

**Dean Bradley House, Horseferry Road**

in the City of Westminster

planning application no. 15/07690/FULL

**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 Dean Bradley House and redevelopment to provide double basement, ground, and nine floors for car and cycle parking at basement level, 263 sq.m. of retail floorspace (Class A1/A3) at ground floor level, 975 sq.m. of office floorspace at first floor level and 45 residential units at second to ninth floor levels (14 x 1 bed units; 18 x 2 bed units; 12 x 3 bed units; and 1 x 4 bed unit) with balconies. Installation of plant at ninth floor level. Landscaped communal areas, servicing area and highways alterations in Romney Street.

**The applicant**

The applicant is **Mayfair Charities Ltd**, the architect is **Squire & Partners**, and the agent is **Jones Lang LaSalle**.

**Strategic issues**

In strategic planning terms, the principle of the proposed **mixed-use redevelopment** including **residential** floorspace within the **CAZ** is generally supported in strategic planning terms, subject to the submission of further information regarding strategic and local office demand as well as an analysis of existing and proposed employment floorspace and jobs.

At present there are a number of outstanding issues regarding **housing, affordable housing, urban design, inclusive design, sustainable development** and **transport** that need to be addressed before being referred back to the Mayor.

**Recommendation**

That Westminster City Council be advised that while the application is generally acceptable in strategic planning terms the application does not comply with the London Plan, for the reasons set out in paragraph 71 of this report; but that the possible remedies set out in paragraph of this report could address these deficiencies.

## Context

1 On 28 September 2015 the Mayor of London received documents from Westminster City 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 6 November 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(c) of the Schedule to the Order 2008: *"development which comprises or includes the erection of a building more than 30 metres high and is outside the City of London."*

3 Once Westminster City 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 site in the City of Westminster comprises a 1930's office building at the junction between Horseferry Road and Dean Bradley Street. To the rear of the site is a three storey public house and four storey townhouses facing Romney Street. The building adjoins a Grade II listed building (62 – 64 Horseferry Road) at its western boundary.

6 Dean Bradley House is set within the Smith Square Conservation Area and is identified as an unlisted building of merit. The building is constructed in a T-shape with a two storey high mansard roof and a symmetrical facade facing Horseferry Road. The brown brick façade incorporates shallow recessed ribbon windows. The building is eight storeys high and comprises ground floor retail uses and office use on the upper floors. The building has a vehicular entrance from Dean Bradley Street and pedestrian access into the office and retail floorspace is obtained from Horseferry Road.

7 With regards to accessibility, Westminster, St James's Park, Victoria and Pimlico underground stations are all a ten to fifteen walk away from the site, as is Victoria Railway Station. The site is also served by a number of bus routes. As a result the site records an excellent public transport accessibility rating of 6a, on a scale of one to six, where six is excellent.

## Details of the proposal

8 Demolition of Dean Bradley House and redevelopment to provide 45 residential units at second to ninth floors, 263 sq.m. of A1/A3 retail at ground floor level and 975 sq.m. of B1 office floor space at first floor level. Associated parking at basement level and landscaped communal areas.

## Case history

9 The applicant engaged in pre-application discussions with GLA officers regarding the proposals for site in August 2015. The discussions concluded that the principle of the office-led mixed-use redevelopment of this site was generally supported, subject to the submission of further information regarding the existing and proposed floorspace and a heritage assessment justifying the loss of the existing building as part of any planning application submission. There

were specific concerns raised relating to urban design and the townscape benefits of reinstating the historic building line along Romney Street and the applicant was advised to address them through further revisions to the scheme. Further information and clarification was also sought regarding housing, affordable housing, inclusive design, sustainable development and transport, which should also be addressed.

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

10 The relevant issues and corresponding policies are as follows:

- |                           |  |
|---------------------------|--|
| • CAZ and mix of uses     | <i>London Plan</i>   |
| • Historic Environment    | <i>London Plan; World Heritage Sites SPG;</i>  |
| • Housing                 | <i>London Plan; Housing SPG; Housing Strategy; Shaping Neighbourhoods: Play and Informal Recreation SPG; Shaping Neighbourhoods: Character and Context, draft SPG</i>                  |
| • Affordable housing      | <i>London Plan; Housing SPG; Housing Strategy</i>  |
| • Urban design            | <i>London Plan; Shaping Neighbourhoods: Character and Context, draft SPG; Housing SPG; London Housing Design Guide; Shaping Neighbourhoods: Play and Informal Recreation SPG</i>       |
| • Inclusive design        | <i>London Plan; Accessible London: achieving an inclusive environment SPG</i>  |
| • Transport               | <i>London Plan; the Mayor's Transport Strategy</i>   |
| • Sustainable development | <i>London Plan; Sustainable Design and Construction SPG; Mayor's Climate Change Adaptation Strategy; Mayor's Climate Change Mitigation and Energy Strategy; Mayor's Water Strategy</i> |

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: the Westminster City Plan: Strategic Policies (2013); the saved policies in the Westminster Unitary Development Plan (2007, saved 2010); and the London Plan (Consolidated with Alterations since 2011).

12 The following are also relevant material considerations:

- National Planning Policy Framework and Planning Practice Guidance to the National Planning Policy Framework.
- London Plan Housing and Parking Standards (Minor Alterations to the London Plan Consultation Draft), April 2015.
- The London Plan draft interim Housing SPG (out for consultation).
- Revision to Westminster City Plan – Mixed Use and Office to Residential Conversion, booklet no.18 (Dec 2014).
- Westminster City Council approach to office to residential conversion statement (July 2015).
- Westminster Council's Interim Guidance Note: Affordable Housing Policy (2013).

## **Principle of development**

### Loss of office space

13 The site is located within the Core Central Activities Zone as identified in Westminster's City Plan. The proposals comprise the demolition of the existing mixed-use commercial building and the redevelopment of the site to provide a residential-led, mixed-use development comprising 45 residential units, two ground floor retail units and 975 sq.m. of office space at first floor. The existing building currently provides 6,006 sq.m. of office floorspace in addition to 1,040 sq.m. of A1/A2/A3/A5 retail space. Therefore, one of the main strategic issues relates to the loss of office space in the Central Activities Zone (CAZ). The overall net lot of office floorspace equates to approximately 5,031 sq.m.

14 Whilst the London Plan does not specifically protect office buildings, it promotes the provision of office capacity in London and in the CAZ. London Plan Policy 4.3Bd, in particular, states that, where justified by local and strategic office demand assessments and in areas identified by local policy as having a particular need for local office provision, residential proposals within the CAZ which would otherwise result in the loss of office space should make a proportionate contribution to the provision of new office space within, or nearby, the development.

15 It is noted that Westminster Council has stated that from 1 September 2015 applications for housing in the Core CAZ would no longer be acceptable in principle where it results in a loss of office floorspace (Councillor Robert Davis' Statement on Westminster City Council approach to office to residential conversion (July 2015)). It is also noted that Westminster City Council is currently in the process of reviewing its City Plan and has issued a publication draft Mixed Use Revision (Regulation 19). However, at the time of this application which was submitted and validated by the City Council prior to 1 September 2015, the policies have not yet been adopted and therefore have little weight as a material consideration. Furthermore, it is understood from pre-application discussions with Westminster Council that in this case and as a result of the timing of the application, the loss of office space is acceptable in principle in this location.

16 From a strategic policy perspective and subject to the views of Westminster City Council, the overall net loss of office space is acceptable in principle if it can be demonstrated that this area does not have a particular need to retain existing levels of office floorspace. As requested at the pre-application stage, evidence setting out an assessment of strategic and local office demand as well as an analysis of existing and proposed employment floorspace and jobs should be provided to support the proposed mix of uses. Notwithstanding the above, it is recognised that the proposals include one floor of office floorspace in addition to two new retail units, and therefore an element of better quality employment space will be re-provided on the site, which is welcomed.

### Retail use

17 The proposal includes the provision of approximately 263 sq.m. of A1/A3 retail floorspace at ground floor, either side of the proposed residential entrance lobby.

18 London Plan Policy 2.11 supports the expansion of retail capacity within the CAZ to meet strategic and local need when it is focused on the CAZ frontages. The proposals would result in a reduction in the amount of retail capacity in this location; however, the site is not part of a CAZ frontage and this is therefore accepted. The provision of small scale retail units will contribute towards providing an active ground floor frontage and is strongly supported.

## Residential

19 The scheme is proposing 45 residential units. Strategic policy acknowledges the diverse range of uses that exist within the CAZ, recognises that the CAZ is a place where people live, and that having a range of homes within the CAZ helps to support its strategic function. The proposal will also contribute towards the delivery of London's housing requirements and the Council's minimum target of 1,068 homes per year between 2015 and 2025. The provision of residential floorspace is therefore in line with London Plan Policy 3.3 and generally supported.

## **Housing**

20 The development proposals will deliver 45 residential units at the following mix:

	Market units
One bed	14
Two bed	18
Three bed	12
Four bed	1
<b>Total</b>	<b>45</b>

## Affordable housing

21 London Plan Policies 3.11 and 3.12 require the maximum reasonable amount of affordable housing to be delivered in all residential developments above ten units, taking into account; the need to encourage rather than restrain development; the housing needs in particular locations; mixed and balanced communities, and the specific circumstances of individual sites. London Plan Policy 3.11 also sets out that affordable housing should be provided at a ratio of 60:40 social/affordable rent to intermediate housing.

22 With regards to local planning policy, as the proposed residential floorspace exceeds 1,000 sq.m. and will deliver more than ten units, affordable housing will be required in line with Westminster's City Plan Policy S16 and the City Council's Interim Note on the implementation of affordable housing, which requires that 25% of the residential floorspace be affordable.

23 At the pre-application stage, the applicant set out that the scheme would not deliver any affordable housing on site and opportunities to provide affordable housing off-site had also been explored but that no sites were available in the required delivery timeframe. In light of this, the proposals seek to provide a cash in lieu contribution of £1,660,000 towards affordable housing. It is acknowledged that this is significantly less than a policy compliant contribution of £8,827,043 calculated in accordance with the methodology set out in Westminster City Council's 2013 Interim Guidance Note: Affordable Housing Policy.

24 As made clear in London Plan Policy 3.12, affordable housing is expected on-site. It was acknowledged at the pre-application stage, that given the location and scale of housing proposed on-site, it may not be practical or viable to deliver on-site affordable housing, but that the applicant should ensure that the limitations to on-site delivery were clearly set out as part of the planning application to support its approach. Should on-site affordable housing delivery not be proposed, in the first instance, and as set out in the London Plan and Mayor's Housing SPG, the applicant should then fully explore off-site delivery. Again, any limitations to this approach should be set out in full as part of any future planning application. Should it be demonstrated by the applicant that neither on-site nor off-site affordable housing is practical and feasible, then a payment in lieu could be considered.

25 The applicant has carried out an assessment exploring onsite and offsite options which concludes that onsite provision of affordable housing would result in significant design constraints due to the need for separate entrances and building cores and there would be an impact on the quantum of proposed retail and office floorspace, which are considered positive aspects of the scheme. In addition, the report states that the high level of service charge associated with providing a dual tenure residential lobby would be inappropriate for transfer and management by a registered provider and that the financial impact of provide onsite affordable housing would make the scheme financially unfavourable such that a reasonable developer would not take the scheme forward.

26 The applicant states it has also explored opportunities for offsite provision, however, it has been unable to identify a suitable site within the vicinity which could be delivered in line with the development programme and Westminster City Council's policy tests. Furthermore, the applicant considers that the high costs associated with purchasing a site, securing planning permission and delivering the number of units required by policy would be prohibitively high and not financially viable.

27 The applicant has submitted a financial viability assessment to demonstrate that the provision of onsite and offsite affordable housing is not a viable option and that the proposed contribution is the maximum reasonable amount that can be provided. The justification set out above by the applicant could be considered acceptable given the scale of housing to be delivered subject to the financial constraints being verified by the locally-led independent assessment of the financial viability assessment to be carried out by the Council. The results should be shared in full with GLA officers prior to determination. Given the high residential values achieved in this area, GLA officers consider an offsite payment in the region of £8 million should be achievable.

#### Residential choice

28 London Plan Policy 3.8, together with the Mayor's Housing SPG seeks to promote housing choice and seek a balanced mix of unit sizes in new developments, with particular focus on affordable family homes. The current proposals would not provide any affordable family accommodation on site and therefore further discussion is required subject to the outcome of the above viability assessment. Notwithstanding this, the overall acceptability of the proposed housing mix should be established in consultation with the Council's housing team.

#### Residential quality

29 The proposed residential quality appears high, with a maximum of four units per residential core ensuring a good sense of ownership over the communal spaces. The majority of units are dual aspect and the addition of balconies to the southern and eastern elevations will provide those units with private amenity space. As part of any future application, the applicant should provide an

assessment of the residential units against the good practice standards set out in the Mayor's Housing SPG.

30 All the units are generous in size and will exceed the Mayor's minimum space standards, which is welcomed. However, proposals which include over-sized units can raise strategic concern, particularly given their potential adverse impact on the requirement to optimise housing output, and specifically the need to maximise affordable housing delivery. Therefore, any affordable housing delivery needs to take into account the comparatively large size of the proposed private residential units.

#### Children's play space

31 In accordance with the Shaping Neighbourhoods: Play and Informal Recreation SPG 2012, as the projected child yield for the development is expected to be less than ten, on-site play provision is not required but an equivalent financial contribution to an existing or new off-site provision should be made. It is understood that the proposed courtyard space will be designed in a child-friendly manner to provide on-site opportunities for informal play.

#### Residential density

32 Given the characteristics of the site, the public transport accessibility level of 6a, and its central location, the London Plan density matrix (Table 3.2 in support of London Plan Policy 3.4) would suggest an indicative residential density of between 650 to 1,100 habitable rooms per hectare for this development. The applicant has indicated that the density of the proposed development equates to 966 habitable rooms per hectare which falls within the suggested ranges in the London Plan.

### **Urban design & heritage**

33 As set out above, the site is within the Smith Square Conservation Area and the existing building is identified in the Smith Square Conservation Audit as an unlisted building of merit. In addition, 62-64 Horseferry Road adjoins Dean Bradley House and is Grade II Listed.

34 The proposals seek to demolish the existing 1930's office building and comprehensively redevelop the site. The applicant has investigated the opportunity to retain and convert the existing building, however, due to a number of physical constraints with the building fabric it was concluded that it would not be suitable for conversion to modern requirements. Primarily, the regular deep downstand beams which would restrict the floor to ceiling height of any future use to approximately 2.1 metres when a raised floor is installed. This beam structure would also restrict the distribution of services. In light of this, it is accepted that the building would not be suitable for a residential conversion that would provide units that meet the Mayor's residential design standards.

35 When considering development that affects a listed building or its setting, the Mayor must have special regard to the desirability of preserving the building or its setting, or when considering any development that affects a conservation area, the Mayor must pay special attention to the desirability of enhancing or preserving the character or appearance of that area. Furthermore, London Plan Policy 7.8 regarding heritage assets and archaeology requires that development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.

36 The applicant has submitted a detailed heritage and townscape appraisal which concludes that the existing building makes a neutral contribution to the character of the Smith

Square Conservation Area and that any architectural interest is confined to its articulation at ground level through the loggia of shops. However, the report goes further to state that the building's monolithic form and extensive frontage struggles to sit comfortably within its context, ignoring the finer grain of the area. This form is emphasised by the strong horizontal fenestration and the large mansard roof which when combined with the replacement of the original Crittall windows with a uPVC substitute, further detract from the buildings contribution to the character of the conservation area.

37 The proposed building would break down the existing elevation by dividing it into three vertical elements, mitigating the scale of the block and responds more appropriately to the character of the surrounding conservation by providing more architectural variety. Furthermore, as set out within this report, the proposed height, scale and massing of the building does not raise any strategic concerns and is not considered to negatively impact on the adjacent listed building. In addition, the proposed use of materials is consistent with the character of nearby buildings within the conservation area and is sympathetic to the architectural detail of the 62-64 Horseferry Road.

38 Overall, while acknowledging that the proposals involve the replacement of a building of merit, the proposed scheme is considered to make a positive improvement and enhanced contribution to the conservation area when compared to the existing building. It is also understood from pre-application discussions, that Westminster City Council have not raised objections to the principle of demolishing the existing building from a heritage perspective.

39 As expressed at the pre-application stage, the design of the proposal is generally well-considered and the overall scale, bulk, massing and general appearance as presented does not raise any strategic urban design issues. The architectural treatment is sympathetic to the character of the existing townscape through the use of red brick and stone detailing and is not considered to have a negative impact on the adjacent Grade II Listed building. As set out above, the contribution of the proposed building to the conservation area will exceed that of the existing Dean Bradley House.

40 The applicant has provided a detailed heritage and townscape appraisal that includes accurate visual representations of the proposed building in several views from around the site and from the adjacent conservation area and officers consider that the proposed bulk and massing sits comfortably in the existing and emerging built context. The proposed parapet line responds positively to the existing Courthouse building to the west and the consented massing for the Ergon House development to the east.

41 The applicant has also provided views from the strategically protected views of the Palace of Westminster from LVMF View 15A.1 Waterloo Bridge, LVMF View 17 Golden Jubilee/Hungerford Footbridges, LVMF View 18A.1 & 2 from Waterloo Bridge and LVMF View 22A.3 from Albert Embankment which demonstrate that the development will remain completely concealed by existing development when viewed from these points and will therefore not affect the viewer's ability to appreciate the outstanding universal value of the World Heritage Site.

42 However, as discussed in length at the pre-application stage, officers are of the opinion that the redevelopment of this site represents a significant opportunity to repair the street frontage along Romney Street and that the proposed building layout should be revisited to bring the building line forward at this location. It is currently proposed that a rear entrance and courtyard space is provided that fronts onto the street. As a result, when viewed from Dean Bradley Street the large area of flank wall of the existing listed terraced houses dominates the view. Furthermore, the proposed stepping back of the building line may also encourage the



congregation of customers from the pub at this location and provide potential opportunities for anti-social behaviour to occur.

43 Therefore, as expressed at the meeting, the applicant is encouraged to revisit this aspect of the scheme and explore alternative layouts that repair the historic building line along Romney Street and improve the setting of adjacent listed buildings through the provision of some form of residential units that are similar in scale and typology to the existing terraced housing. This would help make a positive contribution to the streetscape by better integrating the new building into the existing built context while also optimising housing delivery. It is understood from recent discussions with the applicant since the submission, that this option is currently being explored which is strongly welcomed. GLA officer's welcome further information on these revisions when they are available.

44 Notwithstanding the above, the introduction of two small retail units that front onto Horseferry Road and also wrap the eastern corner onto Dean Bradley Street will help maximise active frontages onto these routes and are strongly supported.

## **Inclusive design**

45 The applicant has provided a statement of intent within the supporting design and access statement setting out how the proposed scheme will provide a safe and inclusive environment for all users, which is welcomed. The statement sets out that all entrances will be clearly identifiable with flush thresholds and that all circulation routes within the building will meet the standards set out with Approved Document Part M. This is welcomed, however, a detailed accessibility statement should be secured by planning condition to ensure that inclusive design principles are built through to the detailed design of the proposed building.

### Residential units

46 The applicant has confirmed that 10% of the residential units will be wheelchair accessible and that all other units will be designed to meet Lifetime Homes standards. This is welcomed; however, compliance with these standards should be demonstrated on plan, using a sample of flat layouts. In light of the new national technical standards, appropriate planning conditions should be attached to any future planning permission to secure access standards in line with the relevant Building Regulations Approved Document. As part of this, the applicant should demonstrate on plans which units will be wheelchair user dwellings prior to commencement and these should be distributed across tenure types and sizes to give disabled and older people similar choices to non-disabled people (unless the council through their Accessible Housing Register work can advise on the need in this part of the borough for a particular size of wheelchair accessible home).

### Car parking

47 The proposals will provide five disabled parking spaces and therefore each wheelchair unit will have a dedicated wheelchair accessible parking space. This meets the requirements of the Wheelchair Housing Design Guide, and is welcomed. The applicant should indicate the location of each blue badge bay on the basement floor plan.

48 It is also recommended that the applicant should consider providing storage space and charging points for mobility scooters, in accordance with standard 2.3.7 of the Mayor's Housing SPG. In addition, it is important that disabled and older people have easy access to cycle parking and therefore further consideration should also be given to ensure the cycle parking area can be used to store adapted cycle or trikes to encourage their use by disabled and older people.

## **Sustainable development**

49 The applicant should provide the carbon emission figure in tonnes per annum for each stage of the energy hierarchy and refer to tables one and two in the latest GLA assessment guidance for the required format. The applicant should commit to meeting Part L 2013 through efficiency measures alone. Full SAP TER/DER calculation sheets and BRUKL sheets should be provided for the 'be lean' stage to support the savings claimed.

### Energy efficiency

50 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.

51 The applicant is proposing comfort cooling in the dwellings and office space. The demand for cooling will be minimised through solar control glazing and internal blinds. The applicant has provided Part L assessments which show the sample dwellings are at a 'slight' risk of overheating and that the non-domestic spaces will meet the solar gain requirements. It is recommended that dynamic overheating modelling in line with CIBSE Guidance TM52 and TM49 is undertaken in order to fully demonstrate that the dwellings are not at risk overheating (without reliance on comfort cooling). Should it be demonstrated that the passive or other measures proposed have successfully addressed the risk of overheating without the need for mechanical cooling, the applicant should reconsider the inclusion of comfort cooling.

### District heating and combined heat and power (CHP)

52 The applicant has carried out an investigation and there are no existing or planned district heating networks within the vicinity of the proposed development. The applicant has, however, provided a commitment to ensuring that the development is designed to allow future connection to a district heating network should one become available. This is welcomed.

53 The applicant is proposing to install a site heat network and has stated that the retail element is being developed to shell and core and will provide the first occupants capped connections to the heat network should they require it. The applicant should commit to providing capped connections as part of the initial service strategy in order to reduce the need for future retro fit measures. A drawing showing the route of the heat network linking all uses on the site should be provided.

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

55 A 15 kW<sub>e</sub> gas fired CHP unit is proposed as the lead heat source for the network and is sized to provide the domestic hot water load, as well as a proportion of the space heating. The applicant should provide further information on the management arrangements proposed for the system, including anticipated costs, given that the management and operation of small CHP systems can significantly impact their long term financial viability. In addition, the applicant should provide the carbon emission figure in tonnes per annum for the 'be clean' stage of the energy hierarchy.

## Renewable technology

56 The applicant has investigated the feasibility of a range of renewable energy technologies and is proposing to install 25 sq.m. of roof mounted photovoltaic panels. The carbon emission figure in tonnes per annum for 'be green' stage of the energy hierarchy should be provided.

## Summary

57 Based on the submitted energy assessment, a saving of 35% in regulated emissions compared to a 2013 Building Regulations compliant development is expected. The carbon dioxide savings meet the target set within London Plan Policy 5.2. However, the comments above should be addressed before this compliance with strategic energy policy can be verified.

## **Transport**

### Car Parking

58 The development proposes 43 car parking spaces for the 45 residential units, which equates to a parking ratio of 0.96. This level of car parking is considered wholly excessive for this highly accessible location and does not reflect the requirements of London Plan Policy 6.13, which requires development to aim for "significantly less than 1 space per unit". It is significantly higher than the existing car ownership in the ward (0.32) and the adjacent one (0.36). Furthermore, it well exceeds the 0.61 and 0.79 ratios provided within recent neighbouring developments.

59 Nine spaces will have active electric vehicle charging points (EVCP) whilst a further nine spaces will have passive provision which is in accordance with London Plan policy. However, in the event parking is reduced then EVCP's should be provided at a 20% active and 20% passive of the number of units.

60 Five of the residential car parking spaces are to be allocated for blue badge users which accords with London Plan policy. Again, in the event that parking is reduced then Blue Badge spaces should remain at 10% of the number of units. EVCP and Blue Badge parking should be secured by condition.

61 Residents should be excluded from taking up parking permits within the local Controlled Parking Zone (CPZ) through an appropriate section 106 obligation in order to control the pressure for on street parking.

### Cycle Parking

62 The current cycle parking provision of 138 spaces, including long and short stay provision for all uses, currently falls short of the minimum standards required by London Plan Policy 6.9. This level of provision and the details thereof should be secured by condition.

### Pedestrian Environment

63 A layby is proposed on Romney Street for residential drop-off/pick up, refuse collection and will be used by all delivery and service vehicles accessing the site. Notwithstanding the comments made in the above urban design section regarding this frontage, Transport for London (TfL) would suggest that suitable on street provision is made instead to provide a better walking environment.

## Servicing and Construction

64 A delivery and servicing plan that fully accords with TfL guidance should be secured by condition and submitted for approval prior to first occupation. A construction management plan has been submitted which is welcomed by TfL. The plan should incorporate a detailed construction logistics plan which should be secured by condition and should include safety measures for cyclists.

## Travel Plan

65 A residential travel plan has not been provided for the development. However, a workplace travel plan statement has been included within the submission. A residential travel plan should therefore be submitted and the subsequent detailed travel plans, should be secured, funded and monitored through a section 106 agreement, with a range of the identified mitigation measures developed into specific agreed outcomes.

## **Community Infrastructure Levy**

66 In accordance with London Plan Policy 8.3, the Mayoral Community Infrastructure Levy (CIL) came into effect on 1st April 2012. All new developments that create 100 m<sup>2</sup> or more of additional floor space are liable to pay the Mayoral CIL. The levy is charged at £50 per square metre of additional floor space in the City of Westminster.

67 The site is also in the area where s106 contributions for Crossrail will be sought (where appropriate) in accordance with London Plan Policy 6.5 and the associated Supplementary Planning Guidance (SPG) 'Use of planning obligations in the funding of Crossrail' (April 2013).

## **Local planning authority's position**

68 The local planning authority's position is not known at the time of writing this report.

## **Legal considerations**

69 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**

70 There are no financial considerations at this stage.

## Conclusion

71 London Plan policies on the Central Activity Zone, housing, affordable housing, urban design, inclusive access, transport and climate change mitigation are relevant to this application. The application complies with some of these policies but not with others, for the following reasons. The possible remedies set out in paragraph below and within the above report could address these deficiencies:

- **Principle of development:** The principle of the residential-led, mixed-use development of the site including the re-provision of some office space and retail is generally supported in strategic planning terms, subject to the submission of further information regarding strategic and local office demand as well as an analysis of existing and proposed employment floorspace and jobs. GLA officers raise no strategic objections to the loss of the existing building.
- **Affordable housing:** The applicant has explored the opportunity to provide on-site and off-site affordable housing, has deemed these approaches not financially viable and is proposing a financial contribution in-lieu of any provision. Further information and discussion pending the outcome of the locally-led independent assessment of the financial viability assessment is required to determine whether the application complies with London Plan affordable housing policy 3.12.
- **Housing:** The proposed residential quality appears high and is welcomed. Any affordable housing delivery needs to take into account the comparatively large size of the private units.
- **Urban design:** The design of the proposal is generally well-considered and the overall scale, bulk, massing and general appearance as presented does not raise any strategic urban design issues and responds positively to the conservation area and adjacent listed building. Notwithstanding this, the applicant is strongly encouraged to explore alternative layouts that repair the historic building line along Romney Street.
- **Inclusive design:** The proposals appear to have been designed with inclusive design principles in mind and will achieve at least 10% wheelchair adaptable units and Lifetime Homes standards, which is welcomed. A detailed accessibility statement should be secured by planning condition to ensure that inclusive design principles are built through to the detailed design of the proposed building.
- **Sustainable development:** The carbon savings meet the London Plan policy target, however, further information regarding overheating, district heating, the site heat network and CHP should be provided before compliance can be verified. Furthermore, the applicant should provide the carbon emission figure in tonnes per annum for each stage of the energy hierarchy in accordance with the GLA assessment guidance.
- **Transport:** The proposed car parking ratio is considered excessive and should be reduced and electric vehicle charging points supplied in accordance with London Plan standards. In addition, cycle parking provision falls short of London Plan standards and should be addressed a CPZ exemption clause for future residents should be secured, the proposed servicing arrangements should be revised to prioritise the pedestrian environment along Romney Street and a delivery and service, construction logistics and travel plan should also be secured by planning obligation or condition.

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