

**1 Knights Road, E16 2AT****in the London Borough of Newham****planning application no. 15/02808****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 the existing building on site and redevelopment for a mixed use development comprising a building of 5 and 12 storeys to provide 76 residential (Class C3) units and 99 sq.m. gross internal area (GIA) of flexible commercial (Class A1, A2, A3, A4 or B1) floorspace. An undercroft car park at ground level containing 23 car parking spaces, enclosed refuse storage, cycle storage and plant. Communal amenity space at podium level and rooftop area on the fifth floor.

**The applicant**

The applicant is **Hollybrook Limited**, the agent is **Rolfe Judd Planning Limited** and the architect is **Stockwool Architects**.

**Strategic issues**

The principle of **mixed use redevelopment** is acceptable in land use terms, and the **scale, and appearance** is in accordance with London Plan policy. Further information is required regarding housing, specifically **affordable housing, play space** and **design**, particularly **residential quality, inclusive access, energy, parking and transport** to ensure that the scheme fully accords with London Plan policy.

**Recommendation**

That Newham Council be advised that while the application is generally acceptable in strategic planning terms, on balance, the application does not comply with the London Plan, with the reasons and remedies set out in paragraph 72 of this report.

**Context**

1 On 12 November 2015 the Mayor of London received documents from Newham 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 23 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 Category 1C of the Schedule to the Order 2008:

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

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

4 The Mayor of London’s statement on this case will be made available on the GLA website [www.london.gov.uk](http://www.london.gov.uk).

## **Site description**

5 The 0.212 hectare corner site is located on Knights Road in Silvertown, approximately 20 metres from its junction with North Woolwich Road and the Docklands Light Rail (DLR) viaduct. Knights Road is a one way street with a series of industrial units still operating which exit onto North Woolwich Road via Bradfield Street, a more residential street at the rear of the site. It is understood that the industrial units adjacent to the site are owned by Newham Council and that the row of houses directly to the east of the site fronting Bradfield Street are owned by Ballymore. The area, which is in the Royal Docks Opportunity Area has a mixed character and is changing with the development of Royal Wharf to the east of the site for up to 3,000 new homes, now under construction.

6 The site is occupied by a single storey industrial/warehouse building that was formally used for manufacturing and distributing medical equipment but has now been vacant for a number of years.

7 In terms of transport, the nearest section of the Strategic Road Network (SRN) is North Woolwich Road which borders the northern part of the site, which connects to the nearest part of the Transport for London Road Network (TRLN) at the A13 at Canning Town 1.7 kilometres away. West Silvertown station is approximately 100 metres to the west of the site which is served by the DLR. Canning Town London Underground station is situated 1.6km north west of the site. The site is served by the 474 bus service with the nearest stops located within 100 metres on North Woolwich Road. The site has an ‘average’ public transport accessibility level (PTAL) of 3 (on a scale of 1 to 6, where 6 is excellent and 1 is poor).

## **Details of the proposal**

8 Demolition of the existing building on site and redevelopment for a mixed use development comprising a building of 5 and 12 storeys to provide 76 residential (Class C3) units and 99 sq.m. (GIA) of flexible commercial (Class A1, A2, A3, A4 or B1) floorspace. An undercroft car park at ground level containing 23 car parking spaces, enclosed refuse storage, cycle storage and plant. Communal amenity space at podium level and rooftop area on the fifth floor.

## **Case history**

9 On 25 June 2015, a pre-application meeting was held at City Hall where GLA officers welcomed the opportunity to engage with the applicant and support the principle of the residential-led redevelopment of this locally designated strategic site in the Royal Docks Opportunity Area. GLA officers confirmed that the applicant should further consider the proposed approach to provision of children’s play space and should ensure that if a high density proposal is proposed, that residential quality is of the highest level. Further discussions was also required

regarding affordable housing, design, inclusive design, climate change and transport to ensure that the proposal fully accords with strategic policy.

## **Strategic planning issues and relevant policies and guidance**

10 The relevant issues and corresponding policies are as follows:

- Mix of uses *London Plan*
- Housing *London Plan; Housing Supplementary Planning Guidance (SPG) and Draft Interim Housing SPG; Housing Strategy; Shaping Neighbourhoods: Providing for Children and Young People's Play and Informal Recreation SPG*
- Affordable housing *London Plan; Housing SPG and Draft Interim Housing SPG; London Housing Strategy*
- Urban design *London Plan*
- Tall buildings/views *London Plan*
- Access *London Plan; Accessible London 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 Transport Functions SPG*
- Parking *London Plan; the Mayor's Transport Strategy*

11 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is Newham Council's 2012 Core Strategy, Proposals Map and Saved policies from the Unitary Development Plan and the 2015 London Plan (Consolidated with Alterations since 2011).

12 The following are also relevant material considerations:

- The National Planning Policy Framework and Technical Guide to the National Planning Policy Framework;
- Draft Minor Alterations to the London Plan 2015; and
- Newham Council's Proposed Submission Draft Detailed Sites and Policies Development Plan Document (DPD) (2015).

## **Principle of development**

14 The site lies within the Royal Docks Opportunity Area, as identified in the London Plan. London Plan Policy 2.13 'Opportunity Areas and Intensification Areas' and Table A1.1 'Opportunity Areas' states that the Royal Docks Opportunity Area is capable of accommodating at least 11,000 homes, and 6,000 jobs up to 2031. Newham's Local Plan also identifies the site as part of Strategic Site S22 Minoco Wharf where plans to develop a new neighbourhood are under way. It is noted that the site is bound to the south by existing industrial uses. Careful management of potential conflicts will therefore be required.

### Housing

13 London Plan Policy 3.3 'Increased housing supply' provides explicit strategic support for the provision of housing within London. The London Plan sets a minimum annual housing target for Newham Council to deliver 1,994 homes in the Plan period 2015-2025. Given the strategic support for the provision of housing and the site's location within an Opportunity Area, the

principle of the redevelopment of this site for predominantly housing is acceptable. However, the applicant will need to have regard to the emerging proposals for the proposed future phases of the Royal Wharf development to ensure that both proposals are well integrated.

#### Commercial floorspace

14 The proposal include 99 sq.m. (GIA) of flexible commercial (Class A1, A2, A3, A4 or B1) floorspace. The applicant should indicate how the nature and quantum of the retail proposed, fits within the wider local area.

15 Whilst the commercial unit would be in an out of town centre location, the introduction of a small commercial component as part of the proposal would not raise any strategic issue given its size. The applicant has noted in the planning statement that no A5 uses are proposed in response to feedback from the Council that these would not be appropriate in such a location. Confirmation of this, and whether the Council is satisfied that the alternative proposed commercial floorspace will be viable and contribute to the viability of the surrounding environment, should be provided to the GLA prior to Stage II.

### **Housing**

16 The proposal comprises 76 residential units. The table below provides a breakdown of unit types based on the information received as part of the planning submission.

<b>Unit type</b>	<b>No of units</b>	<b>%</b>
<b>1 bed/2 people</b>	24	31.6
<b>2 bed/3 people</b>	5	32.9
<b>2 bed/4 people</b>	20	
<b>3 bed/5 people</b>	27	35.5
<b>Total</b>	76	100

17 The provision of 76 units would make a contribution towards Newham Council's housing targets as set out in the London Plan, and is welcomed in principle.

#### Affordable housing

18 No details regarding affordable housing have currently been presented. In accordance with London Plan Policy 3.12 'Negotiating affordable housing on individual private residential and mixed use schemes', the applicant is be required to demonstrate that the maximum reasonable amount of affordable housing is being provided. As part of this, the viability report is expected to be independently assessed on behalf of the Council, with the results to be shared in full with GLA officers. Any affordable housing provision should also be provided in accordance with the strategic tenure split target established in London Plan Policy 3.10 'Definition of affordable housing'.

19 Furthermore, as made clear to the applicant during pre-planning application stage, all affordable housing should be provided on site in line with the London Plan as well as the Mayor's Draft Interim Housing SPG.

### Housing choice

20 London Plan Policy 3.8 'Housing Choice', together with the Mayor's Draft Interim Housing SPG seeks to promote housing choice and a balanced mix of unit sizes in new developments. London Plan Policy 3.11 'Affordable housing targets' establishes that strategic priority be afforded to the provision of affordable family homes.

21 Whilst at this stage a broad mix has been indicated, which includes 35.5% family accommodation, no details on the provision of affordable family accommodation have been provided. The applicant should ensure that family accommodation is prioritised within the affordable housing, in accordance with strategic policy, and evidence of this should be provided to the GLA prior to Stage II.

### Density

22 As noted in paragraph 8 the site has a PTAL of 3 and has the characteristics of an urban area. The London matrix therefore suggests a residential density of between 200 and 450 habitable rooms per hectare (hr/ha) for this site. The applicant has indicated that the approximate density for the scheme is 1,149 hr/ha. The applicant proposed density therefore exceeds the upper density range of the London Plan. However it is acknowledged that the setting is changing in the Opportunity Area and that many of the surrounding recently consented developments (including Royal Wharf and Silvertown Quays) have the characteristics of a central setting.

23 While there is not an in-principle objection to high-density developments, the applicant should be mindful of the strategic priority, as established in London Plan Policy 3.4 'Optimising housing potential', that housing output should 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 Draft Interim Housing SPG with regard to high density development. Any development will need to demonstrate the highest standards of design, and provide high-quality residential accommodation that is well designed, and delivers an appropriate mix of units, with sufficient play and amenity space.

### Children's play space

24 London Plan Policy 3.6 'Children and young people's play and informal recreation facilities' and the Mayor's Shaping Neighbourhoods: Play and Informal Recreation SPG is relevant to this scheme, ensuring that suitable and sufficient space is provided in accordance with the expected child population of the completed development. Based on the Mayor's play space SPG, 12 children are predicted to live in the development, of which 6 would be under the age of 5. This gives rise to a total child play space requirement of 116.0 sq.m.

25 Since the pre-planning application meeting, additional play space has been provided in the proposed development, totalling 70 sq.m. on the first level now accessible to Buildings A and B, and an additional 50.03 sq.m. on the fifth floor, accessible from Building A. Whilst this additional play space is welcomed, the applicant should submit a play strategy detailing how the development will respond to the needs of all children, within provision of dedicated play space typologies for all age groups of children, as outlined in the play space SPG. This should be provided to the GLA prior to Stage II.

## **Design**

26 The scheme is generally well thought out and its layout has been designed to respond to the site's prominent location at the corner of Knights Road/North Woolwich Road and the wider context of the emerging Royal Wharf masterplan. The simple L-shaped plan provides defined building lines with active frontages along the site's street facing edges while allowing for the future extension of the urban block as development of neighbouring sites come forward. The inclusion of ground floor duplexes, each with front doors onto the street is welcomed and along with the corner commercial unit will encourage street-based activity through passive surveillance whilst also providing residents with a sense of ownership. Fencing and hedges around the ground floor private open spaces should remain transparent to further encourage visual connectivity with the street and passive surveillance. The containment of car parking and refuse stores within the interior of the block, accessed from Knights Road is also supported and provides the opportunity to link with development in the future.

27 The integration of public realm features, lawn and trees along the northern edge of the site is also supported and should be secured by condition.

28 As discussed at pre-planning application stage, the high residential density proposed means that it is crucial that the highest quality of residential accommodation is secured as part of any future permission. Whilst the plans suggest that this can be achieved through the efficient positioning of cores and inclusion of further duplex units between second and third floors, enabling efficient core to units ratios and a good proportion of dual aspect units, the predominantly single aspect units, especially those which are north facing, raise concern. The applicant should explore reconfiguring apartments and means of introducing windows in units at either end of the building and where possible (i.e. in the fourth floor units) introduce skylights to optimise daylight/sunlight penetration and means of cross ventilation. Similarly, consideration should be given to the facade design of block B's southern frontage, to avoid any overheating to south facing units.

29 The applicant should also take into consideration the noise impacts of the DLR, particularly on the north facing units adjacent to the railway. Further analysis is required to determine the extent of the impact of noise from the DLR on the development and mitigation measures required to address any noise issues. This information should be presented to the GLA prior to Stage II.

30 The south facing aspect of the podium amenity decks with access from both buildings affording access to all residents is welcomed and gives potential to create a high quality environment for residential amenity with blocks providing shelter from the DLR line.

31 The form and massing strategy is broadly supported, raising no specific strategic issues and the principle of including a twelve storey element at the prominent north west corner of the site is supported and in line with the wider objectives of the emerging draft Royal Docks Opportunity Area Planning Framework. This is subject to the scheme demonstrating the highest residential quality as detailed above. The simple and clean-lined form of the building is supported with restrained articulation achieved through the proportions and depths of window reveals. The use of high quality brickwork is also supported and gives the opportunity to add further articulation to facades through varied detailing and brick tones.

## **Inclusive design**

32 London Plan Policy 3.8 'Housing Choice' currently requires all new housing to be built to 'Lifetime Homes' standards, and expects at least 10% of units to be wheelchair accessible or

easily adaptable. However, in order to bring the London Plan into line with new national housing standards, the draft Minor Alterations to the London Plan propose to replace this with a requirement that 90% of units meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings' and the remaining 10% of units meet Building Regulation requirement M4(3) 'wheelchair user dwellings'. These requirements should be secured via condition or legal agreement and the Council and the applicant should be mindful of this when drafting any related planning conditions and/or obligations.

33 The applicant has stated that all residential units will be designed to the Lifetime Homes standard and that 10% are required to be wheelchair accessible or easily adaptable homes as currently required by London Plan policy and the Draft Interim Housing SPG. Whilst the applicant has provided plans of potential locations for wheelchair adaptable units it should be clear on the plans exactly where the wheelchair accessible homes are located and how many there are, and how they are distributed across tenures to give disabled and older people similar choices to non disabled people. Furthermore plans should illustrate wheelchair circulation across the wheelchair adaptable units and details of the internal stairlift installation required in the duplexes to ensure they are wheelchair adaptable. This information should be provided to the GLA prior to Stage II.

## **Sustainability**

### Energy efficiency

34 The applicant has broadly followed the energy hierarchy. Sufficient information has been provided to understand the proposals as a whole.

35 Further revisions and information are required before the proposals can be considered acceptable and the carbon dioxide savings verified.

36 Appendix 1 of the energy statement suggests that the emission factors for Part L 2010 have been used to assess the carbon emissions for the site. The calculations should be based on Part L 2013 and the emission factors within it. The calculations should be updated accordingly.

37 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 and mechanical ventilation with heat recovery.

38 The applicant has stated that the development meets criterion 3 of Part L 2013 for risk of high temperatures in summer. This is not considered sufficient to demonstrate compliance with London Plan Policy 5.9 'Overheating and cooling'. The applicant should demonstrate that the design has been developed in line with the cooling hierarchy and that overheating risk has been addressed. If criterion 3 shows more than a "slight" risk of high temperatures, additional passive measures should be incorporated to ensure the development is not at risk of overheating. Dynamic overheating modelling in line with CIBSE TM52 and TM49 is strongly recommended.

39 The development is estimated to achieve a reduction of 0.2 tonnes per annum (0.2%) in regulated CO<sub>2</sub> emissions compared to a 2013 Building Regulations compliant development. Sample DER and TER sheets including efficiency measures alone (i.e. excluding CHP and PV) should be provided to support the savings claimed under this tier of the energy hierarchy.

40 The applicant has identified that the proposed Royal Docks district heating network is within the vicinity of the development. Connection to the network should be prioritised and evidence of correspondence with the network developer should be provided.

41 The applicant has provided a commitment to ensuring that the development is designed to allow future connection to the district heating network.

42 The applicant is proposing to install a communal heating system. However, the applicant should confirm that all apartments and non-domestic building uses will be connected to the site heat network.

43 The site heat network should be supplied from a single energy centre. Further information on the floor area and location of the energy centre should be provided.

44 The applicant is proposing to install a 15 kW<sub>e</sub> 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. A reduction in regulated CO<sub>2</sub> emissions of 29.7 tonnes per annum (30%) will be achieved through this second part of the energy hierarchy.

45 The development is very small which suggests that CHP is unlikely to be a technically and financially viable solution (see GLA Guidance on preparing energy assessments (April 2015) for further guidance). The use of CHP is not supported in this instance and it is recommended that the carbon savings to meet the target are sought by further efficiency savings and further renewables.

46 If the applicant intends on installing CHP, further information needs to be provided on the technical and financial viability of this option. The information should include: expected running hours, monthly load profiles and proposed contribution from CHP, proposed management arrangements and use of the electricity. It should also be demonstrated that the carbon savings are calculated using gross efficiency figures for the engine rather than net efficiency.

47 The applicant has investigated the feasibility of a range of renewable energy technologies and is proposing to install 9kWp of solar PV on the roof of the building. A roof plan showing the proposed installation has been provided.

48 A reduction in regulated CO<sub>2</sub> emissions of 5.4 tonnes per annum (5.4%) will be achieved through this third element of the energy hierarchy.

49 Additional savings should be sought from renewables instead of proposing CHP due to the intermittent nature of the site's heat loads.

50 Based on the energy assessment submitted at stage I, a reduction of 35.1 tonnes of CO<sub>2</sub> per year in regulated emissions compared to a 2013 Building Regulations compliant development is claimed, equivalent to an overall saving of 35.8%.

51 The comments above should be addressed before the carbon savings and compliance with London Plan energy policy can be verified.

#### Flood risk

52 The proposed development is adjacent to the DLR and 3 metres away from the viaduct running parallel to North Woolwich Road. Although not opposing this development, based on



the proximity of the site to the operational railway, TfL have some concerns regarding the demolition, design, construction and temporary works proposed. From an infrastructure protection perspective and would seek we would seek specific conditions on the application. These conditions have been forwarded to the Council.

53 A Flood Risk Assessment (FRA) has been undertaken by Mayer Brown. This confirms that the site is within Flood Zone 3a and benefits from a high standard of flood protection from the existing defences. The FRA acknowledges that the site would be affected in the event of a breach to the tidal defences. The FRA goes on to state that the ground flood level will be raised to above that of the likely depth of flood water during a breach event. All ground floor units will have access to upper levels and a Flood Emergency Plan will also be prepared.

54 The FRA acknowledges that the site is at risk of surface water flooding. However, it does not confirm whether the proposed mitigation measures for tidal breaches would also act as mitigation in the event of a surface water event. It should be noted that the SUDS proposals will not of themselves act as mitigation against a surface water event as the floodwater will come predominantly from the surrounding local catchment area.

55 In order to comply with London Plan Policy 5:12 'Flood risk management', the applicant should confirm that there are mitigation measures proposed to reduce the impact of a surface water flood event.

#### Sustainable drainage

56 The FRA acknowledges that the site and wider surrounding area is at risk of surface water flooding, therefore the implementation of London Plan Policy 5:13 'Sustainable drainage' will be an important consideration for this site.

57 The FRA states that surface water will be attenuated by the use of an attenuation tank of approximately 60m<sup>3</sup>, providing at least a 50% reduction in discharge rate for the 1 in 100 year storm.

58 Given the nature and location of the proposals, this is an acceptable implementation of London Plan Policy 5:13.

### **Transport for London's comments**

#### DLR

59 The proposed development is adjacent to the DLR and 3 metres away from the viaduct running parallel to North Woolwich Road. Although not opposing this development, based on the proximity of the site to the operational railway, TfL have some concerns regarding the demolition, design, construction and temporary works proposed. From an infrastructure protection perspective and would seek we would seek specific conditions on the application. These conditions have been forwarded to the Council.

#### Car and Cycle Parking

60 The scheme provides a total of 23 spaces (at a ratio of 0.3) of which 7 will be allocated for disabled parking and 20% will be for electric vehicles. TfL requires that Blue Badge parking and electric vehicle charging points (active and passive) are provided in accordance with London Plan standards and also a car parking management plan.

61 There will be 132 secure cycle spaces provided for residents, and 8 spaces for the commercial element of the site. Cycle parking to comply with London Plan (2015) standards should be secured by condition together with cyclist facilities (showers, lockers and changing areas) for the non-residential uses.

#### Trip generation

62 Trip generation has been carried out using TRICS sites and demonstrates that the number of vehicular trips will remain at the same level as that which would occur if the existing use were operational, resulting in no additional impacts on peak hour traffic flows on the SRN or TLRN. TfL is also satisfied that there will be no impact on public transport services.

#### Urban realm

63 TfL would welcome discussions with the applicant and the Council to agree how any improvements can be secured between the site boundary and the kerb line at North Woolwich Road. The vehicle crossover and on-street loading bay should be raised and treated with materials complementary to the footway to signal pedestrian priority.

#### Servicing and Construction

64 A Construction and Logistics Plan has been prepared, however given the site location and proximity to the DLR viaduct, additional mitigations (as outlined in section above) need to be enforced to ensure that operation of services are unaffected by construction works. The final CLP should be secured via a condition and submitted to the Council for approval prior to the commencement of construction upon the site.

65 It is understood that the majority of deliveries would take place within the site. A full Delivery and Servicing Plan should be secured by condition.

66 TfL welcomes the submission of a Travel Plan Statement and this should be secured through condition/obligation.

#### Mayoral CIL

67 In accordance with London Plan Policy 8.3 'Community infrastructure levy, the Mayoral Community Infrastructure Levy (CIL) came into effect on 1st April 2012. All new developments that create 100 sq.m. or more of additional floor space are liable to pay the Mayoral CIL. The levy is charged at £35 per square metre of additional floor space in the Borough.

68 In order to comply with the transport policies of the London Plan the following is sought:

- Conditions in relation to DLR (detailed in this letter sent to the Council).
- Improvements between the site and North Woolwich Road to be discussed with the applicant and the Council.
- Supporting services for cyclists using the commercial premises should be provided. Cycle facilities should be secured by condition.
- The vehicle crossover and on-street loading bay should be raised and treated with materials complementary to the footway to signal pedestrian priority.
- A Travel Plan, Construction and Logistics Plan and Delivery and Servicing Plan should be secured by condition or s106 agreement.

## Local planning authority's position

69 Newham Council's position regarding this scheme is unknown at this stage.

## Legal considerations

70 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

71 There are no financial considerations at this stage.

## Conclusion

72 London Plan policies on land use, housing, design, access, climate change and transport are relevant to this application. Whilst the application is broadly acceptable in strategic planning terms, on balance, the application does not comply with the London Plan and changes and further information is required, as detailed below is required to comply fully:

- **Land use principles:** The principle of a mixed use development with residential uses alongside and above a commercial space is supported.
- **Housing:** No details regarding affordable housing have currently been presented. The applicant is required to demonstrate that the maximum reasonable amount of affordable housing is being provided. As part of this, the viability report is expected to be independently assessed on behalf of the Council, with the results to be shared in full with GLA officers.
- **Design:** The design of the scheme has been generally well thought out. The residential quality of the proposal is required to be exemplary in all regards to justify the higher density of the proposal, and as such further consideration should be given to improving access to daylight and sunlight and cross ventilation by altering single aspect units to become dual aspect, particularly given the proximity of the DLR.
- **Inclusive design:** The inclusive design provisions are welcomed, however further plans outlining exactly where the wheelchair accessible homes are located and how many there are, and how they are distributed across tenures, wheelchair circulation and internal unit stairlift installation are to be provided to the GLA prior to Stage II. 90% of units should meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings' and the remaining 10% of units meet Building Regulation requirement M4(3) 'wheelchair user dwellings'. These requirements should be secured via condition or legal agreement and the Council and the applicant should be mindful of this when drafting any related planning conditions and/or obligations.

- **Climate change:** Though the carbon dioxide savings (35%) meet the target within Policy 5.2 of the London Plan, further information is required before compliance with London Plan energy policy can be verified.

**Transport:** The application is generally acceptable in principle and in accordance with the transport policies of the London Plan subject to appropriate conditions and s106 obligations which should be secured in relation to cycle parking and facilities, parking permits, deliveries and servicing, car park management, construction logistics, public transport and a travel plan. Mayoral and local CIL payments will also need to be secured.

73 On balance, the application does not yet comply with the London Plan, for the reasons set out above; however the possible remedies set out above could address these deficiencies.

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

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