

24 November 2015

Alpha Square, Isle of Dogs

in the London Borough of Tower Hamlets

planning application no. PA/15/02671

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 all existing buildings, and erection of two buildings of up to 34 and 65-storeys (124.15 metres AOD and 217.50 metres AOD), comprising 634 residential units and a 231-bedroom hotel, together with a two-form entry primary school, replacement healthcare facilities, retention of an existing public house, ground-floor commercial floorspace, and basement parking, together with access, servicing, and landscaping.

The applicant

The applicant is **Drakar Limited** on behalf of **Far East Consortium International Limited**, and the architect is **Pilbrow & Partners**.

Strategic issues

The principle of the housing-led mixed-use redevelopment of this site, which includes the provision of education infrastructure, is strongly supported. There are a number of outstanding strategic planning concerns relating to **housing**, **climate change** and **transport**.

Recommendation

That Tower Hamlets Council be advised that, whilst the principle of the proposal is strongly supported, the application does not comply with the London Plan, for the reasons set out in paragraph 82 of this report. However, the resolution of those issues could lead to the application becoming compliant with the London Plan.

Context

1 On 23 October 2015 the Mayor of London received documents from Tower Hamlets Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor has until 3 December 2015 to provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under the following Categories of the Schedule to the Order 2008:

- **Category 1A:** *“Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats”.*
- **Category 1B:** *“Development (other than development which only comprises the provision of houses, flats, or houses and flats), which comprises or includes the erection of a building or buildings outside Central London and with a total floorspace of more than 15,000 sq.m.”.*
- **Category 1C:** *“Development which comprises or includes the erection of a building more than thirty metres high and outside the City of London”.*

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

4 The environmental information for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 has been taken into account in the consideration of this case.

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

Site description

6 The 0.4 hectare site is located on Marsh Wall, Manilla Street and Byng Street, within the South Quay area immediately to the south of Canary Wharf, on the Isle of Dogs. The application site is split into two development parcels, separated by Manilla Street, which cuts through the site on a north-south orientation. The western section of the site comprises a parcel of land bound by Manilla Street to the north and east, industrial units to the south, and residential properties to the west, and currently comprises low-rise industrial units with an area of parking. This section of the site includes a three-storey public house, which is within the red line boundary, and a single garage adjacent to the public house, which falls outside of the boundary, but forms part of the existing urban block.

7 The eastern section of the site, which currently comprises low-scale industrial buildings, a single-storey private healthcare centre, and an area of locally designated open space, is bound by Marsh Wall to the north, Manilla Street to the west, Byng Street to the south, and a three-storey office building with hard surface car-parking to east. The site immediately to the east was the subject of a strategic planning application for a linked 29 and 39-storey building, comprising 240 residential units (our ref: D&P/2910/01); the application was subsequently withdrawn by the applicant. This section of the site also includes a set of steps linking Manilla Street to Byng Street.

8 All roads surrounding the site are part of the borough highway network. The nearest section of the Transport for London Network is the Limehouse Link, 850 metres to the north-east of the site. Canary Wharf underground station is located 760 metres to the north, and provides access to Jubilee line services. South Quay (500 metres to the east), Heron Quays (400 metres to the north) and Canary Wharf (650 metres to the north) all provide access to Docklands Light Railway (DLR) services on the Lewisham to Bank/Stratford branch. From 2019, Crossrail will also serve this area from Canary Wharf station at West India Dock, approximately one kilometre to the north. Five bus services (D3, D7, D8, 135 and 277) operate within reasonable walking distance of this site. As such the site records a good public transport accessibility level (PTAL) of four.

9 The site sits within a number of strategic views and river prospects, as identified in the Mayor's London View Management Framework, including View 1A.1: Alexandra Palace, View 2A.1: Parliament Hill, View 4A.1: Primrose Hill, View 5A.1: Greenwich Park, View 6A.1 Blackheath, View 11B.1: London Bridge, View 11B.2: London Bridge, View 12B.1: Southwark Bridge, and View 15B.1: Waterloo Bridge. The site also falls within the wider setting of the Maritime Greenwich World Heritage Site. At the local level, the site sits within the Council's South Quay Masterplan Supplementary Planning Document.

Details of the proposal

10 Drakar Limited on behalf of Far East Consortium International Limited is seeking full planning permission for the demolition of all existing buildings, and the erection of two buildings, located either side of a redeveloped Manilla Street. The western building ranges in height from five to 34-storeys (up to 124.15 metres AOD), and comprises a two-form entry primary school with community room, and 139 residential units. The eastern building ranges in height from twenty to 65-storeys (up to 217.50 metres AOD) and comprises 495 residential units, and a 231-bedroom hotel, together with a healthcare centre and ground-floor cafe/restaurant use. Manilla Street is proposed as a central square between both buildings, which features landscaped elements, although it will remain an operational street still in the control of the Council. At the northern end of Manilla Street a new stepped, and ramped, route through onto Marsh Wall is proposed. The application also includes the retention of the existing North Pole public house, which will be refurbished and retained as a drinking establishment (Use Class A4).

Case history

11 On 12 January 2015 the Mayor of London received documents from Tower Hamlets Council notifying him of a planning application of potential strategic importance at the Alpha Square site, also submitted by Drakar Limited on behalf of Far East Consortium International Limited (D&P/3473/01). On 18 February 2015, the Mayor considered a consultation report on the proposal, which comprised "*Demolition of all existing buildings, and erection of two buildings of up to 32 and 63-storeys, comprising 727 residential units and a 273-bedroom hotel, together with a two-form entry primary school, replacement healthcare facilities, ground-floor commercial floorspace, and basement parking, together with access, servicing, and landscaping*". The Mayor concluded that the principle of the redevelopment was acceptable, and the provision of education infrastructure was strongly supported. However, there were a number of outstanding strategic planning concerns relating to housing, urban design, climate change and transport that were required to be addressed before the application could be considered acceptable in strategic planning terms. In June 2015 the applicant withdrew the application, prior to its determination at the Council's Planning Committee.

Strategic planning issues and relevant policies and guidance

12 The relevant issues and corresponding policies are as follows:

- Housing *London Plan; Housing SPG; draft interim Housing SPG; Housing Standards Policy Transition Statement; Housing Strategy; Shaping Neighbourhoods: Play and Informal Recreation SPG; Shaping Neighbourhoods: Character and Context SPG; Social Infrastructure SPG*
- Affordable housing *London Plan; Housing SPG; draft interim Housing SPG; Housing Standards Policy Transition Statement; Housing Strategy*
- Density *London Plan; Housing SPG; draft interim Housing SPG; Housing Standards Policy Transition Statement; Housing Strategy*
- Urban design *London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG; draft interim Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG*

- Tall buildings/views *London Plan; London View Management Framework SPG*
- Historic Environment *London Plan; World Heritage Sites SPG*
- Access *London Plan; Accessible London: achieving an inclusive environment SPG*
- Blue Ribbon Network *London Plan*
- Sustainable development *London Plan; Sustainable Design and Construction SPG; Mayor's Climate Change Adaptation Strategy; Mayor's Climate Change Mitigation and Energy Strategy; Mayor's Water Strategy*
- Transport *London Plan; the Mayor's Transport Strategy*
- Parking *London Plan; the Mayor's Transport Strategy*

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 Tower Hamlets Council's Core Strategy (2010) and Managing Development Document (2013), and the London Plan (Consolidated with Alterations since 2011). The draft Minor Alterations to the London Plan (2015), the Council's South Quay Masterplan Supplementary Planning Document (2015), and the National Planning Policy Framework and Technical Guide to the National Planning Policy Framework, are also relevant material considerations.

Principle of development

14 The site lies within the Isle of Dogs and South Poplar Opportunity Area, as identified in the London Plan. London Plan Policy 2.13, and Table A1.1, states that the Opportunity Area is capable of accommodating at least 10,000 homes, and 110,000 jobs up to 2031. The London Plan recognises that the north of the Isle of Dogs forms a strategically significant part of London's world city offer for financial, media and business services, and that surplus business capacity south of Canary Wharf provides an opportunity to deliver new housing, and to support a wider mix of services for residents, workers and visitors. The site is not identified for employment use within the London Plan.

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

Employment floorspace

16 The existing buildings provide a total of 2,137 sq.m. of floorspace currently in light industry and storage use (Class B1(c) and B8), which is not proposed to be reprovided as part of this application. Whilst the London Plan seeks a rigorous approach to industrial land management, the existing site is not identified at the strategic or local level for industrial use. Furthermore, as set out above, London Plan Policy 2.13 (and supporting Table A1.1), makes clear that there is scope to convert surplus business capacity south of Canary Wharf. In this context the loss of a small quantum of employment floorspace as part of this application is acceptable in strategic planning terms. It should also be noted that a number of employment generating uses will be created on site through the hotel and cafe, the retention and refurbishment of the public house, together with the school and health centre.

Hotel provision

17 London Plan Policy 4.5 encourages the provision of visitor accommodation within the Central Activities Zone and London's Opportunity Areas, in areas with good public transport accessibility to central London. The provision of a 231-bedroom hotel is therefore acceptable in accordance with strategic policy. The applicant has confirmed that 10% of the rooms will be accessible, and that an access management plan will be established. Both of these requirements should be secured by the Council as part of any future grant of planning permission.

Housing

18 London Plan Policy 3.3 provides explicit strategic support for the provision of housing within London, and sets a target for the Council to deliver a minimum of 39,314 homes in the Plan period 2015-2025. London Plan Policy 2.13 (and supporting Table A1.1) recognises the significant potential of the Isle of Dogs and South Poplar Opportunity Area to accommodate new homes, and identifies a minimum of 10,000 new homes. Given the site's context within the Isle of Dogs and South Poplar Opportunity Area, the principle of the housing-led redevelopment of this site, to include 634 new homes, is therefore supported.

School infrastructure

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

20 The application includes a two-form entry primary school that will accommodate up to 420 pupils. The school hall has been designed so as to allow for community use outside of school hours, and includes kitchenette and bathrooms, together with independent access. The inclusion of a new primary school as part of this application, with dual-use of its facilities by the community, is strongly supported in accordance with London Plan Policy 3.18.

Open space

21 London Plan Policy 7.18 resists the loss of locally protected open space. The Council, in its Development Management Policies Development Plan Document, states that development on open space will only be allowed in exceptional circumstances where, as part of a wider development proposal, there is an increase of open space and a higher quality open space outcome is achieved.

22 The application site includes a 287.3 sq.m. area of land that the Council has stated is designated as open space in the Council's Open Space Strategy, known as Wayside Gardens, although this site is not listed within that document. The land is fenced off and existing vegetation is heavily overgrown; consequently it is neither visibly nor physically accessible. The application proposes the loss of this area of open space.

23 The loss of open space is contrary to strategic and local policy. Furthermore, it is important to note that, as set out in the Council's South Quay Masterplan SPD, given the significant potential for substantial change within the Isle of Dogs, it is vital that sufficient publicly accessible open space is provided as part of all development proposals. In this context the loss of this area of open space without the generous re-provision of publicly accessible open space, to include additional provision to serve the development itself, would not be acceptable.

24 The application includes the provision of public realm in the form of a piazza located between the two buildings dissected by Manilla Street, and an eleven metre landscaped staircase linking Byng Street and Marsh Wall. The provision of a legible and fully-accessible pedestrian route linking Byng Street and Marsh Wall is strongly supported in accordance with the principles of the South Quay Masterplan SPD, and will deliver demonstrable benefits to permeability within the South Quay area. The provision of ground-floor publicly accessible open space in the form of the proposed piazza is also supported.

25 The provision of improved connectivity, and a publicly accessible ground-floor piazza space, accords with the principles of the South Quay Masterplan SPD, and will deliver an increase in the quantum of open space against that currently provided on site. In this context, the proposal delivers both quantitative and qualitative improvements to open space provision which is considered by GLA officers to adequately off-set the loss of the reported locally designated open space, and will meet the additional need arising from the development. The applicant has responded positively to previous concerns raised regarding the detailed design of these spaces; the proportion of green infrastructure, including grass areas and street trees, has been increased, which together with the provision of seating, will deliver a meaningful piece of public realm. The detailed design of the piazza and the staircase should be secured by condition.

Health infrastructure

26 London Plan Policy 3.16 seeks to protect healthcare facilities. The site currently includes a 464.5 sq.m. healthcare centre, run by a private operator. The application includes the provision of a 398 sq.m. healthcare centre; this centre has been designed for possible future use by an NHS operator, although it is apparent that this facility may not meet the requirements of the Clinical Commissioning Group, who require larger-style facilities. It is acknowledged that the site is constrained, and that a large proportion of ground-floor is already proposed for education use. The applicant has demonstrated that, without the loss of the hotel-use at the ground-floor of Marsh Wall, it would be difficult to provide additional health facilities to meet the CCG requirements. Nevertheless, the applicant has retained the provision of a healthcare facility in its proposal should this be required.

27 Whilst the proposal would result in a loss of healthcare floorspace, it is acknowledged that the existing facility provides private healthcare, primarily to support the office function at Canary Wharf, and therefore its loss does not raise strategic concern; an approach also accepted by both the GLA and the Council with regards to the South Quay Plaza application (D&P/3191). It should also be noted that through the provision of a two-form entry primary school, the application is providing significant social infrastructure benefits that are considered to adequately off-set any potential loss in private health care facilities.

Supporting uses

28 The application includes the provision of a retail unit set within the base of the eastern tower and fronting the proposed Alpha Square piazza. The proposed hotel also includes a bar and restaurant located on the ground and lower ground-floors. In accordance with London Plan Policy 4.7, it is vital that large-scale retail be appropriately focused within the Isle of Dogs town centre network. However, the provision of a small-scale mix of uses as part of high-density development within Opportunity Areas can help to meet the needs of local residents, and also assist in activating the ground-floor. The inclusion of retail, bar and restaurant space as part of this development is of an appropriate scale to be ancillary to the residential and hotel uses, provides active uses at ground-floor, and is therefore supported in accordance with London Plan policy.

Need for comprehensive development

29 London Plan policies encourage development proposals to take account of, and interact with, their immediate surroundings. London Plan Policy 7.1 requires development to be designed so that the layout, tenure and mix of uses interface with surrounding land, and Policy 3.7 seeks to ensure that the development of sites delivering substantial quantities of housing are co-ordinated. The applicant has responded positively to concerns raised previously regarding the existing North Pole public house, which was excluded from the previously submitted application; the public house has subsequently been acquired by the applicant and incorporated within the proposal. The London Plan recognises the important role that London's public houses can play in the social fabric of communities (policies 3.1 and 4.8, and supporting paragraph 4.48A), therefore the retention of this use within the scheme is strongly supported. Furthermore, the inclusion of the public house in this revised application provides considerable clarity and certainty regarding the piazza proposals; the active frontage that will be provided by the public house use will further animate this space, and given the quality of its existing architecture, the building's retention will also secure an important and welcome historical asset. The applicant is therefore commended for its positive response to previous concerns.

Summary

30 As set out above, given the site's context within the Isle of Dogs Opportunity Area, and the strategic priority afforded to housing, the principle of the housing-led mixed-use redevelopment of this site is supported, and the provision of hotel, retail and healthcare floorspace is acceptable in accordance with strategic policy. The application includes the provision of a two-form entry primary school, which will ensure the delivery of key infrastructure within the Isle of Dogs, responds positively to strategic requirements and the priorities of the Council's South Quay Masterplan SPD, and as such is strongly supported. The applicant has responded positively to concerns raised previously regarding the North Pole public house, and its retention is a welcome addition.

Housing

31 The application includes 634 residential units. A detailed housing schedule is provided below:

unit type	market	affordable rent	intermediate	total
studio	52	0	0	52
one-bed	193	36	11	240
two-bed	213	6	24	243
three-bed	51	33	0	84
four-bed	0	15	0	15
total	509	90	35	634

Affordable housing

32 London Plan Policy 3.12 requires borough councils to seek the maximum reasonable amount of affordable housing when negotiating on individual private residential and mixed-use schemes. The proposal currently includes 125 affordable units, which represents 20% of overall housing provision (understood to be 25% when measured by habitable room). The applicant has submitted a financial viability report in support of its proposals, which is being independently assessed by the Council. It is therefore not possible at this stage to determine whether the application provides the maximum reasonable amount of affordable housing in accordance with London Plan Policy 3.12.

33 London Plan Policy 3.11 establishes a strategic target that 60% of affordable housing provision be for social housing (comprising affordable rent and social rent), and 40% for intermediate provision. The Council, in its Managing Development Document, requires proposals to provide affordable housing on a 70:30 social housing to intermediate housing split. The affordable housing is currently split 72:28 when measured by units, which, whilst at the top end of local policy requirements, is in broad accordance with strategic and local policy, and is therefore acceptable.

Housing choice

34 London Plan Policy 3.8, together with the Mayor's Housing SPG, and the draft Revised Housing Strategy, seek to promote housing choice and a balanced mix of unit sizes in new developments. London Plan Policy 3.11 establishes that strategic priority be afforded to the provision of affordable family homes. The proposal includes 99 family units, equating to 16% of overall housing provision. In accordance with strategic policy, the applicant has prioritised family affordable provision, and as such 48 of the family units are identified as affordable, equating to 53% of total social housing provision.

35 In considering the previously submitted application, concern was raised with regards to the proportion of studio units; the high quantum proposed was negatively impacting on housing mix and residential quality, particularly with regards to single-aspect units and number of units per core. The applicant has responded positively to comments made, and the number of studios has reduced from 187 to 52; this equates to 8% of overall housing provision and 10% of market housing, down from 26% of overall housing provision and 31% of market housing provision. The reduction is supported, and as detailed in paragraph 50 of this report, the subsequent improvement to residential quality is also strongly supported.

Density

36 The density of the development is 4,712 habitable rooms per hectare. This is significantly above the London Plan guidance range of 650 to 1,100 habitable rooms per hectare for central sites with a public transport accessibility level of four, as set out in London Plan Policy 3.4, and represents one of the highest density proposals submitted within the Isle of Dogs and South Poplar Opportunity Area.

37 Whilst there is not an in-principle objection to high-density developments, as set out in paragraph 15 of this report, there is strategic concern regarding the need to address potential barriers to the delivery of high density housing within the Isle of Dogs. The applicant should be mindful of the strategic priority, as established in Policy 3.4, that housing output be *optimised* taking into account, amongst others, the design principles of the London Plan, and take note of paragraph 1.3.41 of the Mayor's Housing Supplementary Planning Guidance with regard to high-density development, which states that "*Such proposals must also be assessed in terms of their bearing on the capacity of existing local amenities, infrastructure and services to support the development*". It is also important, as set out in the Mayor's SPG, that high density proposals be tested rigorously with regards to their contribution to local place shaping.

38 As set out in the relevant sections of this report, the application includes the provision of education facilities, and secures the delivery of a critical connection linking Byng Street and Marsh Wall; both of these elements are strongly supported, respond positively to the developments bearing on the capacity of existing infrastructure, and address the principles of the Council's South Quay Masterplan SPD. The application also includes the provision of ground-floor publicly accessible open space and public realm; accords with strategic policies relating to residential quality; provides an appropriate mix of residential units, and an appropriate level of children's play space. In this context, the density of the proposal does not in itself raise strategic concern.

Housing quality and design

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

40 As detailed in the urban design section below, the applicant has responded positively to concerns raised previously, particularly in relation to the number of units per core, and the proportion of north-facing single-aspect units, and as such the proposal raises no strategic issues with regards to residential quality.

Children's play space and amenity

41 London Plan Policy 3.6 seeks to ensure that development proposals include suitable provision for play and recreation. Further detail is provided in the Mayor's Shaping Neighbourhoods: Play and Informal Recreation Supplementary Planning Guidance. Using the methodology within the Mayor's SPG, the applicant has calculated that the development will be home to 171 children, 63 of which are expected to be under five years old. In accordance with the Mayor's SPG, the development will need to provide, as a minimum, 10 sq.m. of door-stop play provision for every child under-five, and identify facilities for older children.

42 Within the development a series of spaces are proposed, which are intended to provide play opportunities in addition to general residential amenity, with a total of 2,026 sq.m. identified for play provision. Additional play opportunities are provided by the ground-floor public realm piazza, and through the use of the school play facilities for residents and the community outside of school hours. The applicant also intends to provide a financial contribution towards off-site provision of play space for older children.

43 In considering the previously submitted application, concern was raised with regards to the proportion and distribution of children's play space; the majority of the children are expected to reside within the western building, in light of the tenure of that element, and as such, insufficient space was allocated within that element, with overprovision provided within the eastern building. The applicant has responded positively to comments made previously and taken a more targeted approach to play provision. The western building has been revised to include a fifth-floor play deck, with mezzanine, comprising both internal and external play and amenity space, totalling 824 sq.m. The eastern building also includes communal play and amenity space in the form of play room and terraces on the first and 21st storey, totally 397 sq.m. The revised approach to children's playspace, which prioritises provision within the western building, is strongly supported and accords with London Plan policy.

Urban design

44 Good design is central to all objectives of the London Plan, and given the scale of development proposed, its design needs to be of an outstanding quality. The applicant has responded positively to concerns raised in relation to the previously submitted proposal, and the overall design of the application is supported in accordance with strategic policy.

Layout

45 The proposed layout creates a legible, safe and inviting route between Marsh Wall and Byng Street. This route is well activated on its eastern frontage by the health centre, cafe and entrance to the sky bar, and to the west by the school, community hall and the existing North Pole public house. The route opens up to become a public square in front of the school entrance and public house. This space is well defined and proportioned and will be used by a variety of users throughout the day and evening, which is welcomed. The detailed design of this space is critical to its success, particularly the need to provide pedestrian priority given the retention of Manilla Street for vehicular traffic. As detailed in paragraph 25 of this report, the applicant has responded positively to concerns raised regarding the restrained and muted design of the previous proposal, and the overall approach to this space is supported. The steps positioned adjacent to the school have also been removed.

46 Given the prominence of the existing public house within the site, and particularly within the proposed piazza, and in light of its potential impact on the success of the public realm delivered as part of this development, the previous proposal, which did not include the public house, raised serious concerns. The applicant has subsequently acquired this element and included the retention of it within this proposal, which is strongly supported; the retention of both the existing building, and its public house use, is integral to the overall success of the scheme, and it will provide a strong historical reference point, and positively act as a defining characteristic for the area.

47 At the northern end of this route the landscape steps and ramps up to Marsh Wall level. The approach of splitting the hotel and cafe floor level to create a mezzanine within the tower that seeks to address this changing level is welcomed. The route itself is generous, and has been increased in width and prominence through the pre-planning application process. The concerns raised previously regarding the dominance of planting structures on the staircase have been addressed by a simplifying of the landscaping within this element, which is welcomed.

48 At pre-application stage, and in assessing the previously submitted application, GLA officers emphasised the importance of not undermining the quality of Byng Street with servicing and back of house uses, and raised concerns with regards to the dominance of the substations at ground floor. In response to these concerns, the applicant has engaged with UKPN regarding the relocation of both substations to basement; this increases the Byng Street active frontage by an additional eight metres, and is a welcomed revision. The Manilla Street frontage has also been significantly improved, and in addition to the removal of the substation, now includes a more substantial second school entrance, providing additional levels of activity. Whilst this frontage includes the single-storey garage element that forms part of the urban block but sits outside of this proposal, through the use of new screen to Manilla Street, and in light of the public house refurbishment, and the overall improvements to the Manilla Street frontage, this element will not significantly undermine the quality of this route and does not raise any strategic concern. As the garage fronts the piazza, similar high-quality screening is proposed.

49 The quality of the frontage along Marsh Wall is welcomed. This is animated by the residential and hotel lobbies, which both create a simple and strong building line contributing to transforming the character of Marsh Wall into a good quality urban street, in accordance with the principles of the South Quay Masterplan SPD. The inclusion of a combined taxi and coach drop-off area intended to serve the hotel raised concerns previously and has been removed from this revised proposal; the canopy has also been revised, which is welcomed.

Residential quality – eastern building

50 In considering the previously submitted application, significant concern was raised with regards to residential quality, particularly in relation to the proportion of north-facing single-aspect units and the number of units per core. In response to the concerns raised previously, the number of studio units within the eastern building has been significantly reduced; as such 51% of floors have eight units per floor, with the remaining floors having no more than nine units; the proportion of single-aspect north-facing units has been reduced to 6%, and the applicant has also committed to providing 2.6 metre clear floor-to-ceiling heights. The revisions address the concerns raised previously, all units accord with London Plan space standards, and as such, the eastern building is acceptable with regards to residential quality.

Residential quality – western building

51 The residential quality of the western block is high, with no more than five units on each floor, and a very high proportion of dual-aspect units, which is strongly supported. The applicant has confirmed that all units meet the London Plan minimums space standards and have a 2.6 metre clear floor to ceiling heights. Consequently, the western building is acceptable with regards to residential quality.

Architectural treatment

52 The appearance of the development is characterised by the distinctive profile of the eastern block and its glass and metal elevations. The hotel and western block follow the same language. Whilst this approach is generally supported, the quality of detailing and specification of materials will be critical to the appearance of the scheme. The Council is therefore strongly encouraged to secure the retention of the architects during detailed design phases, in addition to utilising appropriate conditions securing design detail and materials.

Height and strategic views

53 The proposed development is high, at 65-storeys (up to 217.50 metres AOD). Whilst this is significantly taller than the immediate contextual height, in particular the buildings to the west and south, given the rapidly changing context of the site, its proximity to the Canary Wharf tall building cluster, and its high accessibility, the height does not raise any strategic concern.

54 As set out in paragraph nine of this report, the buildings lies in a number of strategic views, as identified in the Mayor's London View Management Framework. The applicant has submitted a townscape, visual and built heritage impact assessment, which assess the impact of the development on all the views identified and listed in paragraph nine, in addition to an assessment of the impact on the setting of the Maritime Greenwich World Heritage Site. This assessment demonstrates that for all strategic views, whilst the proposed buildings are higher than the existing context, they are in keeping with the height of proposed buildings within the vicinity of the site, and will form part of an emerging cluster.

55 The proposals' appearance in strategic view 5A.1 from Greenwich Park is particularly prominent. Guidance within the London View Management Framework notes that the existing cluster of tall buildings adds layering and depth to the understanding of the panorama, and states that the composition of the view would benefit from further, incremental consolidation of the tall buildings. The proposed building lies within the recognisable cluster of Canary Wharf, and to the left of axial view through Queen's House, will be identifiable as falling within the existing and emerging cluster, and therefore does not raise strategic concern.

56 The proposal also falls within the wider setting of the Maritime Greenwich World Heritage Site. London Plan Policy 7.10 'World Heritage Sites' states that development should not cause adverse impacts on World Heritage Sites or their settings, and, in particular, should not compromise the ability to appreciate their outstanding universal value, integrity, authenticity or significance. The applicant's townscape, visual and built heritage impact assessment illustrates the proposal will become part of the developing cluster of consented and proposed buildings on the Isle of Dogs, and does not raise any strategic concern. The building will not harm the setting of listed buildings within the World Heritage Site, or of listed buildings within Canary Wharf. The height of the development does not therefore raise strategic concern.

Inclusive design

57 In accordance with London Plan Policy 3.8, the applicant has confirmed that all of the residential units will meet Lifetime Homes standards, and that 10% of the units will be designed to be fully adaptable and adjustable to wheelchair users. As set out in the Mayor's Housing Standards Policy Transition Statement, the Council should secure compliance with building regulations M4 (2) and M4 (3) by condition. Furthermore, in accordance with London Plan Policy 4.5, the Council should also secure the provision of 10% wheelchair accessible rooms within the hotel, and the submission of an access management plan.

Blue Ribbon Network and flooding

58 The site is located within flood zone three. The applicant has taken due consideration of flood risk and consequently the proposals accord with London Plan policies 5.12 and 5.13. Nevertheless, the applicant should follow good practice and enclose any essential building utilities within a flood-proof room, or enclosure. This will help with the overall resilience of the building in any flood event, enabling occupants to remain safe and comfortable within the building.

59 The applicant's flood risk assessment states that the development will reduce surface water run-off by at least a 50% in comparison to the existing site, to be achieved by the use of attenuation tanks. Whilst this approach is acceptable, the applicant should consider the use of green, brown or blue roofs, rainwater harvesting, or direct discharge to the dock as alternative and generally more sustainable options, which would remove the need for attenuation tanks.

Climate change - adaptation

60 The proposal includes a number of measures in response to strategic policies regarding climate change adaptation, which are welcomed. Measures proposed include sustainable drainage measures, use of low energy lighting and energy efficient appliances, smart meters, high levels of insulation, low water use sanitary-ware and fittings, and biodiverse planting.

Climate change - mitigation

61 The applicant has broadly followed the London Plan energy hierarchy to reduce carbon dioxide emissions. However, further revisions and additional information is required before the strategy can be assessed, and compliance with the London Plan verified.

Energy efficiency

62 A range of passive design features, and demand reduction measures, have been included to reduce the carbon dioxide emissions of the development. Both air permeability and heat loss parameters will be improved beyond the minimum backstop values required by building regulations. Other features include reduced mechanical ventilation with heat recovery and low energy lighting. Sample DER and TER output sheets should be provided including energy efficiency measures alone in order to verify the savings reported.

63 The applicant is proposing a high performance curtain wall system, and has provided preliminary assessments to demonstrate that the performance level reported will be achievable; however, the SAP sheets submitted note that the performance values used in the modelling differed from the values reported within the energy statement. The applicant should provide details of the assumptions and calculation methodologies used to input the curtain wall performance values into SAP in order to verify the performance levels.

64 The demand for cooling will be minimised through external shading and solar control glazing. The applicant has undertaken a dynamic overheating study, using CIBSE TM 52 and CIBSE Guide A methodologies, for both buildings and for dwellings in a number of orientations; the study concludes that the CIBSE criteria will be met for all areas without reliance on mechanical cooling.

District heating and renewables

65 The application site lies within the Barkentine district heating network. In accordance with London Plan climate change policies, connection to the network should be prioritised in the first instance, and updated evidence of correspondence should be provided to demonstrate that a connection has been robustly investigated

66 The applicant is proposing to install a site-wide heat-network, with gas fired combined heat and power unit as the lead heat source, to be served by a single energy centre. A schematic demonstrating the heat network connecting all apartments and non-domestic building uses has been provided; however, the applicant should also provide a layout drawing of the energy centre, which should include reference to its floor area. At this stage the applicant anticipates that the installed capacity of the CHP unit will be either 400kWe or 600kWe; the applicant should confirm which engine the current calculations are based upon.

67 The applicant has investigated the feasibility of a range of renewable energy technologies and is proposing to install solar photovoltaic panels on the roof of the western building. A roof plan demonstrative the location of the panels has been provided.

Summary

68 Overall the measures proposed result in a 41% reduction in regulated carbon dioxide emissions compared to a 2013 Building Regulations compliant development, which accords with London Plan emission targets. The applicant should fully address all comments made above, regarding energy efficiency, overheating, district heating and combined heat and power, before the strategy can be fully assessed, and compliance with the London Plan verified.

Transport

Car parking, deliveries and access

69 The proposal includes 38 car spaces, including eleven blue badge spaces, equating to a residential parking ratio of 0.03. TfL supports this restrained approach as it will help to minimise additional vehicular trips in this area; however, the applicant should confirm that the distribution of spaces across the western and eastern blocks appropriately responds to the provision of wheelchair accessible homes. The applicant has committed to meeting London Plan standards on electric vehicle charging points, which is welcomed. The proposals should be subject to a permit free agreement, secured through the section 106 agreement.

70 The applicant proposes to share an existing coach bay with the adjacent 40 Marsh Wall development. Whilst this approach is acceptable, the applicant should explore how the frequency of coach trips for this development will interact with the frequency of coach trips expected at 40 Marsh Wall. In doing this, the applicant should outline what would happen should both hotels require the coach bay simultaneously.

Public transport

71 The cumulative impact of bus trips from this development, and others nearby, will require additional bus capacity to be provided, as many routes in this area are already at capacity. A contribution of £200,000 is therefore requested to be secured through the s106 agreement for enhancements to bus services.

Cycling and walking

72 A total of 1,148 cycle parking spaces are proposed, which is welcomed in accordance with London Plan standards; however, the applicant should ensure that the access and design of the storage facilities comply fully with London Cycle Design Standards. Long-stay residential parking is suitably located across the site; however, the applicant should ensure that the split of short-stay parking is appropriately distributed between buildings, in addition to providing an additional four short-stay spaces for the school. The applicant should also explore opportunities for the provision of visitor parking within the public realm with TfL. Finally, the Council should secure the submission of a parking management plan to outline how different uses on-site will maintain security with shared storage space.

73 The applicant has undertaken a PERS audit, which is welcomed. The provision of a route linking Marsh Wall and Manilla Street is strongly supported and should be secured by the Council through either section 106 or section 278 agreement.

74 The Council should also ensure that appropriate CIL funding is allocated towards the delivery of additional crossing points across South Dock.

Travel planning

75 The applicant has provided a framework construction logistics plan; further detail and discussion regarding this element is required to address outstanding concerns. A final and agreed version of the construction logistics plan, together with a delivery and servicing plan, and a travel plan, should be appropriately secured by the Council.

Community Infrastructure Planning

76 The site is located within the Isle of Dogs charging area where section 106 contributions for Crossrail will be sought in accordance with London Plan Policy 6.5 and the Mayor's guidance 'Use of planning obligations in the funding of Crossrail, and the Mayoral Community Infrastructure Levy' SPG (2013). A total contribution of £607,926 is generated by this development.

77 The Mayor has also introduced a London-wide Community Infrastructure Levy (CIL) to help implement the London Plan, particularly policies 6.5 and 8.3 toward the funding of Crossrail. The rate for the borough of Tower Hamlets is £35 per square metre. The applicant should note that the Mayor's CIL charge will be treated as a credit towards the section 106 liability referred to above and therefore only the larger of the two amounts will normally be sought. Notwithstanding this, the Council must identify the full Crossrail sum within the section 106 agreement.

Summary

78 In summary, a financial contribution towards improving bus capacity is required, and further details relating to car and cycle parking and the construction logistics plan should be submitted in discussion with TfL. The Council should secure the financial contribution towards bus capacity, in addition to the final agreed car park management plan, travel plan, construction logistics plan and delivery and servicing plan through the section 106 agreement and/or conditions, as appropriate.

Local planning authority's position

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

Legal considerations

80 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

81 There are no financial considerations at this stage.

Conclusion

82 London Plan policies on Opportunity Areas, housing, urban design, inclusive design, climate change, and transport are relevant to this application. The principle of the housing-led mixed-use redevelopment of this site is strongly supported. A number of outstanding concerns are raised with regards to housing, climate change and transport:

- **Housing:** it is not possible at this stage to determine whether the proposal provides the maximum reasonable amount of affordable housing, in accordance with London Plan Policy 3.12.
- **Climate change mitigation:** the energy strategy does not fully accord with London Plan policies 5.2, 5.6 and 5.9. Further information regarding energy efficiency, overheating, connection to the Barkentine heat network and the site-wide heat network, and the combined heat and power system is required. The final agreed energy strategy should be appropriately secured by the Council.
- **Transport:** in accordance with London Plan policies 6.1, 6.2, 6.4, 6.7, 6.9 and 6.10 the applicant is required to provide a financial contribution towards improving bus capacity. Further details relating to car and cycle parking and the construction logistics plan should also be submitted in discussion with TfL. The Council should secure the financial contribution towards bus capacity, in addition to the final agreed car park management plan, travel plan, construction logistics plan and delivery and servicing plan through the section 106 agreement and/or conditions, as appropriate.