

Stratford City Student Accommodation

Olympic Delivery Authority

(in the London Borough of Newham)

planning application no. 11/90618/FUMODA

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

Erection of a building up to 90m in height comprising student accommodation for approximately 930 bedspaces together with a coach park at ground level.

The applicant

The applicant is **Unite** and **Stratford City Developments**, and the architect is **BDP**.

Strategic issues

The main issue is whether **student accommodation** on this site within **Stratford City** will compromise the delivery of commercial floorspace and whether there is a demonstrable need for student accommodation in this location.

Further information is required regarding **urban design, inclusive design, climate change** and **transport**.

Recommendation

That the Olympic Delivery Authority be advised that the application does not comply with the London Plan, for the reasons set out in paragraph 82 of this report; but that the possible remedies set out in paragraph 83 of this report could address these deficiencies. The application does not need to be referred back to the Mayor if the Authority resolve to refuse permission, but it must be referred back if the Corporation resolve to grant permission.

Context

1 On 21 October 2011 the Mayor of London received documents from the Olympics Delivery Authority (ODA) 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 1 December 2011 to provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under Category 1B and 1C of the Schedule to the Order 2008:

1B: "Development (other than development which only comprises the provision of houses, flats, or houses and flats) which comprises or includes the erection of a building or buildings— outside Central London and with a total floorspace of more than 15,000 square metres.

1C: 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 the ODA 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 or allow the Authority to determine it itself, unless otherwise advised. In this instance if the Authority resolves to refuse permission it need not refer the application back to the Mayor.

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

Site description

5 The 0.42 hectare site is located within the Stratford City Masterplan area. Abutting the site to the north is the High Speed 1 (HS1) rail line with the Stratford International and DLR station to the east. First Avenue runs along the southern edge of the site whilst there is a road to the west providing access across HS1 to the Olympic Village and another on the eastern side providing access across HS1 to Stratford International and the DLR station.

6 To the east of the site is the Stratford Westfield shopping centre whilst the Olympic Village is located to the north. To the west is the Olympic park with the commercial-led Stratford City Zone 2 being located to the south.

7 The site is currently subject to construction works in order to facilitate a temporary coach park which will be used during the Olympics. The site has extant permission as part of wider redevelopment of the Stratford rail lands site for mixed-use development.

8 The site is very well served by public transport being located within 150 metres of Stratford International Station which offers direct links to London via High Speed one and Docklands Light Railway (DLR). Walking routes through the new Westfield development, or alternatively the DLR, provides connections to Stratford Regional Station for the underground (Central and Jubilee Lines), DLR, mainline railway and bus services. As such, the site currently records a high Public Transport Accessibility Level (PTAL) of five (on a scale of one to six where six is excellent).

Details of the proposal

9 Erection of a building up to 90 metres in height comprising student accommodation for approximately 930 bedspaces together with a coach park at ground level.

10 The building is laid out in a south facing 'U' shape around a second floor podium level communal garden. The form of the building rises from the south west at five storeys around to 28 storeys on the south east corner. A series of roof terraces cascade down from the highest element with the elevations varying from dark brick on the exterior to white/grey brick on the interior.

11 An eleven bay coach park is proposed on the ground floor facing onto the rail line. It is to be accessed from the east with driver accommodation located at the western end of the site.

Case history

12 On 17 February 2005, Newham Council grant outline permission (P/03/0607) for the comprehensive mixed-use development of the Stratford rail lands site. This application set a number of parameters such as land profile, heights and access. In March 2007, an application was submitted to vary a number of the conditions, one of which was to increase the level of residential floorspace.

13 Since that time, Zonal masterplans for the area have been submitted and approved. The Zone One Masterplan was approved on 15 January 2007 (07/90005/AODODA) and a number of reserved matters applications have been approved for the buildings and public realm, including the Westfield Shopping Centre.

14 A pre-application meeting was held on 26 August 2011 regarding the current proposal.

Strategic planning issues and relevant policies and guidance

15 The relevant issues and corresponding policies are as follows:

- Student housing *London Plan*
- Mix of uses *London Plan*
- Urban design *London Plan; PPS1*
- Tall buildings/views *London Plan; RPG3A, Revised View Management Framework SPG; revised draft View Management Framework*
- Inclusive design *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; Mayor's Climate Change Mitigation Strategy; Mayor's Climate Change Mitigation and Energy Strategy; Mayor's Water Strategy; Sustainable Design and Construction SPG*
- Transport *London Plan; the Mayor's Transport Strategy; PPG13; Land for Transport Functions SPG*

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 2001 Unitary Development Plan and the 2011 London Plan.

17 The Newham Core Strategy, which has been through the Examination in Public and the Inspector's reports is expected shortly, is a material consideration.

Principle of development/student housing

18 The site was included within the original outline permission for Stratford City (zones 1-7) for a mixed use development across the site. The site was originally located within Zone 2 of the masterplan but the applicant is currently seeking planning permission to transfer the site into zone 1. The site also has permission for use as a temporary coach park for the Olympics.

Student accommodation

19 London Plan Policy 3.8h states that strategic and local requirements for student housing meeting a demonstrable need are to be addressed by working closely with stakeholders in higher and further education and without compromising capacity for conventional homes.

20 The London Plan recognises in paragraph 3.52 that London's universities make a significant contribution to its economy and labour market and that it is important that their attractiveness and potential growth are not compromised by inadequate provision for new student accommodation. It also recognises that the provision of purpose-built student housing may reduce pressure on other elements of the housing stock currently occupied by students, especially the private rented sector. The SHLAA/HCS has identified capacity for over 17000 student places 2011-2021.

21 Paragraph 3.53 sets out that addressing the demands for student accommodation should not compromise the capacity to meet the need for conventional dwellings, especially affordable family homes, or undermine policy to secure mixed and balanced communities. It recognises that this may raise particular challenges locally and especially in parts of inner London where almost three quarters of the capacity for new student accommodation is concentrated. Student accommodation should be secured as such by planning agreement or condition relating to the use of the land or to its occupation by members of specified educational institutions. If the accommodation is not robustly secured it will normally be subject to the requirements of affordable housing policy.

22 The applicant has undertaken a student needs assessment which identifies a significant shortfall in purpose built student accommodation within Newham. The assessment states that there are approximately 18, 915 students in Newham but only 1,196 student bed spaces and no private built halls. It is likely then that a large amount of students are living in Houses of Multiple Occupation. The applicant therefore argues that there is significant demand for purpose built student accommodation in this location.

23 The applicant is content to have a clause within the S106 agreement that limits the occupation of the building to full time students only and it suggests a cascade mechanism with three tiers. Accommodation would initially be offered to local universities within the Borough, any remaining rooms would then be offered to universities within the adjoining Borough and then finally accommodation would be offered to all full time students. It would be managed by UNITE, a specialist student accommodation provider.

24 The applicant has demonstrated that there is a need for student accommodation and will commit to limiting occupation to full time students only, with local students given first preference. This approach is supported and the application complies with London Plan Policy 3.8h.

25 University College London has recently announced that it is moving to Stratford and there is a good fit between the proposals and Stratford's ongoing regeneration.

26 The principle of student accommodation is acceptable, the applicant has stated that the quantum of commercial space consented in the outline application can be delivered on other sites within zones 1 and 2 and the applicant should show how this will be achieved. The application complies with London Plan Policy 3.8h. The Council should draft an appropriately worded legal agreement including the proposed cascade mechanism and a copy of this agreement should be provided when the application is referred back to the Mayor.

Urban design

27 Good design is central to all objectives of the London Plan, in particular the objective to create a city of diverse, strong, secure and accessible neighbourhoods to which Londoners feel attached whatever their origin, background, age or status. Policies contained within chapter seven specifically look to promote development that reinforces or enhances the character, legibility, permeability and accessibility of neighbourhoods by setting out a series of overarching principles and specific design policies related to site layout, scale, height and massing, internal layout and visual impact.

28 Whilst the proposed development is reasonably well designed, creating high quality student accommodation in a distinctive building on the approach to Stratford City, it is disappointing that a number of issues highlighted at the pre-application meeting have not been addresses. Of particular concern is the relationship between the development and the public realm on its eastern and western elevation.

Site layout

29 The way development is laid out has a significant impact on the quality of the streets and spaces surrounding it. London Plan Policy 7.3 sets out a series of principles to ensure that the design of a development should look to reduce the opportunities for criminal behaviour by maximising activity throughout the day and night, clearly articulating public and private spaces, enabling passive surveillance over public spaces and promoting a sense of ownership and respect. London Plan Policy 7.1 sets out the requirement for developments to reinforce or enhance the permeability and legibility of neighbourhoods, so that communities can easily access community infrastructure, commercial services and public transport. This includes ensuring that routes in and around the site are of high quality and attractive to pedestrians.

30 The proposed development addresses First Avenue well, locating the entrance to the student accommodation and other active communal areas facing on to it. This is supported as it provides activity and overlooking on to the public realm ensuring it feels safe and well used, as well as effectively screening the ground floor coach park from First Avenue.

31 At the pre-application meeting it was highlighted that the uses located on the western edge of the development needed further consideration to ensure they would generate activity and overlooking to make the adjacent street feel safe and well used. It was also recommended that uses located here should be accessed directly from the street.

32 The current proposal responds to this by providing a large area for coach drivers located here with an entrance on First Avenue. Further clarification of how this space will be used and its relationship to the public realm is required. Whilst plans illustrate a waiting room, toilets and a small kitchen, further explanation of how this will be used, how often and by how many people is necessary. There is also concern that the location of the entrance on First Avenue does not contribute to bringing activity to the western elevation of the proposal and would be better located on the bridge instead.

33 A more public use, such as a cafe or a gym, that opens out directly on to the bridge would be a preferable solution to the issues highlighted above. Not only would this would this be more successful at activating this edge of the development, but it would also bringing life to this highly visible elevation that marks the entrance to Stratford City from the west. Further consideration of this is required.

34 Concern was expressed at pre-application stage over the eastern edge of the development and the impact it would have on the public realm adjacent to it. The current layout locates the double-height entrance to the coach park along this edge and creates no enclosure or activity essential to make the street attractive and well used. Whilst further consideration was requested to how the coach park can be 'wrapped' with more active uses so that it does not have a negative impact on this route, it is disappointing that this has not improved and this remains a significant concern.

Internal layout

35 The internal layout of the proposal is arranged on a U shaped footprint, with four vertical circulation cores leading to typically six clusters of nine bedrooms, and five independent studio flats per floor. The internal layout is well thought out ensuring that bedroom clusters do not share the same circulation space, encouraging a strong sense of ownership within each cluster.

36 As highlighted at the pre-application stage, there is concern over the high number of living areas located on the north aspect of the building; these spaces will get no direct sunlight which is likely to impact on how well they are used. Where possible, living spaces should be located so that they receive a good amount of direct sunlight encouraging students to use them.

37 The provision of terraces along the roof of the building is strongly supported. Their orientation ensures that they will receive generous amounts of direct sunlight and the brick skin facade ensures that they are protected from strong winds making them likely to be well used and a significant amenity to the students.

Height and massing

38 The scale, height and massing of a development will have an impact on the legibility, character and adaptability of the surrounding urban area. London Plan policy 7.7 sets out requirements for the location and design of 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. The policy includes requirements for buildings to emphasize points of civic or visual significance and have ground floor activities that provide a positive relationship to surrounding streets and to incorporate the highest standards of architecture.

39 The site of the proposed development is situated at a strategically important gateway into Stratford City from the west, and development here should act as a point of reference, improving the legibility of the area.

40 The massing of the development spirals from 5/13 storeys to the west to 28 storeys on the east. This arrangement ensures good penetration of daylight into most aspects of the building and creates a building of a height that stands out without being overbearing. There are no strategic concerns with the height and massing.

Elevations

41 The elevation of the proposed development is characterised by an external brick skin wrapping a white internal treatment. The skin is textured by a regular pattern of bedroom windows.

42 At pre-application stage this skin was punctured by large protruding white rendered communal spaces irregularly spaced across the elevation. This was welcomed but the current elevation shows a much more regular distribution of these elements and less explicit build out which is disappointing. Consideration needs to be given to re-introducing the random pattern of

puncturing elements as this provided a distinctive elevation to the building and helped articulate the original concept of a brick skin wrapping round a white core.

43 The use of brick is supported as it will create a distinctive building set amongst the proposed glass and metal clad office blocks and shopping centre. At pre-application stage the applicant was asked to give consideration to how the regular texture created by the bedroom windows can be continued as the brick skin wraps round the building on to the roof; this would accentuate the independence of the brick skin from the building mass and avoid otherwise large monotonous expanses of brickwork. Due consideration was not given to this and is still required.

44 As expressed at the pre-application stage, the articulation of the top of the building with vertical slots in the brick skin provided a clear termination to the building as well as shielding the communal terraces from the wind whilst allowing for views to the north. Whilst this treatment was welcomed it has now been changed to be replaced with an additional element fixed on to the brick skin which is disappointing. Further consideration or justification for this change is required.

45 At the pre-application stage concerns were raised about the inner elevations which appeared regular and monotonous. It was suggested that similar measures to those used to break up the northern elevation could be employed on the internal skin, such as protruding elements or an alternate framing treatment to the living areas. These have not been included and this approach should be reconsidered.

46 Further information is required to determine whether the application complies with London Plan design policies. Further consideration is required regarding the ground floor arrangements on the west and east elevations, and the north and south elevational treatments.

Inclusive design

47 Inclusive design principles, if embedded into the development and design process from the outset, help to ensure that all Londoners, including older people, disabled and Deaf people can use the places and spaces proposed comfortably, safely and with dignity. The aim of London Plan policy 7.2 is to ensure that proposals achieve the highest standards of accessibility and inclusion (not just the minimum). London Plan Policy 7.5 requires that London's public spaces should be secure, accessible, easy to understand and maintain and incorporate the highest quality landscaping, planting, furniture and surfaces. The design of the landscaping and the public realm is crucial to how inclusive the development is to many people and the pedestrian routes to each of the buildings on the site should be designed to ensure full and easy access for all users.

48 The design and access statement submitted with the application explains the design thinking behind the application and demonstrates the approach taken to respond to the access needs of disabled people, and has indicated how inclusion might be maintained and managed. The design and access statement shows how disabled people access the building safely, including details of levels, gradients, widths and surface materials of the paths and this is supported. There are however, a number of detailed design issues still to be resolved.

49 The design of the public realm in the immediate vicinity of the entrance into the building could be quite challenging for disabled people (particularly visually impaired people) given the size of the vehicular coach entrance, its location close to the car park entrance on the opposite side of the street, and the location of cycle lanes. It is unclear where the nearest drop off location is, which could be a particular issue at the beginning and end of term.

50 At the pre-application stage, concerns were raised regarding the lack of blue badge parking bays within the site for disabled students. The applicant has now included one space within the

development and has indicated that further blue badge parking is located within the adjacent car park. However, the one parking bay is within the coach park and the adjacent car park entrance is a considerable distance to the entrance into the new building. The proposed Accessibility Management Plan should therefore set out how disabled students and their visitors will be assisted to use these parking spaces safely and easily. The arrangements for parking for blue badge holders should be included within the section 106 agreement.

51 As raised at the pre-application stage, further consideration should be given to the lift access arrangements at the entrance foyer so that lift users do not miss out on the architectural experience of moving through this triple height garden space. The platform lift which was proposed at the pre-application stage, between the coach park to the upper level coach staff office area, has now been replaced with a full passenger lift and this supported. However, a platform lift is still proposed as the only step free access to the belvedere on the top floor of the building. The applicant should consider extending the passenger lift to the top floor as the proposed platform lift is not best practice in a new building.

52 The corridors within the student clusters are just 1050mm wide. This is particularly narrow and may discourage disabled students from visiting their friends in other rooms. London Plan Policy requires that new developments meet the highest levels of accessibility and inclusion, not just the minimum and, as such, the narrow corridors are disappointing. The applicant should reconsider the width of the corridors to ensure that the development is fully inclusive.

53 In terms of internal layout and accessible rooms, educational establishments and service providers have a duty under the Equality Act 2010 (superseding the DDA) to ensure that their facilities and services are accessible for disabled students. There is currently a shortage of wheelchair accessible homes in London, and one of the biggest barriers to disabled students being able to live and study in London is access to suitable accommodation. The ability to accommodate disabled students should be fully integrated into any student housing development.

54 As a form of residential development, ten per cent of student bedrooms should be wheelchair accessible or easily adaptable for occupation by a wheelchair user in line with London Plan Policy 3.8. Best practice standards as set out in the revised British Standard BS 8300: 2009 recommends that 5% of rooms are fully accessible (i.e. meet the standards set out in the building regulations) and that 5% are capable of being adapted at a later date if needed (i.e. with more space to allow use of a mobile hoist, wider doors, walls capable of supporting grab rails and drop down support rails). Given the high quality and specification of this building the aim should be to provide an equivalent level of facility and experience for disabled students - this is particularly important in this location given the proximity to the Olympic Village and the Olympic Park and the efforts made to ensure the environment in Stratford City and the Olympic Park provides an exemplary accessible experience and a legacy of the Paralympic Games.

55 The applicant is proposing that 6% (60) of the rooms are wheelchair adaptable with 1% (10) fitted out initially for immediate occupation by a wheelchair user and a further 5% fitted out if and when demand arises. The applicant states that this fit out will require structural changes to the bathrooms but is confident that such changes will not inhibit uptake of the rooms because of the booking system used by UNITE. As discussed above London Plan Policy states that 10% of rooms should be wheelchair accessible or easily adaptable and the development is required to comply with this policy.

56 In addition, further discussions is required regarding the proposed easily adaptable rooms, which should from the outset have sufficient space within the bedroom and within the bathroom to accommodate a wheelchair user without the need to undertake further structural alterations, leaving only the non structural alterations such as grabrails/hoist etc to be fitted to suit the

individual as needed. The applicant should also provide further information about the process and time required to fit out the remaining rooms capable of adaptation.

57 The Access Statement includes a draft accessibility management plan which is welcomed but it needs considerable further development to reflect the particular circumstances of the building. At the pre-application stage the applicant offered to hold a workshop with its existing disabled users, their access consultant and designers, to discuss the layout and facilities of the accessible rooms and the detail of the Accessibility Management Plan in more detail. This meeting has not yet been held but officers welcome the opportunity to discuss these issues in more depth with the applicant and existing users.

58 Details such as the views out of bedroom windows (heights of window cills and window openers), the views out from the garden and terraced areas for someone sitting down or in a wheelchair (heights and transparency of balustrades), the level of detail within the building to help orientation and wayfinding (signage, use of colour contrast etc), the width and accessibility of all the doors and corridors (within the cluster flats as well as the common corridors) to allow disabled students to access and visit all the rooms, and the design of the external staircases within the garden terraces, are all details which can significantly improve the experience and enjoyment for disabled residents and should be secured at a later stage.

59 Further information is required to determine whether the application complies with London Plan Policy. The applicant should reconsider the use of the platform lift to reach to top floor of the development, the addition of a passenger lift within the atrium and the width of the corridors in parts of the building. The applicant should increase the percentage of wheelchair accessible or easily adaptable room to 10% and it should provide further information regarding the time and work required to fit out the adaptable rooms and reconsider the proportion of rooms that will have the space to accommodate disabled students without the need for further structural alterations. The location and management arrangement of the blue badge parking bay in the coach park and the additional blue badge parking spaces within the adjacent public car park should be secured via the section 106 agreement.

Climate Change

60 A range of passive design features and demand reduction measures are proposed to reduce the carbon emissions of the proposed development. Both air permeability and heat loss parameters will be improved beyond the minimum backstop values required by building regulations. Other features include mechanical ventilation with heat recovery. The demand for cooling will be minimised through the use of low emissivity glazing.

61 The development is estimated to achieve a reduction of 6 tonnes per annum (1%) in regulated carbon dioxide emissions compared to a 2010 Building Regulations compliant development.

District heating

62 The applicant has identified that the Stratford City district heating network is within the vicinity of the development and is proposing to connect to the network. The applicant has had discussions with COFELY who have confirmed that there is capacity available and the infrastructure is in place to serve the site. Details of correspondence with COFELY have been provided.

63 Indicative proposed routes for the heating pipe work have been indicated on the plans and provisions for the district heating network substation has already been allowed for within the plant

room layouts. Connection to the Stratford City District heat network should be secured by condition.

Combined Heat and Power (CHP)

64 The applicant is proposing to connect to the Stratford City heat network, supplied by CHP, to provide the domestic hot water load, as well as a proportion of the space heating.

65 A reduction in regulated carbon dioxide emissions of 552 tonnes per annum (24%) will be achieved through this second part of the energy hierarchy.

Renewable energy technologies

66 The applicant has investigated the feasibility of a range of renewable energy technologies and is proposing to install 200 sq.m. of photovoltaic panels. Roof drawings showing potential location have been provided.

67 A reduction in regulated carbon dioxide emissions of 12 tonnes per annum (2%) will be achieved through this third element of the energy hierarchy.

Summary

68 The estimated regulated carbon emissions of the development are 541 tonnes of carbon dioxide per year after the cumulative effect of energy efficiency measures, CHP and renewable energy has been taken into account.

69 This equates to a reduction of 189 tonnes of carbon dioxide per year in regulated emissions compared to a 2010 Building Regulations compliant development, equivalent to an overall saving of 26%. The carbon dioxide savings meets the targets set within Policy 5.2 and complies with the London Plan.

Transport

70 The Transport Assessment and Travel Plan submitted in support of this application are consistent with TfL guidance, which is supported.

71 In recognition of the site's accessibility, the car free nature of the development is welcome and it is consistent with London Plan policy 6.13. Parking should, however, be controlled through the Section 106 agreement to ensure ineligibility for on-street parking for visitors and students, including for the potential use of the coach parking bays when they are not in use. One disabled parking space is provided on site, which is supported. It is however recommended that given the scale of the development, this be increased to two. It must be noted that all disabled spaces should be designed fully in accordance with the DfT 'Inclusive Mobility' guidance. There is a concern that the current location of the proposed disabled space could conflict with coach movements within the site. It is also not clear how car parking/loading/ drop off for student arrivals and departures at the start and end of term will be managed, although it is noted that a strategy for this purpose will be produced. It is therefore requested that the applicant submits these details for approval to ensure impact to the highway network would be minimised and is acceptable.

72 The recent amendments to the scheme to accommodate larger sized coaches on site and facilities, as discussed at the pre-application stage, is supported. The current submission provides 2x13.5 metre bays and 9x15 metre coach bays, which addresses previous outstanding concern. The coach parking proposal is now considered to be consistent with London Plan policy 6.8, providing

further coach parking facilities with good access to central London. It is understood that the coach parking would be used during the Olympic Games period.

73 The proposal includes 480 cycle parking spaces (including five for staff) which is equivalent to 0.50 cycle space per student residential unit. This level of provision is in line with TfL cycle parking standards and recent decisions made on cycle parking for similar neighbouring developments. The provision of cycle parking is therefore consistent with London Plan policy 6.9, which recognises the need for cycle parking in new residential developments.

74 The use of Stratford International Station should be promoted to connect with the DLR. It is recommended that the installation of DLR docklands arrival information system ('DAISYS') boards or similar live departure information in the communal areas of the development should be provided and secured through the Section 106 agreement. If a DAISY board is the preferred choice, a £20,000 contribution should be identified in the Section 106 agreement to cover its cost. This would encourage the residents to use Stratford International station and promote sustainable travel behaviour.

75 In summary, whilst the application is generally supported in transport terms, a number of issues will need to be resolved before the application is determined and can be considered to comply with the transport policies of the London Plan. Further information is required regarding the number and location of disabled parking spaces and the installation and contribution towards the DLR docklands arrival information system.

Community Infrastructure Levy

76 In accordance with London Plan *policy 8.3*, the Mayor of London proposes to introduce a London-wide Community Infrastructure Levy (CIL) that will be paid by most new development in Greater London. Following consultation on both a Preliminary Draft, and then a Draft Charging Schedule, the Mayor has formally submitted the charging schedule and supporting evidence to the examiner in advance of an examination in public. Subject to the legal process, the Mayor intends to start charging on **1 April 2012**. Any development that receives planning permission after that date will have to pay, including:

- Cases where a planning application was submitted before 1 April 2012, but not approved by then.
- Cases where a borough makes a resolution to grant planning permission before 1 April 2012 but does not formally issue the decision notice until after that date (to allow a section 106 agreement to be signed or referral to the Secretary of State or the Mayor, for example),.

77 The Mayor is proposing to arrange boroughs into three charging bands with rates of £50 / £35 / £20 per square metre of net increase in floor space respectively (see table, below). The proposed development is within the London Borough of Newham where the proposed Mayoral charge is £35 per square metre. More details are available via the GLA website <http://london.gov.uk/>.

78 Within London both the Mayor and boroughs are able to introduce CIL charges and therefore two distinct CIL charges may be applied to development in future. At the present time, borough CIL charges for Redbridge and Wandsworth are the most advanced. The Mayor's CIL will contribute towards the funding of Crossrail.

Mayoral CIL charging zones Zone	London boroughs	Rates (£/sq. m.)
1	Camden, City of London, City of Westminster, Hammersmith and Fulham, Islington, Kensington and Chelsea, Richmond-upon-Thames, Wandsworth	£50
2	Barnet, Brent, Bromley, Ealing, Greenwich, Hackney, Haringey, Harrow, Hillingdon, Hounslow, Kingston upon Thames, Lambeth, Lewisham, Merton, Redbridge, Southwark, Tower Hamlets	£35
3	Barking and Dagenham, Bexley, Croydon, Enfield, Havering, Newham, Sutton, Waltham Forest	£20

Local planning authority's position

79 The ODA's position is unknown.

Legal considerations

80 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 Corporation 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 Corporation under Article 6 of the Order to refuse the application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

Financial considerations

81 There are no financial considerations at this stage.

Conclusion

82 London Plan policies on student accommodation, urban design, inclusive design, 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 the development:** The principle of student accommodation is acceptable, the applicant has stated that the quantum of commercial space consented in the outline application can be delivered on other sites within zones 1 and 2 and the applicant should show how this will be achieved. The application complies with London Plan Policy 3.8h.
- **Urban design:** Further information is required to determine whether the application complies with London Plan design policies.

- **Inclusive design:** Further information is required to determine whether the application complies with London Plan Policy.
- **Climate change:** The carbon dioxide savings meets the targets set within Policy 5.2 and complies with the London Plan.
- **Transport:** Further information is required to determine whether the application complies with London Plan transport policy.

83 On balance, the application does not comply with the London Plan. The following changes might, however, remedy the above-mentioned deficiencies, and could possibly lead to the application becoming compliant with the London Plan:

- **Principle of the development:** The applicant should show how the quantum of commercial space consented in the outline application can be delivered on other sites within zones 1 and 2. The Council should draft an appropriately worded legal agreement including the proposed cascade mechanism and a copy of this agreement should be provided when the application is referred back to the Mayor.
- **Urban design:** Further consideration is required regarding the ground floor arrangements on the west and east elevations, and the north and south elevational treatments.
- **Inclusive design:** The applicant should reconsider the use of the platform lift to reach to top floor of the development, the addition of a passenger lift within the atrium and the width of the corridors in parts of the building. The applicant should increase the percentage of wheelchair accessible or easily adaptable room to 10% and it should provide further information regarding the time and work required to fit out the adaptable rooms and reconsider the proportion of rooms that will have the space to accommodate disabled students without the need for further structural alterations. The location and management arrangement of the blue badge parking bay in the coach park and the additional blue badge parking spaces within the adjacent public car park should be secured via the section 106 agreement.
- **Transport:** Further information is required regarding the number and location of disabled parking spaces and the installation and contribution towards the DLR docklands arrival information system.

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