

# Wembley West End, Montrose Car Park, Wembley

in the London Borough of Brent

planning application no. 15/4473

## 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

Proposed redevelopment of Montrose Crescent car park and land at 499 and 509 High Road, Wembley to include a part three, six, thirteen and eighteen storey development on Curtis Lane and a part four and six storey building on the High Road, Wembley comprising of 186 residential units, 1,312 sq.m. of commercial space comprising A1, A2, A3, A5, B1(a) and/or D1 uses, replacement public car park comprising of 89 public car parking spaces, associated amenity space, landscaping, cycle parking, new lift access to High Road together with alterations to existing stepped access from the High Road to Curtis Lane and Station Grove and public realm improvements.

## The applicant

The applicant is **Ares Properties Ltd** and the architect is **if...architecture**.

## Strategic issues

The proposed **residential-led, mixed-use redevelopment** is supported in accordance with local and strategic planning policy.

However, specific issues relating to **housing, affordable housing, plays space, inclusive design, sustainable development** and **transport** should be resolved prior to the final decision making stage.

## Recommendation

That Brent 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 63 of this report; but that the possible remedies set out in this paragraph could address these deficiencies.

## Context

1 On 28 October 2015 the Mayor of London received documents from Brent 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 9 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 1A of the Schedule to the Order 2008: *"development which comprises or includes the provision of more than 150 houses, flats or houses and flats."*

3 Once Brent 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 approximately 0.5 hectare site comprises the Curtis Lane car park and adjacent vacant site on High Road and is located immediately to the south of Wembley High Road in the London Borough of Brent. The majority of the site is bound by Curtis Lane to the west, north and east, and by Montrose Crescent to the south. The main vehicular access is from Ealing Road to the west via Montrose Crescent and pedestrian access is possible from the High Road via a set of stairs to the north-east of the site to compensate for the significant level change from the High Road site and the car park. The High Road forms part of the Strategic Road Network.

6 Wembley Central station is immediately adjacent to the site to the east and as a result the site records a very good public transport accessibility rating of five; on a scale of one to six, where six is excellent. There are also numerous bus routes serving the bus stops on High Road and Ealing Road in the vicinity, as well as frequent London Underground Bakerloo line and regular London Overground services to Central or North London from Wembley Central Station.

7 With regards to policy designations, the site is within the Wembley Opportunity Area and forms part of the site allocation W1 within the Wembley Area Action Plan (WAAP). The WAAP states the site is suitable for *"comprehensive mixed use development including retail or other town centre uses and retail."* The allocation goes further to state that a replacement town centre car park and amenity/open space should also be provided. The development of this site is also supported by the Wembley West End SPD adopted in 2006 and is considered by the Council to be the next major potential development site within the town centre.

## Details of the proposal

8 The proposals are for the mixed-use development of the existing car park and vacant site on the High Road to provide 186 residential units, 1,312 sq.m. of commercial floorspace comprising A1, A2, A3, A5, B1(a) and/or D1 uses, replacement shoppers' car park and associated amenity space, landscaping and access. The proposals also include alterations to the existing stepped access from the High Road to Curtis Lane and Station Grove and public realm improvements.

9 The development includes buildings of three, six, thirteen and eighteen storeys in height on the car park site and buildings of four and six storeys in height on the High Road.

## Case history

10 The applicant engaged in pre-application discussions with GLA officers regarding the proposals for the site in July 2015. The discussions concluded that the principle of the residential-led, mixed-use redevelopment including the reprovision of a shopper's car park was in general accordance with strategic and local planning policy and was supported. However, there were outstanding issues specifically relating to urban design and a follow-up pre-application meeting was recommended to discuss this issue further. In addition further information and clarification was sought regarding affordable housing, inclusive design, sustainable development and transport.

11 The applicant team subsequently met with GLA officers in early August 2015 to present revised design options for the stepped access and public realm arrangement from the High Road to address the design issues raised at the initial pre-application meeting.

## Strategic planning issues and relevant policies and guidance

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

- |                            |   |
|----------------------------|---|
| • Principle of development | <i>London Plan</i>  |
| • Housing                  | <i>London Plan; Housing SPG; Housing Strategy; draft Revised 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; draft Revised 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; Planning and Access for Disabled People: a good practice guide (ODPM)</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>                |
| • Transport                | <i>London Plan; the Mayor's Transport Strategy; Land for Industry and Transport SPG</i>   |

13 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area are the Brent Core Strategy (2011), the Site Specific Allocations DPD (2011), saved policies from the Brent Unitary Development Plan (2004) and the London Plan (consolidated with alterations since 2011).

14 The following are also relevant material considerations:

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

- Brent Council, Site Allocations DPD & Saved UDP Policies.
- Wembley Area Action Plan (2014).
- The London Plan draft interim Housing SPG (out for consultation).
- Draft Minor Alterations to the London Plan (2015).

## **Principle of development**

### Mix of uses

15 As set out above, the site forms part of a wider site allocation in the Wembley AAP for comprehensive mixed-use, residential-led development including retail or other town centre uses in addition to the retention of town centre car parking facilities. The site is also within the Wembley Opportunity Area which has been identified in the London Plan as having the capacity to deliver 11,500 homes and 11,000 jobs and is considered to be the next major development site in the area. Development in the Opportunity Area should contribute to the regeneration, vitality and viability of Wembley town centre as well as enhancing permeability and connectivity.

16 In addition to the above, London Plan Policy 2.15 promotes London's network of town centres as the main foci beyond the Central Activities Zone for commercial development and intensification, including residential development and that development in town centres should seek to sustain and enhance their vitality. It is noted that the application is accompanied by a retail demand study which concludes that the local occupancy levels are very high, indicating that there is a local demand for commercial accommodation which the proposals will contribute towards. Should the units not be let after a period of marketing, the study also includes a 'meanwhile' strategy which involves exploring the opportunity for 'meanwhile' uses with the Council and Meanwhile charity to help new businesses to establish themselves, while more permanent lettings are negotiated. In addition to the above, the applicant is also offering a commercial unit for community use at a subsidised rent for a period of time. The above strategies are welcomed and will help sustain and enhance the vitality of the town centre in accordance with London Plan policy.

17 In addition to the above, London Plan Policy 3.3 provides strategic support for the provision of housing within London and the delivery of 186 new residential units is supported.

18 Therefore, in light of the above, the principle of the proposed intensification of the application site via a residential-led mixed-use redevelopment to provide 186 residential units including commercial and community floor space, a replacement shoppers' car park and associated amenity space is supported in accordance with local and strategic planning policy.

19 Notwithstanding the above, it is acknowledged that the application site does not cover the entirety of the site allocation boundary. However, given the complex land ownership of those sites that front the High Road and the likelihood of them coming forward for development in the future, the phased development of the wider site is accepted subject to the current development proposals not prejudicing the redevelopment of the remainder of the site in the future.

## Housing

20 The proposals would deliver 186 residential units via the mix illustrated in the table below:

Unit type	Private	Intermediate	Affordable rent	Total units
One bed	32	6	5	43
Two bed	97	2	9	108
Three bed	23	0	12	35
<b>Total</b>	<b>152</b>	<b>8</b>	<b>26</b>	<b>186</b>

### Affordable housing

21 On assessment of the above housing schedule, the applicant is proposing that approximately 18% affordable housing will be delivered as part of the scheme. In response to the requirements of London Plan Policy 3.12, which seeks to secure the maximum reasonable amount of affordable housing) a financial viability assessment has been submitted to the Council to support the proposed level of provision. The viability report, and the financial modelling which underpins it, is currently undergoing a locally-led assessment to verify whether the proposed affordable housing provision would be the maximum reasonable. GLA officers will update the Mayor of the findings of the assessment, and of any further negotiations, at the decision making stage.

22 Within the proposed affordable housing provision, the applicant is proposing a balance of 76% affordable rent and 24% intermediate (shared ownership) units. This is not compliant with London Plan Policy 3.11 which seeks a strategic tenure split of 60:40 (affordable rent:intermediate), or compliant with the Councils preferred tenure split of 70:30 set out within its Core Strategy draft policy DMP15. However, the applicant has stated that this tenure split better reflects the specific local need for higher levels of affordable rent.

23 At this stage it is not possible to determine whether the proposed tenure split is acceptable. Further discussion and confirmation of how the mix has been arrived at, demonstrating that it meets local need, supported by local ward data, whilst also maximising overall provision should be provided. Furthermore, as part of the affordable housing assessment, a policy compliant tenure split scenario should also be tested, to enable an assessment of the impact a strategic compliant tenure split would have on overall housing delivery.

### Mix of units

24 The residential mix achieves a 46% provision of family housing within the affordable rent component of the scheme, responding positively to the strategic aims of London Plan Housing policies 3.8 and 3.11, and strategic guidance set out within the Mayor's Housing SPG (2012).

### Residential standards

25 From the material provided within the submitted design and access statement the residential quality of the units appears to be high. The applicant has set out that all units will meet the Mayor's minimum space standards set out in table 3.3 of London Plan, which is supported. The applicant should provide a detailed accommodation schedule demonstrating the size of each unit to evidence this. As requested in the GLA pre-application advice, the applicant has provided a detailed assessment of the units against the baseline and good practice standards within the Mayor's Housing SPG which demonstrates that the residential design will comply with the baseline standards and many of the good practice standards where relevant.

26 In addition to the above, it is acknowledged that the development will provide of 75% dual aspect units, there will be no single aspect north facing units and each residential core serves less than eight units which is strongly supported in accordance with design principles established in the Housing SPG. Notwithstanding the above, the applicant should confirm the clear floor to ceiling heights.

27 The applicant has carried out a detailed noise assessment which has indicated that baseline noise levels from nearby road traffic has the potential to adversely impact on the quality of the internal residential environment. The assessment recommends a number of mitigation measures including appropriate glazing specifications, facade construction and ventilation methods in order to achieve acceptable internal noise levels. The recommended mitigation should be secured by planning condition.

#### Children's play space

28 Using the methodology in Appendix Two of the Mayor's Shaping Neighbourhoods: Play and Informal Recreation SPG (2012), GLA officers have calculated an overall expected child yield of the development of 52, of which 25 would be aged under five years old. Based on this, the Mayor's SPG indicates that the development would generate a total play space requirement of 520 sq.m. for play and informal recreation, of which 250 sq.m. should be provided on site as a minimum.

29 The applicant has set out an approximate child yield of thirty within the supporting planning statement, but no breakdown of the age profile is provided. Given the disparity with the above calculation, the applicant should provide further information supporting its calculation in addition to a breakdown of the expected ages of the children.

30 The development will provide 1,100 sq.m. of communal amenity space, with the majority located at the podium level between Blocks A, B and C, and at the sixth floor level in the form of a roof terrace. The amenity space will include formal play areas, in addition to informal play opportunities enhanced by sensory planting. This is welcomed, however, further information is required on the size of the dedicated play areas, how this correlates with the overall child yield and the access arrangements for the residents before compliance with London Plan Policy 3.6 can be appropriately assessed. In addition, given the lack of alternative recreational facilities in the area, the applicant will need to demonstrate how the needs for older children will be met by the proposals.

#### Residential density

31 Given the characteristics of the site, the public transport accessibility level of five, 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 906 habitable rooms per hectare which falls comfortably within the suggested ranges in the London Plan.

32 Notwithstanding the above, as set out at the pre-application stage, the applicant should confirm that residential density figures have been calculation in accordance with guidance in London Plan paragraphs 3.30 and 3.31 in support of London Plan Policy 3.4, and the Mayor's Housing SPG (2012).

#### **Urban design**

33 The design of the proposed scheme looks to accommodate the residential accommodation within three linear blocks that sit on top of a podium which accommodates a

parking and servicing court, wrapped in retail uses, and two smaller blocks located on the High Road with commercial at ground floor and residential above.

34 The approach of wrapping the car park and servicing area with other more active uses is strongly supported. At the pre-application stage officers were concerned that the applicant had not maximised these uses and as a result there were extensive stretches of blank frontage along Station Grove and Montrose Crescent. In response to these concerns, the scheme has been revised to include one bed duplex units along Montrose Crescent and increased the size and frontage of commercial units along Station Grove through the rationalisation of refuse and storage space. This results in a significantly improved ground floor layout which will animate the surrounding public realm, ensuring it feels safe and well used.

35 The link between Station Grove and the High Street is strongly supported and the revisions made to this route in response to the pre-application discussions represent significant improvements. The concerns raised with the initial design of this route regarding its lack of prominence and legibility due to its undercroft nature have been satisfactorily addressed, by widening it and opening it to the sky creating a much more inviting space with clear site lines through to the Station Grove and the proposed new commercial street along Curtis Lane. Furthermore, the incorporation of a stepped, south-facing seating area along this route in addition to the standard flight of steps, which has direct access to a commercial/cafe unit on the eastern flank halfway down the steps, also helps transform this route into a new public space where people can stop and enjoy this new destination. This will also help draw high street activity down on to Station Grove and Curtis Lane and potentially improve the viability of the commercial units situated along this route. These are very positive improvements to the scheme originally presented to GLA officers and as set out above are strongly supported.

36 The material provided indicates a high quality of residential design. The height and massing do not raise any strategic issues and as a result of the revisions made in response to the GLA pre-application advice, the scheme is supported in strategic urban design terms.

## **Inclusive design**

### Public realm

37 As expressed at the pre-planning application stage, the design of the landscaping and the public realm is crucial to how inclusive the development is for many people and this is particularly important given the shared surfaces proposed.

38 Curtis Lane is proposed as a shared surface and it is understood that this will also be used as a service access for the commercial units located on either side of the route. The Accessible London SPG provides further detail on the issues posed by shared spaces. In terms of inclusive design, it is the removal of kerbs which can be problematic. Kerbs provide many disabled people with the confidence that they are segregated from traffic, and kerbs can provide blind and partially sighted people with a 'shore line' to follow, to help them navigate an area. Furthermore, careful consideration should also be given to the issue of how to inform people, in particular blind and partially sighted people, that they are travelling from a 'traditional' segregated pedestrian route, into a shared space area, and how to inform them when they are leaving the 'safe zone' onto the shared area.

39 While it is noted from the landscape information that planters are proposed to separate vehicular and pedestrian traffic, the information suggests that these are limited. Overall, the level of information provided in the design and access statement is not sufficient to demonstrate that this potential conflict between the provision of shared spaces and the access requirements

of some people has been resolved. The applicant needs to consider and demonstrate within the landscape design how the scheme will provide clearly defined, safe crossing points for people who are blind or partially sighted, including the correct use of tactile paving and the clear demarcation of car parking bays to ensure the pedestrian routes remain clear and barrier free. As set out at the pre-application stage, in all cases servicing should be minimised and very carefully controlled and clear priority given to pedestrian, cyclists and the quality of the public realm.

40 Another key issue for the development is addressing the significant level change from the High Road to Curtis Lane. The development will provide a large fully accessible glazed lift to enable step free access that will also provide access to the intermediate level where the cafe and stepped seating area is proposed. This is welcomed, as it will enable the enjoyment of this new public space by all, however, as requested at the pre-application stage further information is required with regards to the ongoing maintenance of the lift once completed.

### Residential units

41 The development will provide nineteen wheelchair accessible flats and will be located within Blocks A, B and C. This equates to approximately 10% of the overall number of units which is supported in accordance with London Plan policy. The applicant should confirm that these will be delivered across all tenures and unit sizes and confirm whether these will be accessible from the outset or designed as to be easily adaptable, as it is not clear from the submission.

42 As of 1 October 2015 the Government's technical housing standards came into effect. The Mayor intends to adopt the new technical guidance through a minor alteration to the London Plan. In advance of this the Mayor has released a policy statement setting out that from 1 October 2015 the relevant London Plan policy and associated guidance in the Housing SPG should be interpreted by reference to the nearest equivalent new national technical standard. As such the Council should include a condition to secure the Building Regulation standards M4(2) and M4(3). Compliance with these standards should be demonstrated on plan, using a sample of flat layouts. As set out above, the residential design meets the baseline Housing SPG standards which include many of the Lifetime Homes criteria which is welcomed.

### Parking

43 A total of nineteen disabled car parking spaces are provided within the ground floor basement with access to the residential cores for Blocks A, B and C. This equates to one space per wheelchair accessible unit which is supported in accordance with London Plan policy.

44 In addition, it is recommended that the applicant consider providing storage space and charging points for mobility scooters, in accordance with 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 areas can be used to store adapted cycle or trikes to encourage their use by disabled and older people.

## **Sustainable development**

45 The applicant has applied the energy saving hierarchy detailing savings from energy efficiency measures of 12%, savings of 20% through the provision of Combined Heat and Power (CHP) and further savings from renewable energy of 3%, in this case the applicant is proposing 17 kWp of solar photovoltaic panels (PV) on the roof of the residential blocks. A plan showing the proposed installation of the PV has been provided. The applicant should provide information on how the demand for cooling will be minimised in compliance with London Plan Policy 5.9.



46 Notwithstanding the above, the energy efficiency savings appear high, particularly as the reduction for the residential element of the scheme is quoted as 4% and represents the majority of the building uses. Sample SAP calculation worksheets (both DER and TER sheets) and BRUKL sheets including efficiency measures alone should therefore be provided to support the savings claimed.

47 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. The applicant is proposing to install a site heat network served from a single energy centre on the ground floor. The applicant should confirm that all apartments and non-domestic building uses will be connected to the site heat network.

48 Overall, a reduction of 100 tonnes of CO<sub>2</sub> per year in regulated emissions compared to a 2013 Building Regulations compliant development is expected, equivalent to an overall saving of 35%. The carbon dioxide savings meet 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**

49 The proposal includes a new vehicular access on Curtis Lane for ground and basement car parking, facilitated by the conversion of the southern section of Curtis Lane between Montrose Crescent and the car park access into a two-way system. It is understood that this has been agreed in principle by Brent Council and therefore Transport for London (TfL) has no objection to such arrangement. TfL is pleased that a Stage 1 Road Safety Audit has been submitted which demonstrated that the proposed highway alterations would be acceptable in principle from a safety perspective.

50 The proposal also includes the re-provision of the existing public car park with 89 spaces, reduced from the current 133 spaces, and a further 19 blue badge spaces designated for the proposed residential development only. It is proposed that nine of the public spaces will be provided with electric vehicle charging points along with two of the residential blue badge spaces. In order to comply with London Plan standards, an additional two electric vehicle charging points will need to be provided for the residential provision along with 20% passive provision (or equivalent to a further four spaces). TfL requests that future residents be exempt from eligibility for local parking permits with the applicant entering into a 'permit free' agreement with Brent Council. It is also understood that the applicant has proposed a car club space on Curtis Lane which is supported.

51 The applicant has carried out a pedestrian Environment Review System (PERS) audit has to assess walking conditions in the vicinity of the site which is welcomed. The public realm strategy proposes to widen the Curtis Lane footway in addition to the improved pedestrian link/public space from the High Road to Station Grove, which is also served by a new lift. This will provide better pedestrian accessibility and is strongly supported. The proposed pedestrian improvement measures as well as other improvements identified in the PERS audit should be secured by legal agreement.

52 To improve pedestrian safety, the applicant has further proposed to introduce traffic calming measures on Curtis Lane and Station Grove, this is welcomed by TfL. However, the

applicant should have regard to those comments set out in paragraphs 39 and 40 above regarding inclusive design.

53 The proposal comprises 360 long-term residential cycling spaces, along with a further sixteen visitor spaces on Curtis Lane, which meets the current London Plan cycling parking standards. However, staff cycle parking should also be provided for the commercial units along with shower and changing facilities to encourage staff to commute by cycle. Wider accessible cycle spaces should also be included in accordance with advice in chapter 8 of the London Cycling Design Standards (LCDS).

54 The applicant has identified suggested routes for cyclists in the local area. However, the applicant has not provided a comprehensive assessment of 'cycling level of service' of existing streets and junctions in the vicinity of the site. It is recommended that such an assessment is carried for the streets and junctions in close proximity of the site, in accordance with Chapter 2 of LCDS.

55 In line with London Plan Policy 6.3, trip generation and modal split assessments have been carried out and the methodology is considered acceptable. On assessment of the results, TfL does not consider that the proposal would cause any significant impact on the strategic highway or the rail and underground network.

56 While the development currently benefits from being very well served by a high frequency bus corridor on the High Road, all of the routes (with the exception of Route 92) are currently operating at capacity in the Wembley area. The demand on Routes 83,182 and 204 currently outstrips capacity and with further developments coming forward in the Wembley Opportunity Area, including this one, this is forecasted to continue and be exacerbated. TfL is in the process of finalising a bus strategy for Wembley with the Council in order to cater for the anticipated growth. Although a bus corridor study is about to be undertaken, TfL is of the view that developments will need to contribute towards bus capacity enhancements, potentially through pooling contributions, to accommodate the cumulative impact of developments in the area. Further discussion between TfL, the applicant and the Council to identify and agree an appropriate bus contribution is required, which will help deliver the aims of the emerging bus strategy and provide capacity enhancement to accommodate the cumulative impact of the development in line with London Plan policy 6.7.

57 A draft residential travel plan has been included in the submission; however, it has failed the ATTrBute travel plan assessment as it fails to provide a baseline mode share. The finalised travel plan should address this issue and be secured by condition or section 106 obligation in line with London Plan Policy 6.3.

58 In line with London Plan policy 6.14, a framework delivery and servicing plan has been submitted and this is welcomed. A construction logistics plan should be submitted to Brent Council and TfL for approval and secured by condition.

## **Community Infrastructure Levy**

59 In accordance with London Plan policy 8.3, the Mayor has agreed a CIL Charging Schedule. For the London Borough of Brent, the rate is £35 per square metre of net increase in floorspace.

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

60 At the time of writing the local planning authority's position is unknown.

## Legal considerations

61 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

62 There are no financial considerations at this stage.

## Conclusion

63 London Plan policies on housing, affordable housing, urban design, inclusive design, sustainable development and transport are relevant to this application and overall the scheme is generally supported. However, there are some outstanding issues that need to be resolved before the decision making stage and these and their potential remedies are set out below:

- **Principle of development:** The proposed residential-led, mixed-use redevelopment to provide 186 residential units including commercial and community floor space, a replacement shoppers' car park and associated amenity space is supported in accordance with local and strategic planning policy, subject to the current development proposals not prejudicing the redevelopment of the remainder of the site in the future.
- **Housing & affordable housing:** The proposed housing mix, density and quality standards are generally supported, subject to the submission of a detailed residential schedule. However, as set out above, further discussion is welcomed pending the outcome of the independent assessment of the applicant's viability appraisal regarding the maximum reasonable amount of affordable housing and how the proposed tenure split has been arrived at.
- **Children's play space:** Further clarification is required with regards to the proposed child yield of the development. In addition further information is sought on the size of the dedicated play areas, how this correlates with the overall child yield and the access arrangements for the residents before compliance with London Plan Policy 3.6 can be appropriately assessed. In addition, given the lack of alternative recreational facilities in the area, the applicant will need to demonstrate how the needs for older children will be met by the proposals.
- **Urban design:** The positive engagement with GLA planning officers is welcomed and design revisions made in response to pre-application advice are strongly supported. As a result the scheme is now supported in strategic urban design terms.

- **Inclusive design:** The commitment to providing 10% wheelchair accessible units with associated disabled parking is welcomed. The applicant should confirm that these will be delivered across all tenures and unit sizes and confirm whether these will be accessible from the outset or designed as to be easily adaptable. Furthermore, in accordance with the comments above, the applicant should demonstrate how the shared surfaces proposed will be safe, accessible and provide clearly defined, safe crossing points for people who are blind or partially sighted.
- **Sustainable development:** The carbon dioxide savings meet the target set within Policy 5.2 of the London Plan; however, further information is sought to support the carbon savings from energy efficiency measures alone, how the demand for cooling will be minimised and confirmation that all domestic and non-domestic uses will be connected to the site heat network, before compliance with London Plan energy policy can be verified.
- **Transport:** Further discussion, clarification and/or commitments are required to address those issues set out above regarding electric vehicle charging provision, securing pedestrian improvement measures, provision of staff cycling facilities, a cycling audit, financial contributions towards bus capacity enhancements, the submission of a revised travel plan and the provision of a construction logistics plan.

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