommodate a greater provision of three-bedroom affordable rented units.
- **Urban design:** The scheme is generally of a high design quality, and GLA officers are satisfied that the scale of the proposed development accords with the principal objectives of London Plan Policy 7.7. However, the applicant is strongly encouraged to introduce ground floor front doors for units facing courtyard amenity spaces, as well as for ground floor dwellings in blocks D1 and D2.
- **Inclusive access:** The approach to access and inclusion is broadly supported in accordance with London Plan Policy 7.2.
- **Sustainable development:** The proposed energy strategy and climate change adaptation measures are broadly supported in strategic planning terms. Following the conclusion of discussions on the energy strategy, the Council is encouraged to secure associated energy and climate change adaptation details by way of planning condition in accordance with London Plan policies 5.2, 5.10, 5.11, 5.13, 7.19 and 7.21.
- **Transport:** Whilst the scheme is broadly acceptable in strategic transport terms, matters raised with respect to: site access and servicing; cycle parking; impact on public transport; cycling and walking; and, construction and travel planning should be addressed to ensure accordance with London Plan policies 6.3, 6.9, 6.10, 6.13 and 6.14.

52 The resolution of the above issues could result in the application becoming compliant with the London Plan.

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