

28 January 2016

The Exchange Shopping Centre Car Park, High Road, Ilford

in the London Borough of Redbridge

planning application no. 4265/15

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

Erection of a podium development above the existing six storey car park to comprise a part 7, part 11, part 26 storey building, consisting of 214 residential units on the sixth to twenty six floors, the reconfiguration of the existing car park layout, access and egress to retain 821 retail parking spaces for the shopping centre and the 95 parking spaces for the residential units, and 300 sq.m. of flexible commercial floorspace (Class A1, A2, A3, A5 and B1 uses), and associated landscaping works (**FULL APPLICATION**)

The applicant

The applicant is **Meyer Bergman** and the agent is **Rolfe Judd**. The architect is **DunnettCraven Architects**.

Strategic issues

The key strategic issues in this case are the **principle of development, housing, urban design, inclusive design, climate change** and **transport**.

Recommendation

That Redbridge Council be advised that whilst the principle of the proposal is supported, the application does not comply with the London Plan, for the reasons set out in paragraph 75 of this report; but that the possible remedies set out could address these deficiencies.

Context

1 On 18 December 2015 the Mayor of London received documents from Redbridge 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 28 January 2016 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 Categories 1A and 1C of the Schedule to the Order 2008:

- *1A: Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats.*
- *1C: Development which comprises or includes the erection of a building in respect of which one or more of the following conditions is met: a) the building is more than 30 metres high and is outside the City of London.*

3 Once London Borough of Redbridge 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.

Site description

5 The 0.48 hectare application site is a large six storey car park with open parking on the roof which is attached to the Exchange shopping centre in Ilford town centre. The Exchange shopping centre extends from Ilford Station to the west to Myrtle Road/Ley Street to the east, however, the redevelopment site only comprises the existing multi-storey car park at the eastern end of The Exchange. The site is therefore bounded to the north by Thorold Road, to the east by Myrtle Road, to the south by adjacent commercial buildings (and the railway beyond) and to the west by The Exchange shopping centre.

6 The site lies within the Ilford Opportunity Area where capacity for a minimum of 5,000 new homes and 800 new jobs has been identified over the London Plan period to 2036. The site also falls within the Ilford Town Centre Area Action Plan (AAP) boundary and the Ilford Town Centre Housing Zone, for which the Mayor has pledged financial support to assist in the delivery of 2,189 new homes.

7 In terms of transport, Ilford station is located 200 metres west of the site serviced by TfL rail and will be served by Crossrail from 2017. The nearest bus stops are located on Cranbrook Road adjacent to the station, less than 250 metres to the west of the site. Consequently, the site benefits from an 'excellent' Public Transport Accessibility Level (PTAL) of 6a. The nearest section of the Strategic Road Network (SRN) is Cranbrook Road which is just west of the site. The nearest part of the Transport for London Road Network (TLRN) is the A406, North Circular, located approximately 600 metres west of the site.

Details of the proposal

8 The proposal seeks to redevelop the site to provide a mixed-use residential-led podium development above the existing six storey car park. The proposal includes a part 7, part 11 and part 26 storey building (an additional 20 floors) with 214 residential units on the sixth to twenty six floors; the reconfiguration of the existing car park layout, access and egress to retain 821 retail parking spaces for the shopping centre and 95 car parking spaces for the residential units; and new small retail/restaurant/office units at ground floor level to service the future development and surrounding area and to create activity along the primary street frontages.

Case history

9 On 18 August 2015 a GLA pre-application meeting was held at City Hall to discuss the scheme. GLA officers broadly supported the residential-led redevelopment of this site in the

advice note issued on 2 September 2015. However, issues were raised at the meeting with regard to design and car parking. The applicant was also advised to ensure that other issues with respect to affordable housing, access, climate change and transport in general were appropriately addressed by the planning submission.

Strategic planning issues and relevant policies and guidance

10 The relevant issues and corresponding policies are as follows:

- | | |
|---------------------------|---|
| • Retail/Town Centres | <i>London Plan; Town Centres SPG</i> |
| • Housing | <i>London Plan; Housing SPG; Housing Strategy; draft Interim Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG; Shaping Neighbourhoods: Character and Context SPG</i> |
| • Affordable housing | <i>London Plan; Housing SPG; Housing Strategy; draft Interim Housing SPG</i> |
| • Density | <i>London Plan; Housing SPG; draft Interim Housing SPG;</i> |
| • Urban design | <i>London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG</i> |
| • Tall buildings/views | <i>London Plan;</i> |
| • Inclusive Access | <i>London Plan; Accessible London: achieving an inclusive environment SPG;</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 and Parking | <i>London Plan; the Mayor's Transport Strategy;</i> |
| • Crossrail | <i>London Plan; Mayoral Community Infrastructure Levy</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 are Redbridge Council's Core Strategy Development Plan Document (March 2008), the Borough Wide Primary Policies Development Plan Document (May 2008), the Development Opportunity Sites Development Plan Document (May 2008), Ilford Town Centre Area Action Plan (May 2008), and the 2015 London Plan (consolidated with Alterations since 2011).

12 The following are also relevant material considerations:

- Minor Alterations to the London Plan: Housing Standards and Parking Standards (Draft 2015)
- The National Planning Policy Framework, Technical Guide to the National Planning Policy Framework and National Planning Practice Guidance.

Principle of development – town centre regeneration and housing

13 The site is within Ilford Town Centre, identified in the London Plan as a ‘Metropolitan Town Centre’ in Outer London. London Plan Policies 2.15 and 4.7 promote new commercial and housing uses in town centre locations. London Plan Policy 3.3 seeks to increase London’s supply of housing and in doing so sets borough housing targets, of which Redbridge’s annual target is 1,123 additional homes per year between 2015 and 2025, which the proposals will contribute towards. The Housing Zone designation for the wider town centre also supports the accelerated delivery of new homes.

14 The site is also within the Ilford Opportunity Area as designated on London Plan Map 2.4 and Annex 1. London Plan Policy 2.13 states that development in Opportunity Areas is expected to optimise residential and non-residential densities and to contain a mix of uses.

15 The proposals are for the delivery of 214 residential units across the development and 300 sq.m. of flexible commercial floorspace at ground level (Class A1, A2, A3, A5 and B1 uses).

16 The proposal for a residential-led mixed use development is therefore consistent with the policy aspirations for the area and has strong strategic support.

Housing and affordable housing

17 The application proposes 214 residential units in total. The proposed delivery of these new homes is strongly supported in accordance with London Plan Policy 3.3. A detailed housing schedule is provided below:

	Private	Affordable	Total
studio	71	-	71 (33%)
1 bed	53	-	53 (25%)
2 bed	72	12	84 (39%)
3 bed	2	4	6 (3%)
Total	198 (92.5%)	16 (7.5%)	214 (100%)

Table 1: Residential unit breakdown of size and tenure

Affordable housing

18 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. Policy 3.12 also states that affordable housing should normally be provided on-site.

19 The applicant is proposing to deliver 16 affordable housing units (7.5%) on site, all as affordable rented units. The applicant has stated that this is assuming no grant funding is available for affordable housing. The applicant has also advised that the proposed tenure follows the recommendation of the Council to meet the greatest housing needs in the borough. The applicant has submitted a viability appraisal in line with London Plan Policy 3.12 in order to demonstrate that the level of affordable housing provision is the maximum reasonable amount the scheme can deliver. This is currently being independently assessed by consultants on behalf of Redbridge Council.

20 At this stage, and given that the site is in a designated Housing Zone, GLA officers consider that the overall initial offer is very low and the applicant is asked to re-visit this. It is important that the costs, assumed rent levels and growth modelling (in light of the impact of

Crossrail) are carefully scrutinised and that, as advised at pre-application stage, full account is taken of the retained car park and values generated from the car parking spaces. Furthermore, as the site is in a designated Housing Zone, the applicant should continue negotiations with the Council to establish what could potentially be achieved with GLA subsidies to maximise the amount of affordable housing on site.

21 Whilst the proposed tenure is not in accordance with the strategic tenure split target established in London Plan Policy 3.10, if it can be confirmed by the Council that the provision of affordable rent units meet local needs, a variation from strategic policy would be acceptable.

22 Both the viability appraisal and the independent assessment should be shared with GLA officers before the application is referred back to the Mayor at stage 2 in order to assess compliance with London Plan Policy 3.12, notably that the maximum reasonable amount of affordable housing is being achieved.

Housing choice

23 London Plan Policies 3.8, 3.9 and 3.11, together with the Mayor's Housing SPG and the Housing Strategy, seek to promote housing choice and to ensure that mixed and balanced communities are created in new development through, for example, the provision of a mix of tenures and unit sizes across the development, including the priority need for affordable family sized units.

24 Table one provides the indicative unit mix at this stage, which shows that the development will provide studios, one, two and three bedroom dwellings. It is noted that no family units were proposed at pre-application stage and that the proposal now includes 6 units for families, including 4 units that will be affordable family homes. While this is welcomed, the number of three-bedroom units, which equates to 3% across the proposed development remains low. Whilst it is acknowledged that this is a town centre location, where there is a demand for smaller units and that there are density and design constraints for traditional family housing types, Redbridge Council should satisfy themselves that the proposed mix meets local needs for family housing.

25 Policy 3.8 also requires all new housing to be built to 'Lifetime Homes' standards. In order to bring the London Plan into line with new national housing standards, the draft Minor Alterations to the London Plan (MALP) proposes to replace this with "ninety percent of new housing meets Building Regulation requirement M4(2) 'accessible and adaptable dwellings'". Policy 3.8 also requires 10% of units to be wheelchair accessible or easily adaptable, which the draft Minor Alterations to the London Plan proposes to replace this with "ten per cent of new housing meets Building Regulation requirement M4(3) 'wheelchair user dwellings', i.e. is designed to be wheelchair accessible, or easily adaptable for residents who are wheelchair users". In advance of the MALP, a Housing Standards Policy Transition Statement sets out how the existing housing standards should be applied from October 2015. This is also set out in the draft Interim Housing SPG, alongside the other London standards which are not affected by the introduction of national standards.

26 The application has advised in its submitted documents that all residential accommodation would be designed to Lifetime Homes standards with 10% of the units designed to be wheelchair accessible, or capable of easy adaptation. The Council should secure M4(2) and M4(3) requirements by condition, including the submission of a plan to identify which units will be 'wheelchair user dwellings', prior to commencement, to ensure the design of a scheme has considered the standard.

Residential density

27 London Plan Policy 3.4 requires development to optimise housing output for different locations taking into account local context and character, design principles set out in London Plan Chapter 7 and public transport capacity. Table 3.2 provides the Sustainable residential quality (SRQ) density matrix in support of this policy. Based on the characteristics of the location, the site is within a 'central' setting being within a Metropolitan town centre, with a high PTAL. For a 'central' setting with a PTAL of 6a, the density matrix suggests a residential density in the region of 650-1,100 habitable rooms per hectare and 140-405 units per hectare.

28 The applicant proposes a density of 735 habitable room per hectare and 446 units per hectare. The applicant should confirm that this has been calculated based on the methodology for mixed use development set out within paragraphs 1.3.62 - 63 of the Mayor's draft Interim Housing SPG 2015.

29 As currently presented the proposed density is within the London Plan density range in terms of habitable rooms per hectare but exceeds the London density range in terms of units per hectare. In the context of the imminent arrival of Crossrail services, the proposed density would be acceptable.

Residential quality

30 London Plan Policy 3.5, Table 3.3 and Annex One of the Housing SPG set out requirements for the quality and design of housing developments, including minimum space standards for new development.

31 The residential quality proposed is generally high. It is noted, and welcomed, that the units meet or exceeds the minimum space standards within Table 3.3 and that each residential unit within the scheme is provided with private amenity space (in the form of gardens, balconies or terraces) which also meets or exceeds the London Plan standards. The proposed communal amenity space within the podium gardens on the sixth floor is also welcomed. Further comments on residential quality are made in the urban design section of the report below.

Children's play space

32 Children and young people need free, inclusive, accessible and safe spaces offering high-quality play and informal recreation opportunities in child-friendly neighbourhood environments. Policy 3.6 of the London Plan states that development proposals that include housing should make provision for play and informal recreation, based on the expected child population generated by the scheme and an assessment of future needs.

33 The applicant has carried out an assessment of existing local play provision and based on the GLA calculation set out in the Mayor's Shaping Neighbourhoods: Play and Informal Recreation SPG has calculated a requirement for 293 sq.m. of play space to be delivered on site for all age groups. The applicant proposes that 241 sq.m. of formal and informal/natural play elements for the under 5s and 5-11 year group is provided within the podium gardens. For children over 12, the applicant has shown that Valentine Park is located within the Mayor's recommended safe travel distances from the site and provides suitable play provision for this age group.

34 Whilst the applicant's play strategy is acceptable in principle, the applicant should confirm that the sharing of the space by children of different tenures will not raise any issues in terms of the management and maintenance of the play space with any future registered providers. Furthermore, it should demonstrate that the children's play area has been designed to be inclusive in terms of the environment created and the equipment provided in line with

London Plan Policy 3.6 and the Mayor's Play and Informal Recreation SPG. The detailed design and minimum quantum of play space should be secured by condition.

Urban Design

35 Good design is central to the objectives of the London Plan and is specifically promoted by the policies contained within chapter seven which address both general design principles and specific design issues. The Town Centres SPG sets out guidance on the design of town centre development and the Housing SPG sets out guidance for residential design.

36 As discussed at pre-application stage, the principle of utilising the car park roof to provide housing in this town centre location is supported in strategic urban design terms as town centres are identified as one of the major locations for intensifying housing delivery in London. However, the difficulties of working with the existing car park structure to provide a high quality of public realm, routes towards the residential cores, and an exemplary standard of architecture and residential amenity are acknowledged, and officers remain unconvinced that the current scope of the proposals is sufficient to address these requirements. Officers would like to work with the developer to resolve these issues.

37 The applicant has responded positively to the comments made at pre-application stage and is proposing to include 300 sq.m. of flexible commercial spaces at ground level. The introduction of two retail services spaces along the north east and north west ground floor frontages of the car park to provide street-based activity and passive surveillance to the public realm is welcomed, however, as the units are small and set back from the main shopping streets, it would be helpful to provide officers with further information on the future use of those units.

38 The applicant has worked to improve the legibility of the pedestrian route running through the car park to the shopping centre entrance. Notwithstanding this, officers remain concerned that the residential access corridor towards the core remains long and enclosed, and in the absence of any natural daylight or ventilation is likely to feel oppressive. The quality of this corridor space will be further impacted on by the adjoining refuse store and the shared access to cycle storage. Along with other design factors, the provision of a welcoming and high quality residential entrance area is critical to the acceptability of developing a constrained and challenging site such as this, along with the inclusion of a tall building. Officers remain unconvinced that the proposal will deliver a sufficiently high quality access route to the rooftop/podium level, and the applicant should continue to explore alternative arrangements.

39 An alternative way to improve the residential entrance area while keeping the tower in its current location may be to add an additional core on the eastern corner of the car park, immediately off the street and to keep the tower's access core on the southern corner of the site. This would avoid the need for a long access corridor at ground level, and enable refuse/cycle storage to be contained behind the lift core. It may also provide an opportunity to widen and open up the pedestrian route into the shopping centre. The residents would be able to access the tower core from the podium or directly via the shopping centre.

40 As a minimum requirement, the applicant should explore means of opening up the proposed residential access corridor to be accessed directly from the pedestrian link within the car park. This would provide direct access to the shopping centre for residents, and open up the corridor.

41 Notwithstanding the above, the submitted plans indicate that a high quality of accommodation at car park roof level can be secured, with efficient core to unit ratios, and a

reasonable proportion of dual aspect across the scheme. The east/west orientation of the blocks enables potential for good daylight/sunlight penetration, however, ADF studies should be conducted to confirm this. All units should be designed to achieve 2,500mm floor to ceiling heights to further optimise daylight levels and a sense of space. The applicant's noise assessment recommends that acoustically treated ventilation is provided to the habitable rooms. Noise mitigation measures to reduce the level of noise from the railway line and the servicing yard should be secured by condition by the Council.

42 The lower blocks are arranged to provide enclosure to the central communal amenity spaces, and the drawings suggest that the adjoining car park's roof (part of the site boundary) is also proposed to be accessible to provide additional residential amenity. The applicant should confirm the nature of this space, and demonstrate how it will be designed to provide a safe and inclusive environment.

43 The form and massing strategy is broadly supported, however, this is in the context of building on top of a six storey building, and the design and appearance of the new build elements visible from street level along the east and south edges of the car park should be carefully considered to form a successful composition with the car park frontages. The proposed measures to include green walling to the car park to soften its appearance are supported, however, the amount of greenery should be maximised and a detail of a full irrigation system secured through condition to ensure that this is delivered.

44 As set out above, the principle of building on the car park roof could create a number of technical and structural difficulties, particularly in relation to the tall building. This would be detrimental to the need to secure the highest possible standards of build quality and architecture. It is understood that the structural loading of the car park would necessitate a pre-fabricated build approach with relatively lightweight cladding elements, including the proposed use of brick slips. While this may be appropriate for the lower scale linear blocks, officers question the appropriateness of this approach for the tower, as it is likely to result in a homogenous and overbearing appearance. The applicant should therefore explore the use of alternative high quality facing materials and provide further detail on the structural make-up of the tower in relation to the car park structure, and its build quality to demonstrate that it would be designed for longevity and ease of maintenance, and to secure an exemplary residential building. In addition, the intention to provide a cantilever to provide shelter at the base of the tower/entrance to the podium deck is also questioned, and particular attention should be given to the detailing and design of this, including the appearance of the underside of the tower.

45 With regard to heritage, none of the buildings on the site are listed but there are two Grade II listed buildings nearby (the Town Hall and the Bank). The Council should be satisfied that the proposed development does not have a detrimental impact on the setting of the listed buildings.

46 Officers would welcome further discussion on the points raised above before the scheme is referred back to the Mayor at Stage 2.

Inclusive design and access

47 Inclusive design principles if embedded into the development and design process from the outset help to ensure that everyone, including older people, disabled and deaf people, children and young people, can use the places and spaces proposed comfortably, safely and with dignity. The aim of London Plan Policy 7.2 is to ensure that proposals achieve the highest standards of accessibility and inclusion.

48 As stated in the housing section of this report, it should be clear on the plans where the wheelchair accessible/ adaptable flats are located and how many there are. These should be distributed across tenure types and flat sizes. A plan should be submitted and secured by the Council to identify which units will be 'wheelchair user dwellings', prior to commencement, to ensure the design of a scheme has considered the M4(2) and M4(3) standards.

49 The applicant should also clarify whether blocks A and D comply with the Building Regulations in terms of level access.

50 The shop mobility unit that is currently at ground level will be reprovided in the proposed scheme. This is welcomed and disabled car parking bays located at ground level should be shown on plans.

Climate change mitigation

Energy efficiency standards

51 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 mechanical ventilation with heat recovery.

52 The applicant should outline the measures taken to avoid overheating and minimise cooling demand in line with Policy 5.9. Evidence should be provided demonstrating that the risk of overheating has been reduced to acceptable levels. Dynamic overheating modelling in line with CIBSE Guidance TM52 and TM49 is recommended.

District heating

53 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.

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

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

Combined Heat and Power

56 The applicant has investigated the feasibility of CHP. However, due the intermittent nature of the heat load, CHP is not proposed. This is accepted in this instance.

Renewable energy technologies

57 The applicant has investigated the feasibility of a range of renewable energy technologies and is proposing to install a 177kWp (1,320 sq.m.) roof mounted Photovoltaic (PV) array.

58 The applicant has estimated that the required PV could be accommodated based on an available roof area of 1,900 sq.m. However, taking into account spacing for plant, shading and maintenance access there is concern that the roof area will not be sufficient. The applicant should therefore provide an indicative roof layout detailing the PV panel in order to demonstrate that there is sufficient space to accommodate the proposed PV array and that it is free from significant shading.

Overall carbon savings

59 A reduction of 83 tonnes of CO₂ 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.

Climate change adaptation

Flooding and sustainable drainage

60 A Flood Risk Assessment (FRA) accompanies the application and confirms that the site is within Flood Zone 1 and has no significant surface water flood risks. The development is therefore acceptable in principle in terms of London Plan Policy 5.12. Whilst the site is not at significant risk of surface water flooding, there are areas of more significant surface water flood risk affecting the wider the local area, it is therefore important that the proposals are designed to minimise surface water run-off in line with London Plan Policy 5.13. Given the nature and location of the proposals, the opportunities to manage rainwater on site are recognised as being limited.

61 The FRA confirms that the surface water run-off will be attenuated by the green roof and podium level landscaping (including a linear water feature). These features should be designed to maximise their rainwater attenuation capacity in order to comply with the requirements of London Plan Policy 5.13 and this aspect of the development should be secured at a more detailed level via the application of a suitable planning condition.

Transport

Trip generation / modal split

62 The modal split and trip generation methodology is appropriate.

Public transport

63 Given the location in a metropolitan town centre with a variety of transport choices, no site specific capacity concerns with any particular bus or rail route are raised.

Car parking

64 The reduction in the total number of car parking spaces is welcomed given that the current car park is never used at full capacity. However, an allocation of 95 spaces for the residential units (parking ratio of 0.44) is considered too high for both a town centre location with a high PTAL and a variety of public transport options, and importantly, a location soon to be served by Crossrail. Comments were raised about the issue at pre-application stage. While it is understood that these spaces are existing rather than being built, the space should be

redesigned and reutilised for more sustainable and environmentally pleasing uses such as cycle parking and storage units for residents.

65 While at pre-application stage discussions were had about the possibility of monitoring the number for car parking spaces within the travel plan to allow for adjustments based on demand in practice. TfL requested that a much lower ratio be offered first and increased if necessary rather than the other way around.

66 It is also proposed that 21 residential car spaces are allocated for disabled parking. Blue badge parking and electric vehicle charging points should be provided in accordance with London Plan standards and a car parking management plan should be supplied. In addition, residents should be exempt from securing CPZ parking permits. This should be secured as part of the S106 agreement.

Cycle parking

67 There will be 304 secure spaces provided for residents. Provision is mostly at ground level, generally located with easy access within the site. This provision is in accordance to London Plan standard for the residential element which is welcomed. However, the split of long-term and short-term cycle parking should also be stated.

68 Further clarification is required on how many (if any) cycle parking spaces will be provided for the commercial elements of the site and the applicant should also confirm that supporting services (lockers, showers, changing facilities) are provided for those employed in the commercial element.

Travel, construction & logistics, and delivery and servicing plans

69 The submission of a framework travel plan is welcomed. The travel plan should be secured, enforced, monitored and reviewed as part of the S106 agreement. A delivery and servicing plan (DSP) (or inclusion in the travel plan) and a construction and logistics plan (CLP) will need to be secured via condition.

Conclusion

70 Due to the high PTAL nature of the development, it is unlikely to have a significant impact on the surrounding highway or public transport networks. However, given the site's location, a lower parking provision must be achieved in order to support the sustainable aspirations of the London Plan. Further clarifications should be supplied on cycle parking. CLP, DSP and travel plan should be secured by condition or through the s106 agreement.

Mayoral Community Infrastructure Levy

71 In accordance with London Plan Policy 8.3, the Mayor commenced CIL charging for developments permitted on or after 1 April 2012. It is noted that the proposed development is within the London Borough of Redbridge, where the Mayoral charge is £20 per square metre Gross Internal Area (GIA). Additionally, the mechanism for contributions to be made payable towards Crossrail has been set out in the Mayor's Supplementary Planning Guidance 'Use of planning obligations in the funding of Crossrail and the Mayoral Community Infrastructure Levy' (April 2013) and London Plan Policies 6.5 and 8.3.

Local planning authority's position

72 Officers at Redbridge Council are generally supportive of the application and the delivery of new homes but have raised some issues with regard to affordable housing, the design and architecture of the scheme and the high car parking provision.

Legal considerations

73 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. 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

74 There are no financial considerations at this stage.

Conclusion

75 London Plan policies on principle of development, housing, urban design, inclusive access, sustainable development and transport are relevant to this application. Whilst the scheme is broadly supported in principle, the application does not comply with the London Plan for the following reasons:

- **Principle of development:** The proposal for a residential-led mixed use development is consistent with the policy aspirations for the area and has strong strategic support.
- **Housing:** The provision of new homes is welcomed and will help deliver the aspirations for Ilford Town Centre and the Housing Zone. At this point, GLA officers are unable to offer a clear steer on London Plan compliance with regard to affordable housing, pending the independent assessment of the applicant's viability appraisal to ensure the maximum reasonable amount of affordable housing is being delivered. The Council should be satisfied with the proposed tenure and unit mix. The M4(2) and M4(3) requirements should be secured by condition. Further information on the proposed density is required. The applicant's play strategy is acceptable in principle but further information on the management of the play space should be provided. The detailed design and minimum quantum of play space should also be secured by condition.
- **Urban design:** Officers are supportive of a high rise, high density scheme. However, there are a number of issues that require further resolutions as set out in the main report and officers would like to work with the local planning authority and the developer to resolve those issues. Further information should be provided on the residential and shopping entrances, the commercial units that are proposed to activate the street, the treatment of the adjoining car park's roof and the quality of the residential units in terms of daylight/sunlight penetration. A condition should secure the delivery of the proposed green wall and its full irrigation system.
- **Inclusive access:** The M4(2) and M4(3) requirements should be secured by condition and a plan should be submitted to identify which units will be 'wheelchair user dwellings'. The location of the disabled parking bays near the shop mobility unit should be identified on plans.

- **Climate change:** The carbon dioxide savings meet the London Plan target set within Policy 5.2. However, further information should be provided on overheating and cooling demand district heating and the proposed PV panel before compliance with London Plan energy policy can be verified. The proposed measures to attenuate surface water run-off on site should be secured by condition by the Council.
- **Transport:** Given the site's location, a lower parking provision must be achieved in order to support the sustainable aspirations of the London Plan. Further clarifications should be supplied on cycle parking. CLP, DSP and travel plan should all be secured by condition or through the s106 agreement.

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