

28 January 2016

Duncan House, Stratford High Street, E15**in the London Borough of Newham, (London Legacy Development Corporation)****planning application no. 15/00598/FUL****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

Full planning application to provide 510 (sui-generis) student bedspaces, 44 (C3) residential units, 2,627 sq.m. (GIA) of (D1/B1) floorspace, and 634 sq.m. (GIA) of (B1c) artist floorspace together with associated landscaping and car parking.

The applicant

The applicant is **Watkins Jones Group** and the architect is **DGA Architects**.

Strategic issues

The application raises strategic planning issues in respect of **mix of uses**, the **2012 Games and their Legacy**, **housing** and **affordable housing**, **urban design**, **inclusive design**, **sustainable development** and **transport**.

Recommendation

That the London Legacy Development Corporation be advised that the application does not comply with the London Plan, for the reasons set out in paragraph 83 of this report; but that the possible remedies set out in this paragraph could address these deficiencies. The application does not need to be referred back to the Mayor if the Corporation resolves to refuse permission, but it must be referred back if the Corporation resolves to grant permission.

Context

1 On the 18 December 2015 the Mayor of London received documents from the London Legacy Development Corporation notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor has until the 28 January 2016 to provide the Corporation with a statement setting out whether he considers that the application complies with the London Plan and his reasons for taking that view. The Mayor may also make other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under Categories 1B.1c (Development outside central London and with a total floorspace of more than 15,000 square metres), and 1C.1c (a building more than 30 metres high outside the City of London) of the Schedule to the Order 2008.

3 Once the London Legacy Development Corporation has resolved to determine the application, it is required to refer it back to the Mayor for his decision, as to whether to direct refusal or allow the Corporation to determine it itself, unless otherwise advised. In this instance if the Corporation resolves to refuse permission it need not refer the application back to the Mayor.

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 is approximately 0.41ha in size and contains Duncan House, a two storey building currently in education use. The site also includes a surface car park for approximately 34 cars and an area used for ancillary waste and recycling. It is located within the London Borough of Newham but is within the administrative boundary of London Legacy Development Corporation (LLDC) which is therefore the Local Planning Authority for the planning application.

6 The site itself is broadly rectangular and orientated northeast-southwest, with the existing building located at the southern end of the site and carparking to its north. It fronts Stratford High Street to the east and is bounded to the southwest by Ward Road, by Lett Road to the northeast and Jupp Road to west. The site is also in close proximity to 304-312 Stratford High Street where *The Collective* have submitted a planning application for a large mixed use sui-generis hostel, apart hotel and workshop redevelopment which is currently being considered by the LLDC.

7 Stratford High Street (A118) contains a variety of buildings in terms of age, style, height and use, and is characterised by a series of tall buildings which peak at 43 storeys at its southern end, (the Halo Tower). This road forms part of the Strategic Road Network (SRN), and the nearest section of the Transport for London Road Network (TLRN) is the A11/A12 Bow Roundabout, 1.2km south west of the site.

8 The site is adjacent to London Underground Jubilee and Dockland Light Railway lines and the site benefits from excellent transport links, with Stratford High Street DLR station located 150m north east the site and Stratford Regional station located 450m north of the site. Stratford Regional station is a major public transport interchange, served by the Central and Jubilee lines on the London Underground, London Overground, two branches of DLR and National Rail services to north east London and East Anglia. The station will also be served by Crossrail services in the future. Stratford International station is located 1km away and is served by High Speed train services from London St Pancras to Kent.

9 Four bus services and one night bus service are available from the nearest bus stops (on Stratford High Street), and a total of 18 services and three night bus services stop at either or both of the bus stations in Stratford. As such, the site records a high public transport accessibility level (PTAL) of 6b on a scale of 1-6, where 6 is the highest.

Details of the proposal

10 The application proposes the demolition of existing buildings on the site and their replacement with a mixed use redevelopment comprising student housing (sui-generis), residential (C3), education (mixed D1/B1), and artist workspace (B1c), in a predominately 4 storey podium building (stepping up to eight storeys in the south west corner of the site), and a series of linked towers rising to a maximum height of 103.65m AOD (33 storeys).

11 Specifically it proposes the following:

- 2,627sq.m. (GIA) of hybrid B1/D1 accommodation potentially to be occupied by the *Kensington College of Business*;
- 510 (sui-generis) student bed spaces (including single occupancy studios and multiple occupancy apartments), potentially to be owned and managed by the *University of London*;
- 44 (C3) residential dwellings comprising a mix of 1, 2 and 3 bedroom units;
- 634 sq.m. (GIA) of B1 artist studio space potentially to be managed by *Acme* - an established workspace provider which owns and manages a number of similar schemes across London.

Planning history

12 A planning application for a 36 storey tower to provide 276 flats 4,010 sq.m. of D1 floorspace, and 705 sq.m. of retail floorspace was submitted to the London Thames Gateway Development Corporation in October 2010 which the Mayor considered at Stage 1 on the 30 November 2010 (Mayoral planning report PDU/2711/01). The Mayor was content with the proposed land uses but raised concerns in respect of the level of affordable housing and the proposed approach to children's play space, urban design, inclusive design, energy and transport. It is understood that this application was withdrawn in February 2012 and it was not referred back to the Mayor for a Stage 2 decision.

13 Two pre-planning application meetings were subsequently held between the current owners of the site and GLA officers on the 2 July 2015 and the 24 September 2015 where the following matters were discussed and associated advice offered.

Land uses

14 The introduction of permanent (C3) and sui-generis student housing was welcomed as it would help achieve the Mayor's strategic targets for each form of housing, though it was confirmed that the C3 element would be expected to deliver a mix of unit sizes and tenures to accord with local and strategic policy. The new "like for like" education floorspace proposed at that time was also supported; but as set out below, the application now proposes a hybrid D1/B1 use which could result in no education floorspace at all being retained. The new artist workspace was also supported, but it was suggested that it be designed to accommodate B1c uses and that any affordable component be clearly defined and secured as such through any S106 agreement.

Housing

15 Affordable housing discussions were very limited, but the applicant was reminded that the London Plan requires new housing schemes to deliver the maximum reasonable level of affordable housing taking account of funding and viability and that the Plan also emphasises the delivery of affordable family accommodation.

16 Officers also advised that student accommodation should be secured by planning agreement or condition, and that if it were not tied to a specific academic institution, then affordable student accommodation should be included. The need to supply a density calculation in accordance with the London Plan's methodology was also stressed as was the need to comply with relevant play space and housing quality standards.

Urban design

17 Officers advised that a 30 storey building in this location did not present a strategic concern given its proximity to Stratford Metropolitan Centre, its high transport accessibility and the changing context of the area, but advised that for a building of this height and scale to be acceptable to the Mayor, it would need to be of outstanding design quality, contribute significantly to the quality of the surrounding area, and help create a more significant public space at this location - which as well as improving the scheme's relationship to the historic pub opposite the site, would provide a better focal point for this part of Stratford High Street.

18 Officers were also concerned with the amount of inactive frontages proposed at that time and it was suggested that each edge had at least one primary entrance, and that back of house uses such as cycle and recycling stores be more dispersed so as not to dominate any street edge. The scheme's general residential quality was supported as was the limited number of units served by each core - as this would ensure a high proportion of dual aspect units and strong ownership of shared circulation spaces.

Inclusive design

19 There was no detailed inclusive design discussion, but it was noted that as the site is generally level, there should be no particular barriers to providing a fully inclusive living and working environment. The applicant was also advised to clearly design features to ensure that any shared surfaces would be safe and usable for disabled people and children and include segregated areas that vehicles would be excluded from to allow such safe use.

20 Finally, the applicant was advised to work with the LLDC and Newham Council to ensure that the mix of wheelchair accessible units would meet locally identified need, agree to market the new housing to disabled and older people's organisations and demonstrate adequate and managed blue badge parking.

Air quality, noise and energy

21 The applicant was advised to take account of potential traffic noise and air quality impacts arising from the site's location on Stratford High Street in accordance with London Plan policies 7.14 (Air quality) and 7.15 (Noise), and demonstrate full compliance with London Plan energy policies.

Transport

22 Advice on car and cycle parking, transport assessment, trip generation, connectivity and construction logistics, delivery and servicing and student management plans was offered to help the applicant demonstrate full compliance with relevant London Plan transport policies.

Strategic planning issues and relevant policies and guidance

23 The relevant issues and corresponding policies are as follows:

- Proposed uses *London Plan;*
- The 2012 Games & Legacy *London Plan;*
- Housing *London Plan; Housing SPG; Draft Interim Housing SPG; Housing Strategy; Shaping Neighbourhoods: Children And Young People's Play And Informal Recreation SPG;*
- Urban design *London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG;*
- Inclusive design *London Plan; Accessible London: achieving an inclusive environment SPG;*
- Sustainable development *London Plan; Sustainable Design and Construction SPG; Mayor's Climate Change Adaptation Strategy; Mayor's Climate Change Mitigation and Energy Strategy; Mayor's Water Strategy;*
- Transport *London Plan; the Mayor's Transport Strategy; Land for Industry and Transport SPG.*

24 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 2015 LLDC Local Plan and the 2015 London Plan.

25 The following are also relevant material considerations:

- The National Planning Policy Framework and associated Technical Guide.
- The Mayor's Olympic Legacy Supplementary Planning Guidance, (OLSPG), July 2012.
- Draft Minor Alterations to the London Plan (MALP), May 2015.

Principle of development

26 A mixed use redevelopment of this site to provide C3 and student housing, B1c workspace and D1 educational uses could be supported in strategic planning terms subject to the satisfactory resolution of the detailed matters set out in this report and clarification of the net and gross floorspaces for each of the proposed uses. The currently proposed hybrid B1/D1 use would however be contrary to London Plan policy 3.18 (Education facilities) as it could result in no educational floorspace being reprovided. Clarification is also needed on whether the proposed B1c floorspace would be let at market or subsidised rents.

The 2012 Games and their legacy

27 The London Plan sets out the Mayor's vision for the sustainable development of the capital and paragraph 1.54 confirms that he will apply the Plan's objectives and principles to the new and existing neighbourhoods in the Lea Valley associated with the 2012 Games. Policy 1.1 confirms that the development of east London will be a priority for the Mayor and reinforces his objective to promote social and economic convergence between east London and other parts of the city.

28 Policy 2.4 of the London Plan commits the Mayor's to work with and through the LLDC to promote and deliver physical social economic and environmental change within east London and to close the deprivation gap between the Olympic Host Boroughs and the rest of London. This is known as convergence.

29 The application site is within the area covered by the Mayor's OLSPG, which provides advice on how he wishes his strategic planning priorities to be applied to the area it covers. The OLSPG sets out an overall vision for the area, which includes making it one of the best places to live and work in London, improving connectivity across and into the new Queen Elizabeth Olympic Park, and creating new family housing and schools. It then includes a series of development principles that are expected to be applied to planning applications and includes more detailed guidance for each of its 5 sub areas.

30 The OLSPG's core development principle addresses convergence and states that planning applications in the OLSPG area should demonstrate how they will help close the deprivation gap between the Olympic host boroughs and the rest of London and that one way this can be done is for planning applications in the OLSPG area that propose more than 100 residential units or 1,000 sq.m. of new floorspace or uses to include a statement setting out how they will help achieve convergence outcomes. The applicant has submitted such a statement which is welcomed and supported.

Housing

Introduction

31 London Plan policies 3.3 and 3.4 recognise the need for new housing in London and table 3.1 of the London Plan sets an annual target of 1,471 new homes for the LLDC in the period 2015 – 2025. The proposed C3 residential element would assist the LLDC achieve this target and is therefore welcomed in principle.

Housing mix

32 The applicant is proposing the following housing mix:

Unit size	1 bed	2 bed	3 bed	Total
No of units	15 (34%)	23 (52%)	6 (14%)	44

33 This mix is acceptable given the site's location and the scheme's form and mix of uses.

Affordable housing

34 London Plan policy 3.12 requires local planning authorities to seek the maximum reasonable amount of affordable housing when negotiating on individual private residential and mixed-use schemes and to have regard to local targets, and London Plan policy 3.11 which looks for 60% of new affordable housing to be for social and affordable rent; and 40% for intermediate rent or sale. Policy 3.12 is supported by paragraph 3.71, which urges local planning authorities to take account of economic viability and the most effective use of private and public investment when estimating the appropriate amount of affordable provision.

35 Pre-application discussions relating to affordable housing were limited, but the applicant is currently suggesting that 15 of its proposed units would be affordable, which would represent 34% of the total housing units - though the nature of that affordability has not been confirmed, nor has it confirmed proposed tenures or unit mix. The applicant has however submitted a viability report to the LLDC which contends that the scheme: "would result in residual land value below what would be considered an appropriate site value for the landowner in accordance with published guidance on financial viability in planning process whilst allowing for an appropriate developers profit for this type of development".

36 The applicant should therefore confirm the affordability and nature of the affordable housing it is proposing and confirm if it has held talks with an affordable housing provider. The LLDC should then complete its assessment of the applicant's viability report to test whether this is a reasonable conclusion and hence whether the scheme as currently put forward would provide the maximum reasonable level of affordable housing it could. The LLDC's assessment should also explore the implications of any increase in values and whether the scheme would be able to make an increased affordable housing contribution if this were to happen. These assessments should be shared with the GLA before the scheme is referred back to the Mayor at Stage 2.

Student housing

37 The applicant has advised that it anticipates the *University of London* to take the student accommodation it is proposing - though this is not yet assured. The applicant is therefore strongly encouraged to conclude negotiations with the University so that the proposed student units could be linked to it through a S106 agreement. If agreement is not reached, (or agreement reached with an alternative education institution), an element of affordable student accommodation should be provided in line with paragraph 3.53B of the London Plan.

Education (D1) use

38 The site currently contains some 4,353 sq.m. (GIA) of D1 education floorspace which the applicant proposes to replace with 2,626 sq.m. (GIA) of new hybrid D1/B1 floorspace. This represents a minimum loss of 1,727 sq.m. of D1 education floorspace - and by seeking planning permission for a hybrid D1/B1 use, could result in no D1 floorspace at all being retained or reprovided. These figures are also internal rather than external areas, hence the actual (planning) loss of D1 educational floorspace would be significantly higher.

39 London Plan policy 3.18 (Education facilities) confirms that development proposals which would result in the net loss of education facilities should be resisted unless it can be demonstrated that there is no ongoing or future demand for such provision. No such argument or evidence has been put forward by the applicant; and whilst GLA officers accept that the replacement of a larger older, relatively poor quality education facility by a new smaller, more efficient, purpose built education facility might be acceptable in policy terms, a planning permission that could lead to the total loss of an education use in the context of increased strategic need for such facilities is not supported.

40 The applicant is therefore advised to; a) clarify the gross and net floorspaces of the current and proposed educational uses; and b) amend its application to remove the hybrid D1/B1 element to ensure that all the new education accommodation would be D1 floorspace, which would allow ancillary B1 accommodation - as is the case with similar higher education buildings.

B1 (artists) workspace

41 The introduction of B1c floorspace designed for use by artists is supported but the applicant and the LLDC should clarify whether the proposed floorspace would be let at market or subsidised rents, how that has been accounted for within the submitted viability study, and if subsidised, how it would be secured and maintained as such within any S106 agreement.

Urban design

42 As set out above, officers advised at pre-application stage that a 30 storey building in this location did not present a strategic concern given its proximity to Stratford Metropolitan Centre, its high transport accessibility, and the changing context of the area; but advised that for a building of this height and scale to be acceptable to the Mayor, it would need to be of outstanding design quality, contribute significantly to the quality of the surrounding area and help create a more significant public space at this location – which as well as improving the scheme’s relationship to the historic pub facing the site, would provide a better focal point for this part of Stratford High Street. Officers also expressed concern over the amount of inactive frontages proposed at that time, and it was suggested that each edge have at least one primary entrance and that back of house uses such as cycle and recycling stores be more dispersed so as not to dominate any street frontage.

43 GLA officers remain broadly comfortable with the scheme’s height and form from a strategic perspective – notwithstanding that a further 3 storeys have been added. Officers also welcome attempts to improve the scheme’s primary public frontages – for example, the street elevation to Stratford High Street has been reconfigured and now provides a better public interface. Changes have also been made to servicing and cycle parking arrangements and the location and design of the proposed lower level residential units has been improved. These changes are welcomed and result in better designed scheme.

44 Officers are however concerned that changes to the new area of public realm fronting Lett Road are more limited and that the street frontage to Jupp Road is still overly dominated by inactive uses and servicing. The applicant has also not confirmed which elements of the proposed public realm it would be able to deliver, those which would have to be delivered by others, and those that would need agreement with third parties. At the moment therefore it is not possible to understand how much of the public realm improvements the plans show are capable of delivery by the applicant, nor how this has been dealt with the submitted viability report. These matters therefore remain outstanding and further efforts should be made to address these concerns in order to demonstrate full compliance with relevant London Plan policies.

Housing standards and quality

45 One of the Mayor’s key planning priority to improve the quality and design of new housing and to ensure it is fit for purpose, comfortable, accessible and sufficiently spacious – as set out in section 2.1.6 of his Draft Interim Housing SPG.

46 The scheme has a relatively low number of units served by each core (and therefore ensuring a high proportion of dual aspect units and strong ownership of shared circulation spaces) and the applicant has now produced material that references its proposals to the Mayor’s housing standards which shows broad compliance. This is welcomed and supported.

Children’s play space

47 Officers stressed the need at pre-application stage for the applicant to show that playspace would comply with the Mayor’s children’s play space standards. In response, the applicant has proposed 50 sq.m. of rooftop play space, the details of which would be required by planning condition. This figure should be reviewed once housing tenures, numbers and mix are settled, and a planning condition requiring a play strategy to be prepared in accordance with the Mayor’s *Shaping Neighbourhoods: Play and Informal Recreation SPG* should be required by condition if the LLDC resolves to grant permission for the scheme.

Inclusive design

48 There was no detailed inclusive design discussion at the pre-application stage, but it was noted that as the site is generally level, there should be no particular barrier to providing a fully inclusive living and working environment. The need for any shared surfaces to include design features that would ensure that they would be safe and usable for disabled people and children and to identify and include segregated areas that vehicles would be excluded was stressed, and the applicant was advised to work with the LLDC and Newham Council to ensure that the mix of wheelchair accessible units would meet locally identified need. Specific marketing to the disability community and to older people's organisations to help ensure that people that would benefit from the units accessible design was also suggested.

49 It was also confirmed that the applicant's design and access statement should demonstrate that adequate provision of blue badge parking bays would be made for employees, visitors and residents to each of the proposed uses in line with London Plan policy 6.13, and Table 6.2. A managed approach to the provision of disabled parking was also suggested.

50 There are however some concerns with the current submission in terms of inclusive design, and a number of issues require further clarification - as for a development of this size, the information contained in the 'access' component of the design and access statement is quite sparse and should be urgently revisited.

51 For example the applicant should clearly demonstrate on plan where the 10% of M4(3) accessible units are to be provided which should be split across tenures and units sizes to ensure that disabled people have a choice of unit afforded to them unless LLDC or Newham local policy demonstrates a clear need for certain unit sizes for wheelchair users.

52 Plans should also be provided to demonstrate how any wheelchair adaptable units could become wheelchair accessible units if the need arises. An Access Management Plan should be submitted to ensure that the accessible parking needs of both residents and students would be met within the 22 car parking spaces to be provided - on top of any requirement for the education facility and the artist studios.

53 Further information should also be provided on the design of the landscaping and the public realm, as this is crucial to how inclusive the development would be. The proposals should also ensure that routes from the public transport facilities to the new homes and facilities are legible and that wayfinding is easy, with clearly identified entrances at street level. The applicant should also show how disabled people would access each part of the building safely and include details of levels, gradients, widths and surface materials. Level changes on these routes and, to and within the residential courtyards should also be clarified. The proposed use of 'shared surfaces' is of particular concern, and as advised at the pre-application stage, the applicant should provide full details of segregation and clarify how pedestrians would be alerted to the fact they were entering or leaving a shared surface area and how a 'shoreline' to navigate the area is to be provided for those with a visual impairment. The application might also benefit from advice from the LLDC's Built Environment Access Panel (BEAP).

54 These matters should be fully addressed before the application is referred back to the Mayor at Stage 2 and appropriately conditioned in any approval and a planning condition requiring a detailed inclusive design strategy to be prepared in accordance with the Mayor's *Accessible London: achieving an inclusive environment SPG* should be required by condition if the LLDC resolves to grant permission for the scheme.

Air quality and noise

55 At pre-application stage the applicant was advised that it should take account of the potential impacts of traffic noise and air quality arising from the site's location on Stratford High Street as its proposals developed in accordance with London Plan policies 7.14 (Air quality) and 7.15 (Noise). Material has been submitted to address these matters which should be fully assessed by the LLDC.

Flood risk

56 A Flood Risk Assessment (FRA) has been prepared by Tier Consult Ltd. This confirms that a small portion of the site is within flood risk zone 3a. This FRA confirms that this is well protected by existing flood defences. The FRA also confirms that a number of mitigation measures will be put in place to reduce the impact of any flooding. These include raising electrical circuits and other utilities 450mm above finished floor levels. Given the level of risk present, this is considered to be an acceptable approach to the level of risk present at the site and therefore the proposals are acceptable in terms of London Plan policy 5.12.

Sustainable drainage

57 Although the site itself is not at risk of surface water flooding, there are surface water flood risks in the wider local area. Therefore the application of London Plan policy 5.13 will be an important aspect of this proposal. The FRA also outlines the drainage strategy for the site. The principle of the drainage strategy is that run-off from all storms up to 1 in 30 year will be attenuated on site in below ground attenuation tanks/geocellular units/oversize pipes and that all storms up to the 1 in 100 year will be attenuated on site by use of temporary storage in the public realm (also known as design for exceedance).

58 This approach is acceptable in terms of London Plan policy 5.13 and indeed given the nature and location of the site could represent good practice. However, the FRA states that the run-off rate from the site will be limited to 20 litres per second (l/s). For a relatively small site of less than 0.5ha this is quite a high discharge rate. Closer examination of the run-off calculations shows that the run-off volume has been calculated on the basis that the whole site is impermeable. This is inaccurate as the proposals will introduce significant areas of ground level landscaping and green roofs, both of which will act to slow down and reduce total run-off.

59 The maximum discharge rate for this site should be between 5-10 l/s in order for the SUDS measures to be an effective attenuation mechanism for surface water from this site. Therefore the proposals do not comply with London Plan policy 5.13 and the applicant is requested to re-examine this aspect of the proposals prior to any Stage 2 referral to the Mayor.

Energy

Overview

60 The applicant has broadly followed the energy hierarchy. Sufficient information has been provided to understand the proposals as a whole. Further revisions and information are required before the proposals can be considered acceptable and the carbon dioxide savings verified.

Energy efficiency standards

61 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 improved beyond the minimum backstop values required by building regulations. Other features include low energy lighting. The demand for cooling will be minimised through solar control glazing. The applicant has stated that modelling has been undertaken using a dynamic simulation tool to assess the overheating risk. The applicant should provide the results of the analysis in order to demonstrate that the overheating risk has been sufficiently minimised.

62 Based on the information provided, the proposed development does not appear to achieve any carbon savings from energy efficiency alone compared to a 2013 Building Regulations compliant development. The applicant should model additional energy efficiency measures and commit to the development exceeding 2013 Building Regulations compliance through energy efficiency alone.

District heating

63 The applicant has carried out an investigation and there are no existing district heating networks within the vicinity of the proposed development. The applicant has identified that the site is located within the vicinity of a potential network extension from the Olympic Park district heating network. Connection opportunities have been discussed with the network operator, however the operator does not consider extension of the network to the development site viable at this time. The operator has requested that the development is designed to allow future connection to the district heating network and this approach has been confirmed by the applicant.

64 The applicant is proposing to install a site heat network. However, the applicant should confirm that all apartments and non-domestic building uses will be connected to the site heat network. A drawing showing the route of the heat network linking all buildings on the site should be provided. The site heat network will be supplied from a single energy centre. Further information on the floor area and location of the energy centre should be provided

Combined Heat and Power (CHP)

65 The applicant is proposing to install a gas fired CHP unit as the lead heat source for the site heat network. The CHP is sized to provide the domestic hot water load, as well as a proportion of the space heating. Detailed information should be provided in the energy assessment including the size of the engine proposed (kWe/kWth), heating and electrical efficiencies (gross efficiencies should be used), thermal store provision and suitable monthly demand profiles for heating, cooling and electrical loads. The applicant should also provide information on the management arrangements proposed for the system, including anticipated costs. A reduction in regulated CO₂ emissions of 157 tonnes per annum (42%) will be achieved through this second part of the energy hierarchy.

Renewable energy technologies

66 The applicant has investigated the feasibility of a range of renewable energy technologies and is proposing to install air source heat pumps (ASHP) for heating within some non-domestic areas where cooling is required. The applicant should confirm which areas will be provided with ASHP. The applicant should note that in this particular case ASHP would only be acceptable for small commercial/retail units (i.e. total area <500 sq.m.). If the units are larger or have significant heat loads then the units should be, in line with the energy hierarchy, connected to the heat network to optimise the CHP. A reduction in regulated CO₂ emissions of 9 tonnes per annum (2%) will be achieved through this third element of the energy hierarchy.

Overall carbon savings

67 A reduction of 134 tonnes of CO₂ per year in regulated emissions compared to a 2013 Building Regulations compliant development is expected, equivalent to an overall saving of 36%. The carbon dioxide savings exceed the target set within policy 5.2 of the London Plan. However, the comments above should be addressed before compliance with London Plan energy policy can be verified.

Transport

Background

68 The site is located within the Stratford sub-area of the Olympic Legacy Supplementary Planning Guidance (OLSPG) and the application was the subject of detailed comments provided by TfL to LLDC on 24 December 2015.

Trip generation and impact

69 Given the nature and location of the development TfL is satisfied that it will have a negligible impact on the capacity of the highway network, with an increase in movements associated with delivery and servicing across Cycle Superhighway 2. This site has not been included in the feasibility work for a new station entrance at the south west of Stratford station. The residents of the site will enjoy journey time benefits when the entrance is opened, and the proposed development would add to the impact on this entrance.

70 The further feasibility, delivery and funding of the new entrance is being established with LLDC and TfL, and Stratford Station Access is included on the LLDC's Regulation 123 list, and therefore TfL will actively seek a contribution via CIL for the delivery of the new entrance, and connections towards it. The Regulation 123 list also identifies replacing or enhancing Jupp Road Bridge which would assist with the connectivity in the vicinity of the development.

Car parking and vehicular access

71 TfL supports this scheme being car-light however given the proposed uses would encourage this being a car-free development. The provision of ten disabled spaces is not justified within the TA, except to say the site is highly accessible. The applicant will need to demonstrate how any additional demand for blue badge parking by residents using accessible rooms or for staff will be managed and kept under review.

72 The following measures should be secured by S106 or condition: that residents and businesses will not be eligible for local on-street parking permits; a move-in strategy; provision of one electric vehicle charging point for the blue badge bay; a delivery and servicing strategy.

Cycle parking

73 It is noted that the proposed provision of cycle parking meets London Plan (2015) standards and that the designated areas for parking are easily accessible. It is recommended that supporting facilities are provided for the non-residential land uses where long-stay cyclists require them. Supporting facilities include lockers, showers and changing rooms.

74 TfL is currently extending the Santander Cycle Hire scheme into the Queen Elizabeth Olympic Park and is investigating expanding it further into Stratford. It is expected that the proposed development on this site and others will result in an increased demand for Cycle Hire provision once the scheme is extended. TfL would request the safeguarding of a space for a potential Cycle Hire docking station within the public realm area of the site, and a contribution of £200,000 for the cost of a docking station.

75 This will support cycling trips to and from the site by residents, employees and visitors to the site. The site should be safeguarded by condition for a period of at least five years from the completion of the earliest phase of the development. Should this period elapse and the scheme not be extended, the area can revert to other public realm use.

Construction

76 There are a number of potential constraints on the redevelopment of a site situated close to Stratford High Street and Cycle Superhighway 2. The applicant should also be aware of the proposed alterations to Stratford gyratory, being developed by LB Newham, and the Construction Logistics Plan which should be secured by condition will need to set out the interface of the site build-out and gyratory scheme delivery

Travel planning

77 TfL welcomes the submission of a framework Travel Plan. The travel plan should be secured, enforced, monitored and reviewed as part of the S106 agreement.

Summary

78 The detailed transport matters identified in this report should be fully addressed before the application is referred back to the Mayor at Stage 2 to demonstrate full compliance with the London Plan.

Local planning authority's position

79 This is not known at this stage.

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 London Legacy Development Corporation must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged or direct the London Legacy Development Corporation under Article 6 of the Order to refuse the application.

81 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

82 There are no financial considerations at this stage.

Conclusion

83 Whilst the proposed use application is supported in strategic planning terms, the application does not currently comply with the London Plan in a number of important areas. The following changes might however remedy these deficiencies and could lead to the application becoming compliant with the London Plan:

- **Mix of uses** - The proposed mix of residential, student housing, education and B1c workshop uses is supported, but the possibility of a B1 office use replacing the proposed D1 education use is contrary to the London Plan as submitted and should not be taken forward.

- **The 2012 Games and their Legacy** - The application complies with the London Plan and the broad objectives set out in the Mayor's OLSPG.
- **Housing** – The introduction of C3 and student housing is supported, but evidence and detail is needed to demonstrate that the maximum reasonable level of affordable housing would be provided and the form that would take. This quantum of children's playspace should be reviewed once housing tenures, numbers and mix are settled, and a planning condition requiring a play strategy to be prepared in accordance with the Mayor's *Shaping Neighbourhoods: Play and Informal Recreation SPG* should also be required by condition if the LLDC resolves to grant permission for the scheme.
- **Urban design** - The broad approach to urban design is supported, though the matters set out in this report should be addressed.
- **Inclusive design** - The inclusive design concerns identified in this report should be fully addressed before the application is referred back to the Mayor at Stage 2 and appropriately conditioned in any approval. A planning condition requiring a detailed inclusive design strategy to be prepared in accordance with the Mayor's *Accessible London: achieving an inclusive environment SPG* should also be required by condition if the LLDC resolves to grant permission for the scheme.
- **Sustainable development** - The flood risk and energy issues identified in this report should be fully addressed before the application is referred back to the Mayor at Stage 2 to demonstrate full compliance with the London Plan.
- **Transport** - The detailed transport matters identified in this report, in particular the need for the applicant to demonstrate how any additional demand for blue badge parking by residents or for staff will be managed and kept under review should be fully addressed before the application is referred back to the Mayor at Stage 2 to demonstrate full compliance with the London Plan.

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