

## Stroudley Walk, Bow

in the London Borough of Tower Hamlets

planning application no. PA/10/00373 and PA/10/00374

### Strategic planning application stage 1 referral (new powers)

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008

### The proposal

Two separate applications for the same site are considered in this report:

- 1) Outline planning permission for estate renewal comprising re-development to provide 134 flats in a range of buildings, including a sixteen-storey tower (52 metres), together with community uses and ground floor retail space.
- 2) Full planning permission for construction of Phase 1 comprising erection of part three/part five storey building to contain nineteen residential units.

### The applicant

The applicant is **Poplar Harca**, and the architect is **Levitt Bernstein**.

### Strategic issues

The principle of the **redevelopment of the estate** is supported. Justification and clarification is required as to the amount of **affordable housing, housing mix, and tenure** that are proposed, including the availability of **social housing grant**.

Further detail is also required into **children's playspace, inclusive design, transport and climate change** before the scheme can be considered to be acceptable.

### Recommendation

That Tower Hamlets 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 88 of this report; but that the possible remedies set out in paragraph 90 of this report could address these deficiencies.

### Context

1 On 18 March 2010 the Mayor of London received documents from Tower Hamlets 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 April 2010 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 outline application is referable under Category 1C of the Schedule to the Order 2008: "Development which comprises or includes the erection of a building of one or more of the following descriptions ... (c) the building is more than 30 metres high and is outside the City of London."

3 Once Tower Hamlets 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 Stroudley Walk forms part of the Bow Bridge Estate, providing a north-south pedestrian route connecting Bromley High Street and Bruce Road. It currently contains an 11 storey tower (Warren House) constructed in the early 1960's, a row of shops with dwellings above built in the 1980's, a GP surgery, open space (some of which is used as informal market trading), and a car park. The total number of dwellings in the development is 52 (22 one-bed and 30 two-bed units).



Figure 1: Aerial photograph of site (Source: Design and Access Statement)

6 Directly adjacent to the north/north-west is Fairlie Court which is accessed from Rainhill Way. This contains shops, a post office with dwellings above, rising to four storeys. The now closed Rose and Crown Public House sits within this development, facing the application site. Beyond Rainhill Way to the north is Bow Road, which is connected to the site via Bromley High Street.

7 To the west of the site is Regent Square, a series of 3 storey residential blocks accessed from Bruce Road, with St Agnes Primary School sitting to the north of this. A pedestrian route runs

from Stroudley Walk, past Regent Square to the school. Beyond Regent Square are three 23 storey tower blocks facing Rainhill Way. To the east is Arrow Road, a residential street of terraced houses, flanked by three 11-storey towers. Bruce Road and Devons Road are to the south, and contain a mix of terraced housing and local authority blocks.

8 The nearest section of the Transport for London Road Network (TLRN) is the A11 Bow Road, which lies 150m to the north of the site, beyond Bromley High Street. The A11 meets the A12 Blackwall Tunnel Approach (also part of the TLRN) at the Bow interchange, 360m to the northeast.

9 Nine bus routes (8, 25, 108, 205, 276, 323, 425, 488 and D8) can be accessed within 400m of the site. Bow Church Docklands Light Railway (DLR) station lies 250m to the northwest, with Bromley-by-Bow underground station (District and Hammersmith & City lines) some 450m to the south-east.

## **Details of the proposal**

10 The applicant has submitted an outline planning application for redevelopment of Stroudley Walk, with a series of five blocks proposed, ranging in height from three to six storeys, together with a 16 storey tower (in the place of Warren House). A total of 134 flats (51 one-bed, 40 two-bed, 28 three-bed, 12 four-bed and 3 five-bed units) are proposed, together with a ground floor retail unit and a community facility.

11 A detailed planning application has also been submitted which is for part of the application site. This application is 19 dwellings within a five storey block.

12 The scheme would feature a new redesigned square, with the existing (listed) local pub as a focal point (but outside the application site), together with public open space and play space. A new one-way street with traffic calming measures is proposed, with on street parking being provided.

## **Case history**

13 There have been no previous planning applications of a strategic nature in relation to this site.

14 The applicant engaged in pre-application discussions with GLA officers in November 2009.

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

15 The relevant issues and corresponding policies are as follows:

- Regeneration *London Plan;*
- Housing/affordable housing *London Plan; PPS3; Housing SPG; Providing for Children and Young People's Play and Informal Recreation SPG, Housing Strategy; draft revised interim Housing SPG*
- Density *London Plan; PPS3; Housing SPG; draft revised interim Housing SPG*
- Urban design *London Plan; PPS1*
- Tall buildings/views *London Plan; RPG3A, View Management Framework SPG, draft Revised View Management Framework SPG*

- Children’s play space *London Plan; PPS3; Housing SPG; Providing for Children and Young People’s Play and Informal Recreation SPG, Housing Strategy; draft revised interim Housing SPG*
- Inclusive design and access *London Plan; PPS1; Accessible London: achieving an inclusive environment SPG; Planning and Access for Disabled People: a good practice guide (ODPM)*
- Climate change *London Plan; PPS1, PPS1 supplement; PPS3; PPG13; PPS22; draft PPS Planning for a Low Carbon Future in a Changing Climate; the Mayor’s Energy Strategy; Mayor’s draft Climate Change Mitigation and Adaptation Strategies; Mayor’s draft Water Strategy; Sustainable Design and Construction SPG*
- Transport/parking *London Plan; the Mayor’s Transport Strategy; draft replacement Transport Strategy; PPG13;*

16 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 1998 Tower Hamlets Unitary Development Plan and the London Plan (Consolidated with Alterations since 2004). The Tower Hamlets Core Strategy (pre-submission stage) and draft replacement London Plan are also a material considerations.

## **Principle of development**

17 London Plan policy 3A.29 ‘supporting neighbourhood plans’ states “*The Mayor will encourage communities and neighbourhood-based organisations to prepare planning frameworks or neighbourhood plans based upon identifying local economic, social, physical and environmental needs and opportunities to strengthen local Neighbourhood Renewal Strategies*”. The Mayor encourages boroughs to adopt locally prepared frameworks or plans including those prepared by housing association-led estate regeneration schemes, Development Trusts and Urban Regeneration Companies as supplementary planning documents.

18 The estate is owned by Poplar HARCA, which owns and manages 8,500 ex-Council homes in the Poplar Area. Over the past two years, Poplar HARCA have embarked on a renewal programme for these estates, called ‘Reshaping Poplar.’ This document has been development in partnership with Tower Hamlets Council and whilst not a masterplan or policy document, it does set out the key issues, priorities and principles that Poplar HARCA wishes to promote. The aspirations of Poplar HARCA in undertaking this regeneration scheme are in accordance with policy 3A.29.

19 The London Plan, in seeking to increase London’s housing supply and maximise the potential of individual sites, focuses on securing housing choice and the maximum reasonable amount of affordable housing (policies 3A.1, 5 and 10). The corresponding policies are set out in Chapter 3 of the draft replacement London Plan.

20 The approach employed by the GLA when assessing estate renewal is to take into account the regeneration benefits to the local community, the proportion of affordable housing in the surrounding area, and the amount of affordable housing being, or planned to be, provided elsewhere in the borough.

21 Policy 3A.15 of the London Plan provides guidance to boroughs preparing DPDs regarding the loss of housing including affordable housing, stating that DPDs should prevent the loss of housing, including affordable housing, without its planned replacements at existing or higher densities. This is re-iterated under policy 3.15 which goes on to state that at least equivalent floorspace should be provided in housing redevelopments. Section 20 of the Housing SPG provides further guidance on this matter, stating that estate regeneration schemes should be

undertaken on the basis of no net loss of housing or net loss of affordable housing. The guidance also states that replacement of social rented units with intermediate units may be acceptable where this can be justified to achieve a wider range of types of provision. These aspects are discussed in detail below.

22 The retail offer in the scheme is comparable to the existing provision, and raises no strategic issues. The provision of community facilities is also supported. As part of any planning permission, training and employment opportunities for local people should be secured by way of the section 106 agreement.

## Housing – affordable housing

23 As stated above, the Mayor’s Housing SPG notes that estate regeneration and redevelopment schemes should be undertaken on the basis that a) there is no net loss of housing provision and b) there is no net loss of affordable housing provision.

24 The scheme is made up of the following:

Table 1: Proposed housing mix

Unit Type	Unit Tenure			Total by Unit Type	Total by Unit Type (%)	Housing SPG
	Market	Affordable				
		Intermediate	Social			
Studios	0	0	0	0	0%	1%
1-bed	35	5	11	51	38%	31%
2-bed	21	5	14	40	30%	38%
3-bed	9	3	16	28	21%	
4-bed	4	0	8	12	9%	30%
5-bed	0	0	3	3	2%	
<b>Total by Tenure</b>	<b>69</b>	<b>13</b>	<b>52</b>	<b>134</b>	<b>100%</b>	<b>100%</b>
Total by Hab Rooms	<b>193</b>	<b>37</b>	<b>197</b>	<b>427</b>		
Total by Tenure (%)	45%	9%	46%	100%		
Tenure split		<b>20%</b>	<b>80%</b>			

### Re-provision of affordable housing/tenure split

25 The current estate comprises fifty social rented units made up of one and two bedroom flats (21 one bed and 29 two bed units). There are also two privately owned units. The proposed development incorporates 52 social rented units, with 197 habitable rooms, together with a further 13 shared ownership units. The applicant has demonstrated in that the design and size of the proposed units are equal to, or more generous than existing units, in accordance with the London Plan and the Housing SPG.

26 Paragraph 20.2 of the Housing SPG notes that “Replacement of social rented units by intermediate provision may be acceptable where this can be justified by a requirement to achieve a wider range of types of provision in a neighbourhood”. The applicants have noted an intention to address the mono-tenure of the estate by introducing intermediate accommodation. At present, this is proposed to be 9% of the total offer, resulting in an 80:20 split between social rented and shared ownership. This is acceptable and in accordance with London Plan policies, which enables

the introduction of mixed tenure in estate renewal schemes, so as to provide mixed and balanced communities.

27 The application documentation does, however, suggest that the suggested housing mix is a guide, and the precise mix and tenure split may vary once the detailed planning applications for each phase is worked up. Whilst it is suggested that additional affordable housing may be achieved, the applicant has also stated that they are only prepared to commit to at least 35% affordable housing. This could lead to a reduction in the level of affordable housing to below the existing situation, which would run contrary to London Plan policies and the Housing SPG, in the absence of any justification. There would also need to be further discussion regarding the possibility of the tenure being altered at a later stage as this too may impact upon the overall affordable housing offer.

### Viability

28 London Plan Policy 3A.10 requires borough councils to seek the maximum reasonable amount of affordable housing when negotiating on individual private residential and mix-use schemes. In doing so, each council should have regard to its own overall target for the amount of affordable housing provision. Policy 3A.9 states that such targets should be based on an assessment of regional and local housing need and a realistic assessment of supply, and should take account of the London Plan strategic target that 35% of housing should be social and 15% intermediate provision, and of the promotion of mixed and balanced communities. In addition, Policy 3A.10 encourages councils to have regard to the need to encourage rather than restrain residential development, and to the individual circumstances of the site. Targets should be applied flexibly, taking account of individual site costs, the availability of public subsidy and other scheme requirements. The corresponding policies are set out in Chapter 3 of the draft replacement London Plan. Tower Hamlets Council, in its interim planning guidance has set an overall affordable housing borough target of 50% in its UDP, with a minimum of 35%.

29 Policy 3A.10 of the London Plan is supported by paragraph 3.52, which urges borough councils to take account of economic viability when estimating the appropriate amount of affordable provision. The 'Three Dragons' development control toolkit is recommended for this purpose. The results of a toolkit appraisal might need to be independently verified. This is reinforced under policy 3.13 of the draft replacement London Plan.

30 In relation to estate renewal, where private housing is needed to support replacement of affordable housing provision in estate renewal schemes, the net gain in total provision need not achieve the usual proportion of affordable housing provision, where this is necessary to cross subsidise redevelopment. Whilst this is the case, the applicant is expected to demonstrate that the maximum reasonable amount of affordable housing is being provided by way of an open book appraisal.

31 The applicant is presently suggesting that they would provide 55% of units as affordable housing, which exceeds Tower Hamlets and London Plan requirements. The applicant does however, state that this could fall to 35%, or increase, depending on the availability of grant funding from the HCA. No justification has been given for the level of affordable housing that has been offered, and the application is not supported by detailed information regarding the costs and revenues associated with the scheme. Given the current ambiguity regarding the affordable housing offer and that grant funding may impact upon the mix and tenure split as the phases come forward in the future, the GLA will expect a justification for the level of affordable housing and tenure split, by way of an open book appraisal or viability toolkit if necessary. With this in mind, there will also need to be discussion regarding review mechanisms for the various phases of development, and some comfort as to whether grant funding may come forward or not, before the application is referred back to the Mayor.

### Mix of units

32 London Plan Policy 3A.5 requires new development to offer a range of housing choices in terms of the mix of unit sizes and types, taking into account the housing requirements of different groups. In support of this policy, the Mayor's Housing Supplementary Planning Guidance (SPG) seeks to secure family accommodation within residential schemes, particularly within the social rented sector, and sets strategic guidance for councils in assessing their local needs.

33 The applicant states that the housing mix has been heavily influenced by site design constraints and that it cannot therefore meet the set targets for family housing, providing 11% rather than 30% as set out in the Housing SPG. At 15%, the amount of larger (4 bed plus) social rented units also falls well below the Housing SPG target of 42%.

34 Officers recognise that the offer reflects an increase in the levels of family housing when compared with the previous housing on the site, but it is not clear whether the mix is influenced by consultation with existing tenants, and the need to re-house them, or to meet local needs. Given the suggestion that the figures are guideline, and that the detailed applications would not be referred to the Mayor, it will be important to ensure that any s106 agreement is suitably worded to include benchmark figures so as to ensure that an optimal arrangement is secured. Further discussion of this will be required before the scheme is referred back to the Mayor, noting that in accordance with paragraphs 25 and 29 above, this may also affect the scheme's overall viability and affordable housing offer.

### Residential quality

35 The Government's 'Decent Homes Standards' aims to bring all social housing into a decent condition by 2010. To meet this standard, properties must have reasonably modern facilities, be warm and weatherproof. Currently, nearly 80% of Tower Hamlets Council social housing stock does not meet Decent Homes Standards. Stroudley Walk was transferred to Poplar HARCA with aim of improving the condition of existing units and bringing the estate up to 'Decent Homes Standards'.

36 The scheme includes 142 new residential units, each of which would be provided with their own private outdoor amenity space, in the form of gardens, private balconies. Indicative layouts, showing proposed private amenity spaces have been provided, and it is stated that these would meet the Council's standards for the majority of new units. It is considered that these are sufficiently sized to provide meaningful benefits for residents.

37 The majority of units have been designed as dual aspect units, which provides benefits of cross ventilation and cooling, improved access to daylight and sunlight and this is approach to the layout of the units is welcomed.

38 The unit sizes vary within each of the buildings. In the case of the outline planning application, detailed floor plans have not been provided, but they are indicated in the Phase 1 detailed planning application. The applicant states that each new unit (private and affordable) will achieve an acceptable size when compared with the space standards set out in the Council's SPG, but as advised in the pre-application advice report, it would be appropriate for the applicant to provide a checklist against the Mayor's draft Housing Design Guide and draft replacement London Plan (2009), for the Council to consider when assessing the detailed design, ensuring that adequate private storage space is provided for instance, in addition to layout and individual room sizes (not just overall unit sizes).

### Density

39 Policy 3A.3 of the London Plan aims to maximise the potential of a site taking account of local context, London Plan design principles and public transport capacity. Table 3A.2 of the London Plan provides a framework for assessing density based on habitable rooms and dwellings per hectare. The consultation draft replacement London Plan policy 3.4 and Table 3.2 moves away from 'maximise' to 'optimise' taking into account all those matters in existing policy by with greater emphasis on local context and the design principles set out in Chapter 7 of the draft plan.

40 Paragraph 20.3 of the Housing SPG notes that *"to achieve 100% replacement of demolished social rented units, development at significantly increased density may be necessary to generate sufficient value from market development to support replacement of affordable housing provision or to achieve a mixed and balanced community objective."* The proposed density of the scheme is 495 habitable rooms per hectare. The public transport accessibility level for the area is between 4 and 5, where 1 is low and 6 is high. The density falls within the mid-range for urban areas, as identified in the density matrix of the London Plan.

41 Given the good level of public transport accessibility, the proposed increase of density on this site is acceptable, noting the significantly low density of the existing site (155 habitable rooms per hectare).

## **Urban design**

42 Good design is central to all objectives of the London Plan and is specifically promoted by the policies contained within Chapter 4B which address both general design principles and specific design issues. London Plan Policy 4B.1 sets out a series of overarching design principles for development in London. Other design policies in this chapter and elsewhere in the London Plan include specific design requirements relating to maximising the potential of sites, the quality of new housing provision, tall and large-scale buildings, built heritage, views, and the Blue Ribbon Network. The draft replacement London Plan reinforces these principles, with new development required to have regard to its context, and reinforce or enhance the character, legibility and permeability of the neighbourhood (policy 7.1).

### Tall buildings / views

43 London Plan policies 4B.8 and 4B.9, which relate to the specific design issues associated with tall and large-scale buildings, are of particular relevance to the proposed scheme. These policies set out specific additional design requirements for tall and large-scale buildings, which are defined as buildings that are significantly taller than their surroundings and/or have a significant impact on the skyline and are larger than the threshold sizes set for the referral of planning applications to the Mayor.

44 The proposal site is not within any identified viewing corridors, nor will the proposed building be visible within the Greenwich Park panorama as identified within the London Views Management Framework (LVMF). The design and access statement notes that the building will be located behind an existing structure when viewed from the General Wolfe statue. In views from the streets surrounding the site, the existing tower will replace an existing tall building, and although the new building will be a few storeys higher, its slender form will change the massing and enable it to have a less dominating effect on the street scene.

### Design

45 The general design principles of the scheme are sound. The proposed tower will act as a beacon for the neighbourhood centre and an aim of the design is to regenerate the area through a revised network of public spaces with good surveillance from surrounding buildings. Notwithstanding the proximity of the retail and commercial uses along Bow Road, close to the

northern boundary of the site, the proposed ground floor uses will work with existing uses create a consolidated local centre to better serve the neighbourhood – compared with the Bow Road uses – in terms of access and local integration.

Massing, scale and layout

46 The density of the scheme is relatively low when compared with surrounding estate development, but is appropriate in terms of the design capacity of the site. The scale of the proposed buildings within the majority of the scheme, especially along Stroudley Walk, is appropriate. Nonetheless there are still areas within the scheme where the proposed massing and scale of the buildings will detrimentally impact on the local streetscape. Although the surrounding area’s context is one of mixed-scale buildings, officers are not convinced that the buildings at the southern entrance to the scheme are appropriate the context of the surrounding streetscape, when views along Bruce Road towards the site taken into account. The necessity of these to provide height to act as a ‘gateway’ to the neighbourhood centre is questioned, when the tower would already provide a beacon.



Figure 2: View from north west (Source: Design and Access Statement)



Figure 3: Stroudley Walk east elevation (Source: Design and Access Statement)



Figure 4: Phase 1 Stroudley Walk east elevation (Source: Design and Access Statement)

47 Tower Hamlets Council’s list of statutory listed buildings notes that there is a grade-II listed building on Bruce Road, which is directly adjacent to the proposed development. This is not acknowledged within the design and access statement, and the proposed development would restrict views of the building along Bruce Road. The applicant is requested to provide further justification for the scale of the southern buildings, in the context of surrounding development, local views and the listed building.

48 Although appearance is a reserved matter for the majority of the scheme, enough information has been provided to demonstrate that the contemporary architectural style and layout will assist the site in forming its own character. The proposed buildings will be on a plinth/podium, and there would appear to be sufficient space within the ‘overhang’ of the tower to ensure that there is sufficient light and surveillance of the public realm. The building heights will be appropriate to the width of the street, with clear visibility within most parts of the scheme. The majority of units would be dual-aspect with surveillance across public areas. There would be clear fronts and backs to units, and delineations between public and private space. Routes such as the one leading from Phase 1 to Regent Square are well overlooked and would be suitably lit and landscaped.

#### Appearance and landscaping

49 The proposed building materials are satisfactory. The applicant has responded to officers’ pre-application suggestions. There is still potential to vary materials at reserved matters stage, especially with regard to the ground floor brick treatment, which will have a rather heavy appearance.

50 The layout of the proposed public space is sound, with the west-facing orientation of the central square enabling good levels of light. There is a clear hierarchy of spaces and routes within the masterplan. Officers appreciate the setting of the listed buildings near the proposed tower (including the public house) and support the proposed square, however it is recognised that the physical improvements will need to be in tandem with the regeneration of the building to provide it with an active use, enabling maximum interaction between the square and its surroundings. The Council should consider a condition to restrict the obstruction of retail unit frontages with internal shelving or window vinyl, as such treatment would have a detrimental effect on the interaction between the public realm and the adjoining uses.

51 The street running through the site will be designed to discourage random parking, although the proposed levels of parking will detract from the home zone treatment described by the applicant – the street will instead appear as a traffic-calmed residential street. While the provision of on-street parking is supported for its contribution to street surveillance and lowering

traffic speeds, there is scope for the level of on-street parking to be reduced, to ensure that pedestrian pavement widths are acceptable.

52 On balance, the scheme is acceptable in principle, but further justification of the southern elevation (Bruce Road) buildings in terms of their impact on the street scene and adjacent listed building, and consideration of the external/front treatment of the retail units facing the proposed public square.

### **Children's play space**

53 Policy 3D .13 of the London Plan sets out that "the Mayor will and the boroughs should ensure developments that include housing make provision for play and informal recreation, based on the expected child population generated by the scheme and an assessment of future needs." Using the methodology within the Mayor's supplementary planning guidance 'Providing for Children and Young People's Play and Informal Recreation' it is anticipated that there will be approximately 103 children within the development. The guidance sets a benchmark of 10 sq.m. of useable child playspace to be provided per child, with under-5 child playspace provided on-site. As such the development should make provision for approximately 1,030 sq.m. of playspace.

54 The applicant has undertaken an assessment of child yield, but has not submitted a detailed play strategy or proposed any dedicated children's play space on site. It is stated that 1,940 sq.m. of communal open space would be provided, which would be designed to be child friendly and incorporate playable space. A landscaping plan has been provided but this indicates grass and paving, and there is no breakdown provided as to the quantum of each space and how it would be split between passive, quiet space as opposed to more active playable space. No rationale has been provided as to why no dedicated play space has been provided. Nor is there any indication of nature and quality of nearby facilities, or ease of access to these facilities for older children. In accordance with the SPG, it would be expected that good quality, secure and stimulating play and informal recreation play space be provided, and as advised at pre-application stage. The phasing of delivery should also be investigated, keeping in mind the length of the construction period. Details of the play space would need to be secured by way of condition of any planning permission.

### **Inclusive design and access**

55 London Plan policy 4B.5 and the corresponding draft replacement London Plan policy 7.2 seek to ensure that proposals achieve the highest standards of accessibility and inclusion (not just the minimum), and this and all developments should seek to better minimum access requirements. Policy 3A.5 requires that 10% of new housing is designed to be wheelchair accessible, or easily adaptable for residents who are wheelchair users. Design and access statements should explain the design thinking behind the application and demonstrate how the principles of inclusive design, including the specific access needs of people with disabilities, have been integrated into the proposed development and how inclusion will be maintained and managed.

56 A brief access statement has been submitted with the applications, stating that the scheme has been designed to meet the highest standards of accessibility and inclusion, and that it would conform to Part M of the Building Regulations. The applicant has stated that all units would be designed to meet Lifetime Homes standards and that 10% would be wheelchair accessible.

57 It is noted that as an outline application, no detailed plans or schedule of accommodation has been submitted to show where these units would be or how the Lifetime Homes principles would be met. In relation to the current Phase 1 and subsequent full applications, it would be expected that floor plans be provided to show compliance with Lifetime Homes standards and how wheelchair units would be distributed throughout the development, as advised at pre-application stage. At present the linked application fails to provide these details. It would be expected that such commitments be secured by way of planning condition.

58 In terms of other aspects of the scheme, it is noted that in the Phase 1 development, the lift core is located some distance from the main entrance to these flats. It also appears that the ground floor entrance to the lifts in the sixteen storey block may be constrained in terms of wheelchair accessibility, and the applicant would be expected to indicate turning circles and ensure door widths are suitable. A more robust access strategy would be appropriate, which confirms the rationale for the layout of the scheme, and how the principles of inclusive design have been incorporated at outline and detailed design stage.

59 In terms of the external environment, whilst the applicant states that external areas around the scheme will also be accessible, with suitable gradients, it will be important to ensure that hard landscape treatment around the site are developed with accessibility as a design principle – the landscape strategy does not mention this at present. The community facilities would also be expected to be accessible and a commitment in this respect would be expected. At present, it is not clear on how access to the first floor community facility would be accommodated.

60 The size of the disabled parking bays on the plans is also currently unsatisfactory. These should be sized and situated according to Lifetime Homes principles, involving the shortest possible route between parking space and dwelling. As a home zone, it will be important to ensure that details of shared space are worked up in detailed plans, and show pedestrian routes through a safe zone, which do not conflict with vehicle movement and parking, for instance.

61 As advised at pre-application stage, it was suggested that the applicant undertake consultation with the local access group and disability association to ensure that the specific access needs of local disabled people are taken into account.

62 The applicant should satisfy the Mayor at Stage 2 that it is committed to these principles, and provide indicative floor plans to show how Lifetime Homes and wheelchair housing would be achieved in the detailed applications. At present, in relation to the Phase 1 planning application, there is no assurance that this would be the case. As it currently stands, the proposals do not fully comply with London Plan policies 3A.5 'Housing choice' and 4B.5 'Creating an inclusive environment' or draft replacement London Plan policy 7.2.

## **Climate change mitigation**

63 The climate change policies as set out in chapter 4A of the London Plan and chapter 5 of the draft replacement London Plan collectively require developments to make the fullest contribution to the mitigation and adaptation to climate change and to minimise carbon dioxide emissions (policy 4A.1).

### Baseline carbon dioxide emissions

64 The carbon dioxide emissions of Phase 1 of the proposed development have been estimated using building regulations compliance modelling software i.e. SAP for dwellings. Both regulated and unregulated emissions have been accounted for in line with London Plan requirements. The total emissions for Phase 1 are estimated as 30 Tonnes CO<sub>2</sub> per annum.

65 Although the later phases are only applying for outline planning, similar estimates of the baseline emissions should be made, making use of broad estimates where detailed information is not available.

#### Energy efficiency standards

66 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 requirements set by building regulations. Other features include mechanical ventilation with heat recovery (MVHR), energy efficient lighting and low emissivity glazing. These measures will reduce emissions for Phase 1 to 28% below the baseline emissions. Similar estimates of carbon savings from energy efficiency for Phases 2 and 3 should be provided and related to savings over a Part L compliant building.

#### District heating

67 While the strategy acknowledges that a centralised communal heating system is likely to be required for the larger Phases 2 and 3, individual gas boilers appear to be proposed for Phase 1. The use of individual boilers in each apartment is not a London Plan compliant approach, especially given the high density nature of the development's location which could provide opportunities for area wide decentralised energy networks in the future.

68 Commitment should be made to a communal network approach for Phases 1, 2 and 3 of the development, whereby the communal network meets the entire space heating and domestic hot water demands. The applicant should seek to minimise the number of energy centres/plant rooms supplying the network taking account of the phasing of the development.

69 The applicant should investigate whether there are any existing or planned district heating networks in the vicinity of the development, together with the potential for connecting to such networks. Where networks exist connection should be prioritised. Where no networks are currently available, provision should be made for future connection e.g. allocation of space within plant rooms.

#### Combined Heat and Power

70 The development is relatively small to adopt CHP itself; however, the applicant envisages using CHP to contribute to the heat and power requirements of Phases 2 and 3. Further details in relation to the planned CHP should be provided e.g. CHP capacity, proportion of heat supplied by CHP relative to the top-up boilers, percentage carbon savings, etc.

#### Cooling

71 Glazing incorporating solar control is proposed as a way of avoiding the need for active cooling in the development and the possibility of using internal blinds are mentioned. However, very little information is provided in this regard and further details of the proposed cooling strategy are required.

#### Renewable energy technologies

72 In Phase 1 of the development the applicant is proposing to use solar thermal panels and photovoltaic panels to supply 20% of this phase's energy demand. While the proposed use of PV panels is welcomed, solar thermal panels, if adopted, would need to be integrated with the site communal heating network infrastructure described in the section above. While this has been successfully achieved in schemes elsewhere, examples of such integration of solar thermal in the UK are very rare. If it is not considered possible to integrate solar thermal into the communal

infrastructure, consideration should be given to using the space originally allocated to solar thermal for additional PV. The same considerations will also apply in relation to Phases 2 and 3.

## **Climate change adaptation**

73 The London Plan promotes five principles in policy 4A.9 to promote and support the most effective adaptation to climate change. These are to minimise overheating and contribute to heat island effects; minimise solar gain in summer; contribute to flood risk reduction, including applying sustainable drainage; minimising water use; and protect and enhance green infrastructure. Specific policies cover overheating, living roofs and walls and water. These policies have also been carried over into the draft replacement London Plan.

74 The applicant confirms that the scheme would seek to achieve Code for Sustainable Homes Level 4. The Phase 1 development will incorporate a brown roof as this would be compatible with the use of PV and Solar Thermal panels and would contribute to surface water run-off attenuation in line with Code for Sustainable Homes. The applicant states that green roofs could be viable in the later phases, subject to this not conflicting with PV panel use. Such measures should be investigated further and the details of this secured as part of any planning permission.

75 Lighting systems throughout the dwellings shall incorporate at least 75% energy efficient luminaires internally, and externally all lighting will be 100% energy efficient. The scheme would be fitted with energy efficient sanitary ware that reduces the daily potable water consumption to 105 Litres per person per day. This will meet the requirements of the Code for Sustainable Homes Level 4. There is lack of discussion regarding sustainable urban drainage systems.

## **Comments from Transport for London**

76 The scheme proposes the introduction of a new road in the place of a pedestrian access through the site, with parking spaces incorporated. It is proposed to re-provide eighteen parking spaces within the estate. A further three spaces will be made available for drivers with disabilities. This proposed level of car parking is consistent with London Plan policy 3C.23 'Parking Strategy' and draft replacement London Plan policy 6.13 'Parking', and is therefore supported.

77 Cycle parking is to be provided at a rate of 1 space per residential unit, which is below TfL's minimum standards and those set out in draft replacement London Plan policy 6.13 'Parking'. TfL requires the cycle parking to be provided at a rate of 1 space per 1 and 2 bedroom unit, and 2 spaces per 3+ bedroom unit. The proposed 134 spaces should therefore be increased to a minimum of 177 spaces. TfL is however satisfied that the provision of 8 cycle parking spaces for the community and retail elements of the scheme is consistent with TfL standards. All cycle parking spaces should be secure, covered and easily accessible.

78 TfL is satisfied that the development is unlikely to impede vehicle movements on the TLRN. TfL also considers that the local bus network has sufficient capacity to accommodate the likely number of additional trips anticipated from the development. The proposal to reinstate Stroudley Walk as a vehicular route, which will allow greater flexibility as new bus routing options come forward in the wider Bromley-by-Bow area, is supported.

79 TfL however, requires further information regarding the expected number of trips generated by the development on the DLR. Without this information, TfL cannot fully assess the impact of the development on the capacity of trains and Bow Church DLR station.

80 In order to manage travel demand, TfL welcomes the submission of a Travel Plan, in line with London Plan Policy 3C.2. Further work is, however, required in order to bring the travel plan in line with TfL standards. More specific milestones should be identified (such as the appointment of a travel plan coordinator) and further details should be provided regarding car parking management, and how the targets set reflect existing travel behaviour on the estate.

81 Considering the proximity of the development site to the DLR, TfL requests that appropriate real-time information, such as DAISY, be provided within the development in order to further encourage use of public transport. Whilst TfL requests that further details of such provision be considered within the scheme, the applicant should allow in the s106 a contribution of £20,000 for any implementation.

82 Additionally, TfL is seeking contributions from local developments towards the upgrading of Bromley-by-Bow underground station, and this is being supported by the London Borough of Tower Hamlets. TfL would therefore welcome further discussion with the applicant and Tower Hamlets council regarding a financial contribution towards the planned station improvements.

83 TfL also requests a contribution towards a highway scheme (partly funded by TfL, Section 106 contributions from local developments and the Olympic Park Transport Environmental Management Scheme) to improve pedestrian facilities at the junction of the A11 Bow Road with Bromley High Street. The improvements include re-aligning and strengthening the existing pedestrian crossing facilities, making crossings easier and safer. Considering the site's proximity to the A11 and Bromley High Street, and the increased pedestrian trips likely to be generated by the proposed development, TfL requests a contribution of £50,000 towards the cost of this project.

84 A construction logistics plan (CLP) should be submitted, which should seek to minimise highway and traffic impact to the highway network during the course of construction. Similarly, TfL also requests the submission of a delivery and servicing plan (DSP) which should seek to rationalise servicing with the aim to reduce the total number of trips made and to avoid critical times on the road network. Both the CLP and DSP should be secured through a Section 106 obligation.

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

85 The views of Tower Hamlets Council are not known at this stage.

### **Legal considerations**

86 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. 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**

87 There are no financial considerations at this stage.

### **Conclusion**

88 London Plan policies on estate renewal, housing, density, urban design, tall buildings, access, child play space, climate change and transport are relevant to this application. The application complies with some of these policies but not with others, for the following reasons:

- **Principle of development:** The principle of estate renewal with an increase housing provision, together with ground floor active uses and community facilities is supported by London Plan policy.
- **Housing:** The creation of additional dwellings to cross-subsidise improved affordable housing is acceptable in principle, together with the introduction of intermediate housing. The applicant has, however, failed to demonstrate that the proposal provides the maximum reasonable amount of affordable housing, or that an appropriate housing mix and tenure will be achieved in the built out scheme, contrary to policies within the London Plan.
- **Standard of residential accommodation:** The applicant has committed to providing a satisfactory residential environment for its occupiers in terms of size and layout of the units, but further details of this would be required and would need to be secured by way of condition in order to comply with the London Plan.
- **Density:** The proposed residential density is within the guidance range contained in table 3A.2. As such the proposal complies with policies 3A.3 and 4B.1 of the London Plan.
- **Urban design:** The proposal is broadly consistent with the design principles of the London Plan, subject to further clarification. The principle of a tall building in this location is acceptable.
- **Child play space:** The proposal fails to provide any dedicated play space or play strategy, contrary to policy 3D.13 of the London Plan.
- **Inclusive access:** The applicant has committed to meeting Lifetime Homes standards, together with provision of 10% wheelchair accessible units in accordance with London Plan policies, but further clarification is required in relation to this and the landscaping strategy in order to be satisfied that these commitments can be achieved in the detailed design stages.
- **Climate change mitigation and adaptation:** The applicant has broadly followed the energy hierarchy in Policy 4A.1. Sufficient information has been provided to understand the proposals as a whole and to verify carbon dioxide savings in principle, but the scheme currently fails to demonstrate compliance with the Mayor's energy hierarchy in relation to baseline emissions, CHP, district heating, cooling and renewable energy in particular.
- **Transport:** The scheme is broadly acceptable from a transport and parking perspective but further clarification is required in order to comply with London Plan and draft replacement London Plan policies.

89 Whilst the application is broadly acceptable in strategic planning terms, on balance the application does not comply with the London Plan.

90 The following changes might, however, remedy the above-mentioned deficiencies, and could possibly lead to the application becoming compliant with the London Plan:

- **Housing/affordable housing:** Further clarification and details regarding the affordable housing offer, the mix of units and tenure, and social housing funding are required. Details relating to the financial viability of the scheme should be submitted before the application

is referred back to the Mayor. The applicant should enter into discussion with Tower Hamlets Council and the GLA to establish the whether mechanisms should be provided through the S106 agreement to provide phased viability testing. A minimum number of family sized affordable units should be secured by condition or S106 agreement.

- **Standard of residential accommodation:** The applicant should provide details of how the scheme would meet the highest standards of housing design.
- **Urban design:** Further justification for the scale of the southern buildings (facing Bruce Road), in the context of surrounding development, local views and the listed building.
- **Children's play space:** A play strategy is required, which should be secured by condition to ensure compliance with London Plan policy 3D.13.
- **Access:** Further information in relation to Lifetime Homes, wheelchair accessible housing, and the design of the home zone is required, and should be secured by way of condition.
- **Climate change mitigation and adaptation:** Further information in relation to energy and sustainable design are required as detailed in the above report. The measures proposed would need to be secured by way of condition or s106 planning obligation.
- **Transport:** The transport and parking matters set out in this report should be clarified and secured way of S106 legal agreement.

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