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GREATER LONDON AUTHORITY
Development, Enterprise and Environment

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Development Management
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Camden Town Hall Extension
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London
WCTH 8EQ

Our ref: D&P/3032b/01

Your ref: 2013/3807

Date: 3 September 2013



Dear Richard,

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

Land to the west of Royal Mail sorting office bounded by Phoenix Place, Mount Pleasant

LPA reference: 2013/3807

I refer to the copy of the above planning application, which was received valid on 10 July 2013. On 3 September 2013 the Mayor considered a report on this proposal, reference D&P/3032b/01. A copy of the report is attached, in full. This letter comprises the statement that the Mayor is required to provide under Article 4(2) of the Order.

The Mayor considers that whilst the application is broadly acceptable it does not fully comply with the London Plan, with the reasons and the possible remedies to address these deficiencies set out in paragraph 83 of the report.

The application represents EIA development for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011. The environmental information made available to date has been taken into consideration in formulating these comments.

If your Council subsequently resolves to make a draft decision on the application, it must consult the Mayor again under Article 5 of the Order and allow him fourteen days to decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 to refuse the application, or issue a direction under Article 7 that he is to act as the local planning authority for the purpose of determining the application and any connected application. You should therefore send me a copy of any representations made in respect of the application, and a copy of any officer's report, together with a statement of the decision your authority proposes to make, and (if it proposed to grant permission) a statement of any conditions the authority proposes to impose and a draft of any planning obligation it proposes to enter into and details of any proposed planning contribution.

Please note that the Transport for London case officer for this application is Patricia Charleton , email PatriciaCharleton@tfl.gov.uk , telephone 0203 054 7028.

Yours sincerely,



3 September 2013

Mount Pleasant, Farringdon

in the London Boroughs of Islington and Camden

planning applications no. 2013/3807/P & P2013/1423/FUL

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

Comprehensive redevelopment in buildings up to 12 storeys comprising 681 residential units, 4,260 sq.m. of office space, 2,250 sq.m. retail and community space, with parking, landscaping and public realm works.

The applicant

The applicant is **Royal Mail Group** and the architects are **AHMM, Fielden Clegg Bradley, Allies and Morrison, and Wilkinson Eyre Architects.**

Strategic issues

The principle of a **residential led** mixed use development in the **Central Activities Area** is in accordance with strategic objectives for this highly accessible location, and would benefit London's World City status.

The **masterplanning** principles, architecture, form and scale of development are well considered and of a high quality in principle and would not harm local or strategic views.

The residential quality of the scheme is high, with an appropriate housing mix and play space.

The **affordable housing** is still the subject of discussion and negotiation to ensure the maximum reasonable amount would be delivered.

Other strategic issues such **access, sustainability, residential quality** and **transport** are generally acceptable, subject to clarification and further information being provided as detailed in the report below.

Recommendation

That Islington and Camden Council be advised that the schemes are broadly acceptable in strategic policy terms however, the matters set out in paragraph 83 require further consideration and discussion before it can be confirmed that the applications fully comply with the London Plan.

Context

1 On 10 July 2013 the Mayor of London received documents from Islington Council and Camden Council notifying him of two planning applications 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 had until 21 August 2013 to provide the Councils with a statement setting out whether he considers that the applications comply with the London Plan, and his reasons for taking that view. The Stage 1 timeframe has been extended to enable the Mayor to consider the applications. 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 applications are referable under the following Categories 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;

1B Development which comprises or includes the erection of a building in Central London (other than the City of London) and with a total floorspace of more than 20,000 square metres;

1C Development which comprises the erection of a building that is more than 30 metres high and is outside the City of London.

3 Once Islington and Camden Councils have resolved to determine the applications, they are required to refer them back to the Mayor for his decision as to whether to direct refusal; take them over for his own determination; or allow the Councils to determine the applications themselves.

4 The environmental information for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 has been taken into account in the consideration of this case.

5 The Mayor of London's statement on this case will be made available on the GLA website www.london.gov.uk.

Site description

6 The scheme relates to a 3.5 ha site within the boroughs of Islington and Camden, bounded by Rosebery Avenue/Mt Pleasant to the south, Gough St to the west, Calthorpe St to the north and Farringdon Rd to the east. For the purposes of the planning application, the site has been divided into two, with Phoenix Place running between them. The Calthorpe Street site to the east is within Islington, and the Phoenix Place site to the west, is within Camden.

7 The Calthorpe Street site presently contains a surface car park and servicing yard for RMG operations. The Royal Mail Sorting Office is located to the southern end of the site, but is outside the application boundary. The Phoenix Place site is used as a car park for Royal Mail staff employed at the sorting office, with a small collection of low scale industrial buildings also present. Its northern extent is bounded by the rear wall of an existing building that is the intended new home for the British Postal Museum and Archive (BPMA). There is an underground Mail Rail depot located on the site that ceased operation in May 2003 but with tunnels and infrastructure still remaining.

8 Part of the site sits within the Rosebery Avenue Conservation Area, and is adjacent to four other conservation areas. The site is within the Central Activities Zone and is also within a LVMF strategic view (London Panorama from Kenwood and Parliament Hill).

9 Nine bus routes operate within reasonable walking distance of the site; 17, 19, 38, 45, 46, 55, 63, 243 and 341. Specifically, route 63 stops adjacent to the site frontage on Farringdon Road. The nearest station is Farringdon, approximately 600 metres to the south east, providing access to underground services on the Metropolitan, Hammersmith & City and Circle lines respectively and Thameslink rail services. It will also benefit from Crossrail services from 2018.

10 There are five cycle hire docking stations within a reasonable walking distance of the site. The nearest of those is located in Margery Street, approximately 50 metres to the north of the site.

11 As such, it is estimated that the southern and western parts of the site achieve an excellent Public Transport Accessibility Level (PTAL) of 6b, whereas the northern part of the site, adjacent to the Calthorpe Street achieves a PTAL of 5 (on a scale of 1 to 6 where 1 represents the lowest level and 6, the highest).

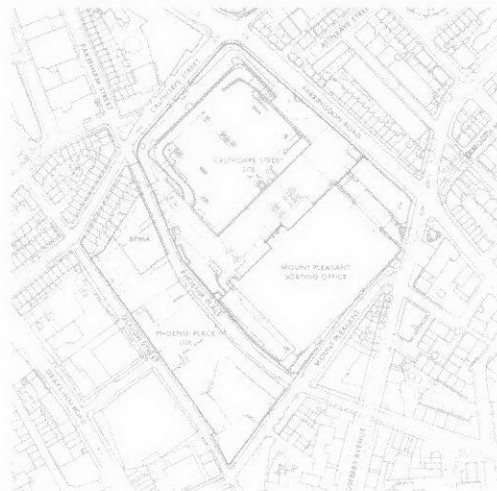


Fig 1: Site plan

Details of the proposal

12 Two separate detailed planning applications have been submitted for the scheme. Conservation area consent is also being sought. The scheme proposes comprehensive redevelopment and construction of a series of 10 buildings ranging in height from three to fifteen storeys to contain residential, office, retail and community floor space.

13 In total, 336 residential units are proposed on the Calthorpe Street site, with 345 on the Phoenix Place site.

14 There are some non-residential uses proposed across the site, with most located on Farringdon Road and through the central public square. In total, 4,260 sq.m. (GIA) of office space is proposed, with 2,250 sq.m. (GIA) of retail and community uses.

15 Residential parking is proposed, totalling 110 spaces, together with re-provision of 350 space provided for RMG operational parking.

16 The masterplan also includes provision of public realm, open space, alterations to the public highway and excavation and enabling works including a new acoustic roof to enclose the service yard of the sorting office, a new ramp structure and the creation of new basement levels.

Case history

17 Pre-application discussions took place with GLA in the lead up to the application submission, where the mixed use redevelopment of this site for residential and commercial uses was strongly supported, together with the masterplanning principles, layouts, heights and architecture. At the time, the affordable housing offer was still being considered by the applicant, and further discussion was therefore expected regarding this and other detailed aspects, including transport and energy as the scheme progressed.

Strategic planning issues and relevant policies and guidance

18 The relevant issues and corresponding policies are as follows:

- Land use principles *London Plan*
- Housing – affordable housing *London Plan; Housing SPG; Housing Strategy; draft Revised Housing Strategy; Shaping Neighbourhoods: Play and Informal Recreation SPG;*
- Density *London Plan; Housing SPG*
- Urban design *London Plan; London View Management Framework SPG; draft Shaping Neighbourhoods: Character and Context SPG*
- Strategic views *London Plan, Revised View Management Framework SPG*
- Inclusive design *London Plan; Accessible London: achieving an inclusive environment SPG; Planning and Access for Disabled People: a good practice guide (ODPM)*
- Sustainable development *London Plan; Sustainable Design and Construction SPG; draft Sustainable Design and Construction SPG (2013); Mayor's Climate Change Adaptation Strategy; Mayor's Climate Change Mitigation and Energy Strategy; Mayor's Water Strategy*
- Transport and parking *London Plan; the Mayor's Transport Strategy; Land for Industry and Transport SPG*
- Crossrail/CIL *London Plan; Mayoral Community Infrastructure Levy; Crossrail SPG*

19 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 2011 London Plan, Islington Core Strategy (2011), the 2002 Islington Unitary Development Plan (saved and retained policies), Islington Development Management DPD, Site Allocations DPD, Finsbury Local Plan DPD (all 2013);

Camden Council Core Strategy (2010), Camden Council Development Policies (2010), and 2010 Proposals Map.

20 The following are also relevant material considerations:

- The National Planning Policy Framework and Technical Guide to the National Planning Policy Framework.
- The Mayor's 'intend to publish' Revised Early Minor Alteration to the London Plan.
- Camden Council's Site Allocations Development Plan Document (submission stage).
- Mount Pleasant SPD prepared by both boroughs.

Principle of development

21 The site is located within the CAZ and the Mount Pleasant SPG sets out the objectives for the site, which includes: creating a new neighbourhood that includes housing (and affordable housing), provides for a range of different types and sizes of businesses, creates high quality public spaces and routes, and achieves a high quality design that enhances the historic significance of the site and surrounding area.

22 The scheme proposes a significant amount of housing, affordable housing and commercial floor space. The site is not protected at a strategic level for commercial uses, and it is recognised that in the current economic environment it is often a mix of use that make developments viable. A residential-led mixed use scheme is a means of bringing forward commercial development of this site, which may otherwise be unviable and the scheme would deliver approximately 300 new jobs on the site, as well as facilitating the continued operation of the sorting office. As such, the principle of a residential mixed use scheme is welcomed and supported.

Housing and affordable housing

23 Islington's annual monitoring target is 1,170 units additional homes per year between 2011 and 2021; Camden's target is 665. The proposal represents 28% of Islington's annual provision and 52% of Camden Council's. The delivery of housing on these key development sites within the boroughs is strongly supported.

Affordable housing

24 The scheme has been developed on the basis of providing approximately 20% affordable housing. In total, the applicant is proposing 132 affordable units, made up of 77 social rented and 55 shared ownership units.

25 In order to accord with local affordable housing policies and London Plan requirements, the applicant has submitted a viability assessment to support its assertions that the maximum reasonable amount of affordable housing is being offered. It is acknowledged that discussions regarding the affordable housing offer are on-going and that at the time of writing, whilst an initial independent report had been prepared on behalf of the boroughs, this has not yet been shared with GLA officers. It is understood that the Council is intending to undertake further analysis of the toolkit due to concerns over the methodological approach the applicant has adopted for the value of the site (using the RICS Guidance Note definition of Site Value), whereas Islington Council's preference is that an alternative approach is adopted (using Existing Use Value plus premium). On this point, the Housing SPG notes under paragraph 4.2.23 that *"there are a range of valuation methodologies that can be used to assess viability in particular cases, and the usefulness and robustness of a particular approach in providing a basis for informed decision making is the key criterion for deciding which to use in each case"*.

26 With this being the case, the key issue for the GLA is that the provision of affordable housing is being maximised and that a logical, transparent and accurate assessment of inputs and outputs for the development has been made. At this time, in the absence of a resolution regarding this point, or it having been satisfactorily demonstrated that the affordable housing provision is being maximised, it is not possible to confirm that the scheme accords with the London Plan. It is therefore requested that the findings of the independent surveyor(s) be shared with GLA officers at the earliest convenience, and if there remains any points of contention within the appraisal, that further dialogue take place between the GLA, applicant and the boroughs in order to reach a satisfactory conclusion. The independent review will be expected analyse in detail the costs and values that have been inputted to the toolkit and verify the assumptions that have been made in relation to rent levels and sales values, for example.

27 In terms of tenure, the assumptions are that the affordable housing comprises social rent and intermediate rent. In line with the NPPF, the revised early minor alterations to the London Plan introduces 'affordable rent' as an additional affordable housing product along with social rent and intermediate housing. The Mayor's Housing SPG notes that at least for the duration of the 2011-15 investment round, the Government anticipates that funding of social rent provision will only be supported in limited circumstances. Therefore housing providers, supported by the relevant local authorities, will have to make a strong case to demonstrate why affordable rent would not be a viable alternative to social rented units within schemes. This does not preclude support for provision of social rent through applicants or Boroughs own resources/funds but before doing so the applicant will need to consider whether the scheme will indeed be securing the best outcome affordable housing in terms of numbers and range of units in line with the requirement to maximise output as required by London Plan policy 3.11, 3.12 and paragraphs 4.3.2 – 4.3.28 of the Mayor's Housing SPG.

28 The tenure split between affordable and shared ownership is 58:42, which is close to the expectations set out in the London Plan and is acceptable.

29 As noted in the London Plan, there are also circumstances where boroughs should consider whether it is appropriate to put in place provisions for re-appraising the viability of schemes, and maximise affordable housing provision, taking into account the possibility of increased sales values in the future. Such an approach may be appropriate for this scheme, given its size, the ability to phase the scheme and length of time that may pass from initial toolkit appraisal to actual build out.

Housing choice

30 The scheme proposes a range of studio (1%), one (26%), two (53%), three (16%) and four (4%) bed units. The largest proportion of units are two and three bed units, and 43% of the affordable units are three-bed plus, which is supported, in accordance with the Mayor's Housing Strategy. The proposals also meet the Councils expectations that a high proportion of social rented units are large family units. Confirmation should be provided from the respective housing teams that the determined mix reflects local needs and borough housing requirements.

Density

31 The site has a public transport accessibility level (PTAL) of between 5 and 6b (ranging across the site), and is classified as central in character whereby a density range of between 650-1,100 habitable rooms per hectare is suggested in the London Plan. The density of the site ranges from 467 to 822 habitable rooms per hectare (hrha), with an average of approximately 600 hrha. This falls below the density range in the London Plan however, in the context of the surrounding urban grain and constraints imposed by strategic views, the density levels are acceptable in this instance.

Residential quality

32 The applicant has provided detailed floor plans for the residential elements of the scheme and confirms that all units would meet and exceed the space standards set out in table 3.3 of the London Plan, which is welcomed. In terms of other standards as set out in the Housing SPG, the blocks feature fewer than eight units per core, so too, which is welcomed in terms of encouraging a sense of ownership and community in the development. The applicant has sought to maximise dual aspect units, with triple aspect units in some instances. There are no single aspect north facing units proposed. All units benefit from private amenity space in the form of a balcony, wintergarden, or terraces. Confirmation that these exceed the minimum dimensions within the Housing SPG should be provided.

Children's play space

33 Using the methodology within the Mayor's play space SPG, it is anticipated that there will be approximately 212 children residing within the residential element of the development, with approximately 81 under 5 year olds. 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.

34 The proposed development incorporates approximately 7,900 sq.m. of accessible open space, provided through roof gardens, courtyard spaces, gardens or squares. Of this, dedicated provision totalling 1,660 sq.m. is proposed for younger children under 5 year olds, with 1,910 sq.m. for 5-11 year olds and 550 sq.m. for over 12's. The play strategy proposes specified age-related playable spaces, incidental spaces, and multifunctional areas for all ages, and the scheme exceeds the requirements of the Mayor's SPG, which is welcomed. Details of these areas should be secured by way of condition.

Tall buildings, strategic views, and urban design

Strategic views

35 Part of the site lies in the protected vista of the designated panorama from Parliament Hill to St Paul's Cathedral (LVMF 2A.1) and from Kenwood House to St Paul's Cathedral of (LVMF 3A.1). The height and form of the buildings have been influenced by the viewing plane. The application documentation includes accurate visualisations from all relevant points set out in the LVMF SPG (March 2012), together with assessments of the potential impact on the viewer's ability to recognise and appreciate the strategically important landmark(s).

36 In the view from Kenwood House (LVMF 3A.1) the development would neither breach the threshold planes of the Landmark Viewing Corridor or the Wider Setting Consultation Area of the Protected Vista and its impact on the strategic view would be slight. In the view from Parliament Hill (LVMF 2A.1) there would be a small, 4 metre intrusion into the Wider Setting Consultation Area to the west of the viewing corridor, but this would be seen against the existing backdrop of the city's roofscape, including the profile of Guys Tower and would not harm the vista or the ability of the viewer to recognise and appreciate St Paul's Cathedral in the view.

Scale, height and layout

37 The masterplan is well integrated with the City, with routes, streets and spaces working well with the surrounding urban grain. The block layout of the scheme provides enclosure over the publicly accessible courtyards and good definition of surrounding streets and spaces, which is welcomed. The creation of new public open space at the Gardens is particularly welcome in an

area in which open space is at a premium. This space will be well overlooked by the proposed residential units and follows a rich local tradition of residential square typologies. The Gardens would integrate well with the local space network, including Wilmington Square Gardens located to its east.

38 Other interventions around the periphery of the site include widening footways and additional street planting to make the most of spaces such as the entrance to the Christopher Hatton Primary School on Mount Pleasant. The creation of new public spaces and routes through what is currently a relatively impenetrable site is welcomed.

39 The height of the buildings vary from 4 storeys up to 12 storeys along Phoenix Place and 15 storeys in the south west corner of the site, along Mt Pleasant. Whilst it is noted that the heights exceed the guidance in the SPG, and that there were initial concerns about the scale of the development, the further work undertaken demonstrates that the development would fit into the cityscape. The locations selected for the taller elements enable the mass to be achieved without disrupting views or the fine grain of the area. The new public space created at the centre of the site is enclosed by buildings of a range of heights from 4 to 9 storeys, with 7 being the predominant shoulder height and this should provide a well-proportioned sense of enclosure to the space. Along Farringdon Road the tallest building blocks are at 8/7 storeys and 6 storeys - a similar scale to existing commercial buildings that front the street including the existing Post Office building. Overall, the scheme is considered to achieve a good fit within its context and the variety of heights and building types gives it a very "London" character.

40 As requested a pre application stage and in accordance with London Plan tall buildings policies, a greater amount of detail has been provided regarding the appearance of the taller elements of the scheme in order to demonstrate that the development will be of an outstanding architectural quality. Local and strategic views have also been provided, with accurate visualisations to demonstrate how the scheme fills the gap created by the existing condition. The predominant material finish is brick reflecting the extant Georgian and Victorian vernacular in the area.

41 In views along Calthorpe Street, the use of brick for the external elevations and the stepping down of the buildings scale to 4 storeys ensures the development has a good fit with the setting of the conservation area. In views from St Andrews Gardens, the development would appear behind an existing two story terrace of listed buildings, but would be seen in the context of a 6 story inter-war residential building that flanks one side of the park and substantial and mature tree planting and in this context is not considered to harm the setting of the buildings. In views along Wren Street from its junction with Calthorpe Street, a combination of site topography and perspective enables the taller 10 to 15 storey buildings to be accommodated in the townscape without having an overbearing impact on the four storey listed Georgian Terraces on the south side of Calthorpe Street. There would be some slight harm to the setting of listed buildings in the view along Guildford Street as the skyline of the existing terraces currently has no modern development visible in their backdrop. Overall the applicant has demonstrated that the scheme would have a good fit with its setting and whilst there are some views that would compromise heritage assets to a degree, these have been kept to a minimum.

42 At pre-application stage, there were initial concerns raised about the C1 wedge (west) block on the corner of Phoenix Place and Calthorpe Place. The study model of the internal courtyard demonstrates that the walkway system will produce an acceptable residential quality. This element of the scheme is supported.

43 Through the design evolution, the architects have presented design changes to site P1, where the block has been broken down to reduce overshadowing and provide views into and out

of the central courtyard, with the massing re-distributed. When considering earlier iterations, it was considered that the notion of a perimeter and mansion block concept had not been fully resolved but this is now achieved. The work undertaken at street level and in terms of articulating the massing is welcomed. Further work has also been undertaken to the building lines of the commercial units on Mt Pleasant. The extent of the staggered saw-tooth shop fronts has been reduced, and the streetscene views are less harsh than previously and present a calmer rhythm that should work well with the delicate setting of the listed Queen Anne terrace opposite.

44 Overall, the scheme works well in terms of dealing with the change of levels along Gough Street, and the level change can be accommodated without having large blank frontages on the street elevations.

45 In summary, the masterplanning principles are well-considered, with clearly defined public and private spaces that are carefully integrated in the surrounding streets. The two individual schemes are acceptable on their merits, and together achieve a high quality of placemaking. The applicant's commitment to ensuring a high standard of design quality is welcomed and maintaining the various architects as the project architects on the scheme post planning should be assured.

Inclusive design

46 The application is accompanied by an access statement for each of the development sites, which cover the principles of inclusive design, access across the site and into buildings, external spaces and landscaping, pedestrian routes, vertical circulation and drop off points. The provision of new spaces and routes across this vast site is positive in urban design and public realm terms, and providing new quieter routes for local residents.

47 There are some level changes across the site, and underground infrastructure limits the depth of basement parking, which results in some areas of public and private landscaped areas and entrances being more difficult to design as step-free. The applicant has explained efforts made to achieve level and step-free routes where possible, ensuring that the landscaping design attempts to make all areas as accessible as possible. The borough access officers would be expected to review these aspects in detail. It is noted that there are sections of public and private landscaped space where stepped routes are unavoidable; however alternative routes via ramp are also available, with gradients generally of 1:28 or greater available nearby. Further discussion with the borough access officers and the applicant over the steeper ramps and design of the public realm would be appropriate as the scheme progresses. Given the range of uses and level of activity, a careful strategy will be required at detailed design stage, particularly in relation to street furniture and outdoor spaces to ensure that pedestrian mobility is not impaired. Landings, seating and resting points should be secured at build out stage.

48 The applicant has set out how each of the 16 points for Lifetime Homes will be met and has confirmed that 10% of units would be provided as wheelchair accessible adaptable. Typical flat layouts are shown, and details of how relevant standards would be met have been provided. Details should be provided confirming the location of these units, and that they cover both private and affordable housing and are not clustered together. Noting that two lifts are provided for some blocks, whilst others feature one lift, and that there are some ground floor units with stair entrances to the communal open space, further discussion would be welcomed to confirm that the units provided as wheelchair accessible or adaptable are appropriately located. Ideally some of these units would be fitted out as accessible from the outset. These commitments should be secured by way of condition.

49 In terms of parking, the scheme includes 34 Blue Badge Bays to be provided in the basement, located in reasonable proximity to vertical circulation cores. At 5% provision, the disabled parking levels are below the expected one space per wheelchair accessible unit. As such, the submitted car parking management should include clauses relating to regular monitoring and review so as to ensure that there are sufficient blue badge spaces kept available for the accessible units. The management of taxi drop-off and community transport points should also be subject to this management plan.

Sustainable development and climate change

Climate change adaptation

50 The applicant has submitted an energy strategy for each of the site, and is proposing to reduce carbon dioxide savings by 42% for the Calthorpe Road site and 40% for the Phoenix Place site. Whilst broadly following the energy hierarchy, with a range of passive design features and demand reduction measures proposed, and district heating, CHP and renewable energy sources, there remain outstanding issues that require resolution before it can be confirmed that the scheme is in accordance with the London Plan.

51 In accordance with the GLA guidance on planning energy assessments, the regulated carbon dioxide emissions for the whole development, expressed in tonnes per annum, after each stage of the hierarchy is required. The reduction in carbon dioxide emissions from each stage of the energy hierarchy should also be provided.

52 The applicant is also requested to investigate the potential for both parts of the development to be fed a single energy centre. Specifically, the applicant should quantify the increase in floor area which would be required for the Phoenix Place energy centre to be the single energy centre for the development. This information should also be provided for the Calthorpe Street energy centre. In calculating the additional floor area, consideration should be given to the space saving effect of using one CHP of equivalent capacity to the two currently proposed. Details regarding the overall reduction in carbon dioxide emissions, expressed in tonnes per annum, from CHP is also required in this respect.

53 In relation to renewable energy technologies, the applicant is proposing to install open loop ground source systems providing active cooling and an element of the heat demand not supplied by CHP. The applicant should clarify how the low temperature heat available from the ground source system will be integrated with the usually higher temperature site heat network infrastructure. Again, the applicant should provide the overall reduction in carbon dioxide emissions, expressed in tonnes per annum, from the third element of the energy hierarchy.

Climate change adaptation - sustainability

54 The applicant has set out its commitment to achieving Code Level 4 and BREEAM 'very good' and has provided a sustainability statement that outlines the key measures proposed to meet and exceeds the Mayor's essential and preferred standards in relation to energy efficiency, water efficiency and use of rainwater recycling. Greywater recycling, water metering and water efficient devices would be used – and for the Calthorpe Road scheme, the applicant intends to reduce consumption to 90/l/p/day. The applicant should seek to achieve this across both schemes, and if this cannot be achieved, provide a justification for this.

55 Green and brown roofs will be used across the site to contribute towards biodiversity enhancement and urban greening in the CAZ in accordance with the London Plan, and will also assist in surface water attenuation. Surface water run-off would be attenuated by tanks to

achieve 50% attenuation, although the applicant should also investigate products which specifically are designed to store rainwater as an integral element of tree planter pits and make use of run-off water in landscaping features. The applicant's commitments would be expected to be secured by way of condition.

Transport

Car Parking and Access

- 56 The scheme would see the main vehicular access to the existing Royal Mail site relocated 15 metres south on Farringdon Road with the retention of vehicular egress onto Roseberry Avenue to facilitate the Calthorpe Road scheme. In response to TFL's initial concern about the layout and the potential impact on pedestrian safety, the applicant is producing revised detailed drawings. The preferred layout would incorporate a raised surface at crossing points on Farringdon Road to reduce vehicle speeds and give greater pedestrian priority.
- 57 As currently set out, the proposed access arrangements would also require amendments to the traffic management order (TMO) to allow the existing bus cage on Farringdon Road would be shortened to 29 metres, the extension of the northbound bus lane, footway reinstatement and the relocation of the taxi rank further south. These works should be secured through a S278 agreement with TFL.
- 58 Vehicular access to the existing Royal Mail staff car park would be relocated and be served by the proposed underground car park, with access from Gough Street. The Calthorpe Street element of the scheme would be served by a priority junction on Calthorpe Street itself including an entry only for service vehicles and an exit onto Farringdon Road. The Phoenix Place element would be served by vehicle accesses from Gough Street and from Phoenix Place. The proposed residential accesses have been subject to a stage 1 safety audit and are therefore considered satisfactory.
- 59 The Calthorpe Street element of the scheme would contain 65 parking spaces (including 17 blue badge spaces); a ratio of 0.19 spaces per dwelling. The Phoenix Place element proposes 54 parking spaces (including 17 blue badge spaces); a ratio of 0.15 spaces per dwelling. Given the highly accessible location and an already congested highway network, the restraint based approach to parking provision is welcomed. As noted above, the allocation of parking spaces should nevertheless be secured in line with the draft car parking management plan to ensure that priority is given to occupants of wheelchair and/or family dwellings. The applicant's draft section 106 heads of terms refer to a 'permit free' obligation, which is welcomed and the provision of electric vehicle charging points in accordance with London Plan standards should be secured by condition. The boroughs should also secure on street car club spaces as well as resident car club membership through the travel plan.
- 60 A total of 196 parking spaces are proposed for the retained Royal Mail use (a decrease of 24 spaces from the current level). To justify this level, the applicant advises that with intensification of their operations, staff numbers are expected to increase from 1,890 to 2,970, representing a 57% expansion overall and an 83% increase in staff on the early shift (06.00 - 14.00 hours). As recommended, the applicant has undertaken a parking accumulation study of its facilities which reveals that currently, the maximum occupation of 156 vehicles occurs between 09.00 and 11.00. Parking permits are issued to staff on a needs basis with priority given to those who work the early and night shifts. Based on the expected increase in staff levels and associated trip patterns, the proposed quantum of parking is considered to be reasonable and unlikely to lead to significant peak hour trips. The applicant should nevertheless

adopt a staff management plan to show how parking will be controlled, and allocated. Electric vehicle charging points (ECVPs) should also be provided for employee parking.

61 A total of 817 residential cycle spaces, 27 visitor spaces and 51 commercial spaces are proposed in line with the revised early minor alterations to the London Plan, details of which should be secured by way of condition. Cycle parking for Royal Mail staff will increase from 50 to 100 spaces, which is welcomed. All employee cycle parking should also include changing and showering facilities.

Trip generation and mode split

62 The applicant has assessed the entire masterplan development, with the Royal Mail enabling development, and has also separately assessed the Phoenix Place site and the Calthorpe Street sites (with enabling development). In addition, the applicant has considered their proposals cumulatively with other nearby development. Future baseline traffic flows have been derived using traffic data from the existing Royal Mail operation along with the expected changes to operational and staff traffic flows. This approach is accepted.

63 The trip rate assessment has been undertaken using TRAVL survey data from private riverside developments in London, which are relatively low and relevant to the proposed development. This is acceptable. For the commercial trip assessment, survey data from retail uses has been used as it records the highest all mode trip generation and is therefore considered robust. The use of Census 2011 data to estimate the mode split is acceptable, along with the transfer of car trips to other modes as limited parking will be provided with the proposed development.

Highway Impact

64 Modelling has been undertaken to assess impact on the highway network. TfL is currently reviewing the outcome and welcomes further discussion with the applicant as to the extent of any mitigation required. Initial results nevertheless indicate that the junction of Rosebery Avenue/Farringdon Road will operate over capacity in the future, with and without this development. It is acknowledged that the intensification of Royal Mail operations, for which no permission is required, has a significant impact on traffic conditions in this area.

65 The proposed loading bay on Phoenix Place will be designed in accordance with TfL's kerbside loading guidance 2009, which is welcomed.

Walking and Cycling

66 The creation of new cycle and pedestrian routes through the development are welcomed as they will improve permeability and increase walking as well as discourage vehicles. The applicant should also promote walking through improved wayfinding and as such both boroughs are encouraged to secure a contribution towards the implementation of TfL's Legible London signage.

67 A pedestrian audit (PERS assessment) has been submitted and concludes that whilst the local pedestrian environment is generally well designed there is some scope for improvement, particularly along Phoenix Place. The design of the development, including the provision of new footways and crossing is expected to address this matter. Given the high volume of walking and cycling trips overall, further discussion with the applicant and Camden/Islington Council is encouraged in order to establish as to how these proposals can contribute to improvements to the design of the junction at Farringdon Road/Rosebery Avenue in particular.

68 The transport assessment does not provide details of predicted cycle trips along Farringdon Road, or vehicle numbers using the egress ramp. Nevertheless, it is noted that overall the development will generate a high level of cycle trips; 58 two way trips in the am peak and 55 trips in the pm peak. It is noted that TfL is currently examining options for improving cycle routes through this area as part of the Mayor's Vision for Cycling in London (March 2013). A large volume of cycle trips are expected in Farringdon in the future, especially in the peak hours where more 1000 trips are predicted. It is therefore expected that quiet routes such as Phoenix Place could become significantly busier. That being the case, the introduction of active frontages along this route would be welcomed as it is currently somewhat isolated. The retention of access for Royal Mail operations on Farringdon Road will also minimise the potential for cyclist/vehicular conflicts elsewhere in this area.

69 An audit of the seven bus stops that encircle the site has been undertaken. It reveals amongst other things, an absence of real time information and suitable kerb heights. A capped contribution of up to £20,000 per stop is therefore requested to upgrade them to full accessibility standards.

Cycle Hire

70 Cycle docking stations already operate at capacity within the vicinity of the Mount Pleasant area and it is anticipated that the development will generate demand for an additional 50 docking points. Whilst TfL's aspiration would be for capacity to be provided as one large docking station, it is understood that both boroughs would prefer two separate facilities. The applicant has produced an indicative plan for an additional 50 cycle docking station points on the footway on Mount Pleasant. On this basis, further discussion about this matter would be appropriate, and subject to the outcome, a section 106 contribution towards implementation will be required along with the safeguarding of land if necessary. If two docking stations are ultimately proposed, their installation should be phased in line with the development itself.

Buses

71 The development is expected to generate an increase of 183 bus two way bus trips. Although requested at the pre application stage, bus trips have not been assigned by route or direction. Even if all trips however, are assumed to be taken in the peak direction, the impact of those trips is not expected to require mitigation.

London Underground

72 London Underground tunnels extend under Farringdon Road, close to this site. As such the design and construction of this development must not increase or decrease the loadings on the tunnels nor compromise the integrity of London Underground's operations as required by the London Plan. A separate response has already been issued by London Underground's Infrastructure Protection team and as such conditions and informatives have been recommended to Islington Council. On-going engagement between the applicant and London Underground engineers is therefore recommended.

73 The impact of the proposed development on the underground network and station capacity has been assessed and no mitigation will be required.

Taxis

74 The access arrangements for the Calthorpe Street block would require the taxi rank on Farringdon Road to relocate 15 metres further east, but retaining the same length. This is acceptable in principle as it is a rest rank rather than a full operational facility however, these works should be provided at the applicant's expense, secured through the section 278 agreement with TfL. The applicant should be reminded to engage with TfL to ensure that that the necessary taxi rank orders can be prepared in consultation with representatives of the taxi trade.

Travel planning

75 Framework travel plans have been submitted, supported by a residential travel plan. The content is acceptable in accordance TfL's ATTrBuTE assessment tool and should be secured through the s106 agreement. Funding arrangements for the implementation and monitoring of the plan should be clarified. In relation to the Royal Mail operations, the proposed intensification of the site would benefit from measures to manage travel demand and similarly, it appears that whilst some parts of Royal Mail operations are signed up to TfL's Freight Operator Recognition Scheme (FORS), the Mount Pleasant site is not. Although the applicant advises that articulated vehicle use is expected to decrease, overall vehicle deliveries will increase and as such FORS membership is also strongly recommended. Further details can be found at http://www.fors-online.org.uk/index.php?page=P_CONTRACTORS.

76 A framework delivery and service plan (DSP) has been submitted, and whilst the content is generally acceptable, it should include proposals to consolidate home deliveries through a concierge service, with facilities such as cold and room temperature storage and capacity for resident's parcels and mail. Similarly the submitted framework construction logistics plan (CLP) appears acceptable, subject to the addition of measures such as street cleaning. These plans should be secured through the s106 agreement. In order to ensure pedestrian and highway safety, all larger vehicles that will access or exit the site would also need to be under the control of a banksman. For construction workers, TfL expects that there should be secure storage for tools and also parking surveys to ensure to parking of vehicles off site.

Crossrail and CIL

77 In accordance with the Mayor's London-wide Community Infrastructure Levy, the charging band for both boroughs is £50 per square metre gross internal area (GIA). The required CIL should be confirmed by the applicant and respective boroughs once the components or phase thereof have been finalised.

78 This site is also within the area where section 106 contributions for Crossrail will be sought however, the Mayor's CIL charge (but not the boroughs') will be treated as a credit towards the section 106 liability. The practical effect of this will be that only the larger of the two amounts will normally be sought. As the CIL charge will not be confirmed until development is about to commence, the section 106 agreement will need to be worded so that if the section 106 contribution based on the assumed CIL proves incorrect the contribution is adjusted accordingly (assuming it is still more than the CIL). As stated above, other contributions towards the mitigation of transport impacts will also be sought in accordance with London Plan policy and with relevant legislation.

79 This indicative contribution for sites within the Central London Charging Area is £140 per square metre GIA for offices and £90 for retail. Based on the figures provided, a total

contribution of £298,920 would be expected for the Calthorpe Road scheme and £93,980 for the Phoenix Place scheme. Further discussion on this aspect would be welcomed.

Local planning authority's position

80 It is understood that the two boroughs are presently reviewing the application, with initial officer concerns regarding the affordable housing in particular, and parking and sustainability are also a concern particularly for Islington. It is anticipated that the applications will be considered in the autumn.

Legal considerations

81 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

82 There are no financial considerations at this stage.

Conclusion

83 London Plan policies regarding the CAZ, mixed use development, housing, affordable housing, tall buildings, strategic views, urban design, access, climate change and transport are relevant to this application. The application broadly complies with the London Plan however, there are some outstanding issues that need to be resolved. These and their potential remedies are set out below.

- **Principle of use:** The principle of a residential-led mixed use development is strongly supported in within this Central London location, providing much needed jobs and homes.
- **Housing:** The scheme provides a high quality residential environment with suitable play space, and an appropriate housing mix. Further information and discussion regarding the viability of the scheme is required in order to demonstrate that the maximum reasonable amount of affordable housing is being provided.
- **Design:** The masterplanning principles are supported, and the design, appearance and public realm is of a high quality, with no adverse impact upon strategic views.
- **Inclusive design:** The inclusive design provisions are welcomed. The 100% Lifetime Homes and 10% wheelchair accessible flats should be secured by condition. Further discussion regarding the location of the accessible units and provision of accessible routes across the landscaping areas would be appropriate.
- **Climate change:** The applicant has broadly followed the energy hierarchy to achieve carbon dioxide emission reductions in line with the London Plan, but confirmation of the combined carbon reductions is required and the potential for the site to be served by a

single energy centre. The applicant's commitments should be secured in the s106 agreement. The sustainability measures proposed are welcomed and should be secured by way of condition.

- **Transport:** The scheme is generally in accordance with London Plan transport policies subject to clarification and further information in relation to access and pedestrian safety, walking and cycling in particular. Relevant conditions and contributions towards cycle routes, cycle hire, Legible London, bus capacity and Crossrail also need to be secured.

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