

Planning Committee Report

London Thames Gateway Development Corporation Planning Application for Determination by the LTGDC

Report of the Director of Planning

UDC CASE No: LTGDC-07-134-FUL	DATE MADE VALID: 22/06/2007
APPLICATION No: 07/01166/LTGDC	TARGET DATE:

APPLICANT:	Seapoint Development Ltd
AGENT:	Stock Woolstencroft
PROPOSAL:	Demolition of existing buildings and partial demolition and extension of Warton House, the subsequent development of six new buildings of between 3 and 43 storeys (plus roof plant level) and the restoration and extension of Warton House to provide 1261 sq m of community or commercial floorspace including 27 subsidised workspace units (A1/A2/B1/D1 uses), 1017 sq m commercial floorspace (suitable for a1-A4/B1/D1 uses) a 6256 sq m 137 bedroom hotel (C1) and 655 x no. studio, one, two, three and four bedroom residential units (C3), plus associated car and cycle parking and landscaped amenity space.
LOCATION:	150 High Street Stratford

1 SUMMARY

- 1.1 This is an application for a major mixed use development close to Stratford Town Centre and opposite the Olympics site on the Waterworks River. The proposal includes 655 residential units, a 137 bedroom hotel, 27 workspace units and other ground floor commercial uses. The site is 1.3 hectares, and is currently occupied by a series of buildings with a range of light industrial, storage and commercial uses as well as associated areas of hard standing. Warton House, a locally listed modernist building on the site, would be retained, refurbished and extended as part of the proposal, for residential and workspace units.

- 1.2 The proposed architecture is contemporary. Residential accommodation would be provided at very high densities, with 35% affordable housing by unit proposed on site. Car parking would be provided at 30%, taking into account 6 car club spaces proposed. A new riverside walk would be created, which would have some limited strategic value as a new public open space. A 'pocket park' is proposed, with a children's playspace area, which would benefit the wider area.
- 1.3 The proposal provides a good residential mix, with welcome family sized duplex units located on the western side of the site, next to the riverside and alongside the pocket park. A 43 storey residential tower is proposed, on the eastern side of the site next to the retained Warton House. The area is in principle suitable for the location of high buildings. CABE and Design for London have expressed concerns about the quality of design of the tower, and their concerns are summarised in this report.
- 1.4 The submitted Environmental Statement demonstrates that the proposed development would not result in unacceptable environmental effects or impacts on the residential amenity experienced within existing and emerging properties in the vicinity of the site. The assessments also illustrate that an appropriate residential environment can be achieved at the site.
- 1.5 Officers are at an advanced stage of discussion with the applicants regarding the section 106, with the intention of achieving an agreement that is in compliance with the LTGDC Planning Obligations Community Benefit Strategy.
- 1.6 On balance, it is considered that the proposals will provide positive regeneration benefits to this area of Stratford, bringing new uses to a currently underused site, and providing access to the waterfront and new public space. The design of buildings, subject to further submission of details and materials are considered to be satisfactory. Design concerns expressed by Cabe and Design for London are not sufficient to merit refusal. Therefore, the application is recommended for approval, subject to completion of a satisfactory section 106 agreement and conditions.

2 SITE AND PROPOSAL

Description of Site and Surroundings

- 2.1 The application site is situated on the south western side of the junction between Stratford High Street and Warton Road. It is bounded to the south east by Stratford High Street, to the north east by Warton road and to the west by the Waterworks River, the eastern most channel of the River Lea.
- 2.2 The site is not within a Conservation Area.
- 2.3 The site is roughly triangular in shape with the sweeping curve of the Waterworks River forming the longest, western site boundary. It covers an area of 1.3 hectares and slopes gradually from south to north. The site is currently occupied by a series of buildings with a range of light industrial, storage and commercial uses as well as associated areas of hardstanding.
- 2.4 In the southern corner of the site, with a frontage onto Stratford High Street

and backing onto the Waterworks River, Warton House is a part four, part five storey building. It was built for the Yardley Company as a site for the manufacture of boxes for its soap products in 1937. The building has a distinctive, modernist inter-war design, and is a local landmark that contributes positively to the townscape of the surrounding area. The building is locally listed, but English Heritage have confirmed that it is not suitable for statutory listing as a building of national architectural or historic interest and as result it enjoys no statutory protection.

- 2.5 To the rear of the High Street frontage, Trinity chapel comprises a three storey red brick building providing 1,115 m² floorspace (D1). The building is currently use as a church and religious centre. The northern sections of the site are occupied by a series of utilitarian, low rise warehouse buildings which provide 4,645 m² storage space. The site is currently accessed from Warton Road.
- 2.6 The existing buildings therefore provide 9453 m² of floorspace and provide employment for 87 people, in a mixture of B1, B8 and D1 uses, the majority of floorspace being warehousing.

Surroundings and adjacent development proposals

- 2.7 The site is located in a mixed-use neighbourhood to the south-west of Stratford town centre. It is located 600 metres south-west of the Stratford town centre boundary, as defined in the London Borough of Newham Unitary Development Plan (UDP) (adopted June 2001). The surrounding area is primarily occupied by residential and industrial uses, whilst the wider area surrounding the site is characterised by a range of land uses and also forms the focus for several large-scale development proposals.
- 2.8 Across Warton Road to the north planning permission has been granted subject to signing a section 106 agreement and referral to the GLA for the construction of a residential-led mixed-use development comprising two buildings between 8 and 27 storeys (including mezzanine level) with 1,130 m² of commercial floor space suitable for Class A1 (Retail), A2 (Financial and Professional Services), A3 (Restaurants and Cafes), B1 (Business) and D1 (Non-Residential Institutions) uses at ground floor and mezzanine levels, and 298 one, two and three bedroom residential units, including landscaped amenity space and 80 car parking spaces, 40 motorcycle parking spaces, and 298 cycle parking spaces. This application was considered by LTGDC committee on 11 October 2007. This scheme is already under construction.
- 2.9 Across Stratford High Street to the east on the north side of Rick Roberts Way LTGDC has resolved to grant planning permission (subject to signing a section 106 agreement and referral to the GLA) for a mixed use development comprising 178 new homes and 946 m² of commercial space A1 (shop), A2 (financial and professional services) A3 (restaurants and cafes) B1 (business) D1 (non residential institutions) and D2 (assembly and leisure). This application was considered by LTGDC committee on 6 December 2006.
- 2.10 Across Stratford High Street to the east on the south side of Rick Roberts Way is a large derelict site which will form a large coach parking area associated with the Olympics.

- 2.11 Further along Warton Road to the west are single storey buildings (Nos. 53-57), which are currently used as vehicle repair workshops and light industrial units, or are vacant. The north-western end of Warton Road is dominated by an 18-storey landmark development that is currently under construction adjacent to the railway viaduct (Icona Stratford, No. 40B Warton Road).
- 2.12 The application site is well located in relation to a range of public transport options and has a Public Transport Accessibility level of 6a in the morning and evening peak. It is situated approximately 600 metres from Stratford Station, which provides access to mainline and suburban rail services, the London Underground network, the Docklands Light Railway (DLR), and 17 local bus routes. In addition, Pudding Mill Lane DLR Station is situated within walking distance to the south-west of the site. The site is also approximately 600 metres south-west of the proposed Stratford High Street DLR Station. In the immediate vicinity of the proposal site, Stratford High Street is served by five bus routes (25, 108, 276, D8 and S2), which provide frequent access to the City of London, the Isle of Dogs and throughout east London. The application site is within comfortable walking distance of a range of shops, services and employment opportunities. A range of new commercial spaces, retail units, and community services are also proposed as part of the emerging developments in the area surrounding the application site. The Stratford City Development to the north of the site will utilise Warton Road as one of the principal vehicular access routes into the development. The Olympic site is also located to the north-west of the site.

Description of Proposal

- 2.13 The proposal is for the demolition of the majority of the existing buildings on the site and redevelopment to provide six new buildings of between 2 and 43 storeys, and the retention and extension of Warton House. The development would provide 27 workspace units (1,261m²; a1/A2/B1/D1 uses) 1017 m² commercial floorspace (suitable for A1-A4/B1/D1 uses) a 6256 m², 153 bedroom hotel (C1) and 655 x studio, one, two, three and four bedroom residential units (C3). The development would also provide landscaped amenity space as well as 161 residential parking spaces, 6 car club parking spaces, 20 hotel parking spaces and cycle and motorcycle parking. Affordable housing is proposed as 35% on site, with 60% of the affordable housing social rented and 40% shared ownership.
- 2.14 The new buildings surround soft and hard landscaped public, communal private and private amenity space, and a publicly accessible riverside walk.
- 2.15 The new buildings proposed are:
- 2.15.1 Building A: a 43 storey residential tower situated at the midpoint of the site's High Street frontage. The building would have a curved plan form and tapered northern elevation. It would include a foyer at ground floor level and 293 residential units in the floors above.
- 2.15.2 Building B: The retained and refurbished Warton House building, with 2 lightweight additional storeys at roof level. The building would accommodate 27 workspace units and 31 residential units. Some of the units may be made available as affordable workspace, subject to suitable provision being made for their operation and funding.

- 2.15.3 Building C: An eleven storey block on the eastern corner of the site, fronting Stratford High Street with a side elevation onto Warton Road. This would accommodate a 137 bedroom hotel.
- 2.15.4 Building D: A ten storey block fronting onto the eastern end of Warton Road. It would provide 495 m² of commercial floorspace and 70 residential units.
- 2.15.5 Building E: a three to ten storey building within the central section of the site. The ten storey part would face north west and south east, with a smaller 3 storey intermediate block creating an L shape that encloses the public square created by Buildings A, C, D and E.
- 2.15.6 Building F: A two to ten storey block with 285 m² commercial floorspace at ground floor and 95 residential units. It will include brown and green roofs.
- 2.15.7 Building G: a two to eight storey block. This would include 44 residential units. The building would include brown and green roofs.
- 2.15.8 Buildings F and G would accommodate the on site social rented affordable housing. Building E would be mixed tenure, included private, shared ownership and social rented housing. Building D would accommodate shared ownership. Private housing would be provided in the 3 storey intermediate block to Building E, Building A (the tower) and Building B (Warton House).
- 2.16 There are 4 areas of landscaped open space proposed on the site, as well as a Riverside Walkway. Buildings F and G enclose a private communal garden area for the residents of units in those buildings, which would also include a passive toddler play area. Between buildings E and F would be what the applicants term a 'pocket park', which provides a landscaped link through the site from Warton Road to the Riverside Walkway, as well as a play area for 0-11 year olds. Buildings A, C, D and E enclose a commercial piazza which would be hard landscaped. This area would also provide a servicing area for the hotel, car club parking, and possible seating areas for the commercial uses at ground floor level in these blocks. A river edge green buffer is proposed on the south western edge of the site. This could accommodate a play area for older children but the precise use of this space needs to be decided. A riverside walkway would be provided along the western boundary adjacent to the river. Again the detail of this also needs to be decided in consultation with the Environment Agency and British Waterways.
- 2.17 The area around Warton House would also be landscaped, and there is provision for a link from the site to the Greenway to be provided at the southern tip of the site, which would link to the riverside walkway.
- 2.18 The buildings on Warton Road have been set back from the existing highway. The footway was relatively narrow at the north western boundary of the site, so setting the buildings back has meant there is more space to accommodate the increased footfall. The junction work that needs to take place for the Stratford City Development means that Warton Road will be significantly widened at the junction with Stratford High Street and the development is therefore set back to accommodate this.

3 MAIN ISSUES

- Land Use
- Housing Mix
- Affordable Housing
- Density
- Design
- Impact on neighbour amenity, and amenity of proposed development
- Transport, Servicing and Parking
- Amenity Space and Public Open Space
- Landscaping
- Moorings
- Planning Obligations

4 RELEVANT SITE HISTORY

Planning History

December 2006

- 4.1 A full planning application was submitted by Seapoint Development Limited for the demolition of existing buildings occupying the site and the subsequent development of seven buildings of between 10 and 41 storeys to provide 3161 m² commercial floorspace (suitable for B1/A1-4/D2 uses) a 5948 m² 144-bedroom hotel C1, a 388 m² PCT surgery (D1), a 378 m² nursery D1 and 736 no.studio, one, two, three and four bedroom residential units (C3), plus associated car and cycle parking, landscaped amenity space and a new landscaped riverside walkway.
- 4.2 This application was withdrawn, following comments by the planning authorities that it was unacceptable for various reasons and officers would recommend refusal of the scheme as submitted.

June 2007

- 4.3 A full planning application was submitted by Seapoint Development Limited for the demolition of the existing buildings and partial demolition and extension of Warton House, the subsequent development of six new buildings of between 3 and 45 storeys and the restoration and extension of Warton House to provide 300 m² of community or commercial floor space (A1/A2/B1 and D1 uses), 435 m² commercial floorspace (suitable for A1-A4/B1/D1 uses), a 4510 m² 153 bedroom hotel (C1), 20 subsidised workspace units (B1) and 690 x no. studio, one, two, three and four bedroom residential units (C3), plus associated car and cycle parking and landscaped amenity space.
- 4.4 This scheme was considered by officers to be an improvement on that previously submitted, but there were still some concerns. Officers welcomed the retention and refurbishment of Warton House. The height of the tower was a concern, as was the height of the perimeter blocks along Warton Road and Stratford High Street.

October 2007

- 4.5 A revision to the above application was submitted on 1 October 2007. This proposal responded to concerns raised in the GLA Stage 1 report, LTGDC

officers and by Newham's Land Panel by increasing the number of workspace units in the development and reducing the height of the perimeter blocks along Stratford High Street and Warton Road, and a 10m reduction in the height of the tower. Consequently the size of the hotel was reduced from 153 bedrooms to 137. An addendum to the Environmental Statement was also submitted, to take account of amendments to the scheme and to clarify a number of issues that were unclear in the original statement. Heads of Terms for the section 106 agreement and a development appraisal were also submitted with this revision. This is the application which is the subject of this report.

5 CONSULTATIONS/NOTIFICATIONS

Environment Agency

- 5.1 Following liaison with applicant no objection to development providing conditions as listed are imposed on any planning permission granted. The conditions are shown at the end of this report. This response is dependent on the following drawing forming part of the planning application: Landscape Masterplan – Ecological Corridor & Public Realm subject to Section 106 (Drawing no. SLD UD20 LM-1 Rev. B). This has been revised since the EA letter, but officers understand that EA has a meeting with the applicant to agree the revised details, but are unlikely to object to the revised application.

British Waterways

- 5.2 Welcomes the principle of the redevelopment, encouraged by mix of uses, and majority of landscaping proposals, including the moorings. Ideally would like more active uses adjacent to the riverside but acknowledge that this would be difficult to achieve. Some concerns about the landscaping to the river edge which would need to be agreed with the applicants, Environment Agency and LTGDC. The construction cycle for the development could potentially be serviced from the canal. Construction waste removed by water and building materials and plant delivered by water. Mooring scheme should be designed to take into account waterborne freight requirements.
- 5.3 Proposed development should contribute to environmental improvements to local canal environment.

London City Airport

- 5.4 No formal response as yet. Did not object to the original application (December 2006) and by are unlikely to object to this proposal as it is lower. Requested condition be added regarding height of cranes during construction.

Olympic Delivery Authority

- 5.5 No objection to proposed development. Concerns expressed regarding construction conflicts, transport assessment and security. Welcome retention and refurbishment of Warton House, but applicants should be made aware of potential impact from the proposed adjacent Olympic Games time pedestrian Greenway crossing over Stratford High Street.

- 5.6 Consider parking levels of 30% are acceptable, and would welcome extension of Stratford Town Centre CPZ to Warton Road with residents and users of development excluded from eligibility for parking permits.
- 5.7 The height and density of development will mean there would be significant numbers of people living and working in the development which could give rise to security issues during staging for the Olympic Games. Therefore suggest various conditions relating to security.

London Fire and Emergency Planning Authority

- 5.8 The Brigade is satisfied with the proposal subject to compliance with various comments raised. Most of these refer to building control requirements, but one is in relation to ensuring that access to the large underground car park is clear. Architects to confirm that this has been complied with.

London Borough of Newham

- 5.9 The application was reported to Newham’s Land Panel, in August 2007 and October 2007. In August the panel raised a number of concerns; in October the panel felt the revised proposals had overcome these concerns.
- 5.10 It is anticipated that the application will be reported to Newham’s committee on the 7 November 2007.

Commission for Architecture and Built Environment (CABE)

- 5.11 Unable to support the revised planning application. Note minor refinement made to massing, layout of units, architecture and open space. Revision are not able to address fundamental concerns about the quantum and architectural quality of development proposed. Think the architects and clients need to reconsider the brief and urban design strategy for this project.

Greater London Authority

- 5.12 The Mayor considered the application on 5 September 2007.
- 5.13 The Mayor supported the principle of a high-density residential led mixed use development in this location and specifically the development of a tall building of 45 storeys subject to the design being of an exceptional quality, given its proximity to the Olympic site and its visibility in longer views. The points shown in the following table were raised. Since then the application has been revised to address some of the points raised, and where applicable this is also indicated in the table.

Issue raised by GLA	How issue has been addressed
Explore the feasibility of increasing the amount of commercial, particularly workshop, floorspace provided within the development.	The number of workspace units has increased from 20 to 27 units. Excluding the hotel, the commercial floorspace has increased from 1525 m ² to 2278 m ² .
Increase the number of large affordable family units within the development.	The number of social rented 3 and 4 bedroom properties has increased from 49 to 57, shared ownership 3 and 4 bedroom properties have stayed the same overall.

Provide clarification that all shared equity housing within the scheme will be affordable at the levels set out in the Mayor's Housing Supplementary Planning Guidance (2005).	The applicant has confirmed that all of the shared equity units will be affordable at the levels set out in the Mayor's Housing Supplementary Planning Guidance (2005).
Explore the potential for creating more generous children's play space within the development.	The proposed development will include two dedicated play areas totalling 1185 m ² .
Clarify that a financial contribution will be made towards the upgrading of children's play facilities within the existing open space located nearby on the Carpenters Estate.	This is discussed further below as part of the assessment of the scheme against the Corporation's Planning Obligations Strategy
Demonstrate that the use of demand reduction measures will bring the carbon emission below 2006 building regulations requirements.	This information has been provided in the revised energy assessment and the ES addendum report.
Provide further information on the design of the proposed CHP, and in particular further information on cooling loads in order to assess the viability of absorption chillers (tri-generation).	Insufficient data is available to allow a detailed analysis of the predicted cooling loads at the site as the commercial units are to be developed to shell and core. Tri-generation using absorption chillers are not considered feasible as the CHP has been maximised to supply the majority of the site electrical demand with all thermal energy being utilised. There is therefore no excess heat to drive an absorption chiller.
Investigate the feasibility of linking this to the adjacent nearby development at 160-188 High Street (PDU/0584b) in a heating and/ or cooling network.	Not feasible as the adjacent developments construction programme already well developed. Proposed energy centre designed for development alone and insufficient plant capacity or space for an extension to cover the neighbouring development
Investigate further the feasibility of linking the scheme to the proposed CCHP/ district heating scheme at the nearby Olympic Park.	Currently being investigated, support the potential connection providing the feasibility study demonstrates that it is a practical and viable option.
Redesign the internal layouts of residential units within the development so that only non-habitable rooms face onto the High Street, or failing that, ensure habitable rooms have dual aspect designs with one facade facing onto a quieter area. Any rooms unavoidably facing onto the noisiest	The social rented units in Block F on Warton Road have been redesigned so they are dual aspect. There are still single aspect units with habitable rooms on Warton Road within Block D – approximately 5 per floor. Warton House which would be converted to provide residential accommodation from 2 nd to 5 th floor also has single aspect

side will need appropriate glazing and ventilation as set out in the report.	units onto the High Street, but as this is a conversion it is accepted that it would be more difficult to avoid this in this building.
Provide further information to enable an assessment of the extent of the shadowing impact of the current proposals on existing nearby development including Carpenter's Primary School and of the cumulative impact in relation to previously approved and current schemes on the nearby LD Toys site.	This has been provided and is discussed further in the assessment section of this report
Address the cumulative air quality impacts with other developments in the area.	The applicants state that as the Transport assessment concludes that the proposed development and neighbouring schemes will result in a negligible impact in terms of traffic volumes, the combined effect of the developments on local air quality will be insignificant.
Explore the potential for reducing the level of car parking particularly for the hotel, within the development.	The proposed level of car parking for the hotel represents one space per eight rooms. This level of provision is a requirement of hotel operators, is considered acceptable by LB Newham's highways officers and is significantly lower than the provision at the nearby Holiday Inn Hotel which has one space per five rooms.
Ensure disabled parking spaces are 10% of the total residential provision.	The development will provide a 10% level of disabled parking.
Increase cycle parking provision in line with TfL requirements of at least one cycle space per residential unit.	The proposed level of cycle parking has been agreed by TfL. The use of the cycle parking will be monitored and the number of spaces can be increased if required.
Provide cycle facilities for visitors to the commercial and leisure uses in line with the London Cycle Network Design Manual.	The applicant is committed to providing visitor cycle parking at the site. This can be secured by condition.
Make a financial contribution towards: improving the pedestrian environment between the site and the station; the implementation of a controlled parking zone within the area and; the upgrading of the junction of High Street and Warton Road.	This is discussed further below as part of the assessment of the scheme against the Corporations Planning Obligations Strategy
Finance the provision of DAISY (Docklands Arrival Information	This is discussed further below as part of the assessment of the scheme against the

System) boards in the development, suitable for upgrade to display information for multi-modal travel in the future.	Corporations Planning Obligations Strategy
Agree to the payment of financial contribution towards additional capacity to mitigate the impact of the additional bus patronage generated by the proposed development.	This is discussed further below as part of the assessment of the scheme against the Corporations Planning Obligations Strategy
Produce separate travel plans for the different components of the development, as well as a construction travel plan	This would be required through the section 106 agreement and is discussed further below
Agree to initiatives suggested by the LDA, which seek to ensure that local residents and businesses benefit from jobs created by this proposal, particularly Black, Asian and minority ethnic (BAME) groups and disabled persons or groups.	This would be required through the section 106 agreement and is discussed further below.

Newham Primary Care Trust

5.14 The applicants originally proposed space for a Primary Care Trust facility on this site. However, government advice in relation to provision of primary care services has now changed, and much larger 'poly clinic' spaces are now required. Therefore, the accommodation on this site would not be suitable for primary care facilities. The PCT have used the Healthy Urban Development model to generate a prediction of future impact on the health service from the occupants of the development. This generates a capital cost of meeting that impact and the revenue cost for one year. For this development this is £1.9 million. The PCT would use any contribution to fund the creation of appropriate facilities and ensure services are prepared to meet the influx of the new population. The PCT notes the use of the LTGDC tariff approach to the planning obligations on this development, and say they would expect a contribution to health needs from this money.

Thames Water

5.15 Comment that the existing water supply infrastructure has insufficient capacity to meet the additional demands for the proposed development, and suggest a condition to identify capacity required. Various other conditions and informatives relating to waste water and surface water discharges suggested.

6 APPLICATION PUBLICITY

- 6.1 Site Notice Expiry: 11/07/2007
- 6.2 Press Notice Expiry: 31/10/2007
- 6.3 Neighbour Notification:

Original

<i>Number of Letters Sent</i>	292	292
<i>Number of responses Received</i>	1	0
<i>Number in Support</i>	0	0
<i>Number of Objections</i>	1	0

- 6.4 Because of the post strike these letters went out late, and the neighbour consultation period will expire on 6th November 07. Any responses that are received before committee will either be included in an addendum report or reported verbally.

7 REPRESENTATIONS

- 7.1 Individual Comment – one response asking when detailed drawings would be available on the Newham Website and how long construction of the development would take.

8 RELEVANT PLANNING POLICY

8.1 Planning Policy Guidance

PPG4 - Industrial, Commercial Development and Small Firms
PPG13 – Transport
PPG24 – Planning and Noise
PPS1 - Delivering Sustainable Development
PPS3 – Housing
PPS25 – Development and Flood Risk

8.2 The London Plan (Feb 2004)

Policy 2A.1 - Sustainability Criteria
Policy 2A.2 - Opportunity Areas
Policy 2A.4 - Areas for Regeneration
Policy 3A.1 - Increasing London's Supply of Housing
Policy 3A.2 - Borough Housing Targets
Policy 3A.3 - Efficient Use of Stock
Policy 3A.4 - Housing Choice
Policy 3A.5 - Large Residential Developments
Policy 3A.6 - Definition of Affordable Housing
Policy 3A.7 - Affordable Housing Targets
Policy 3A.8 - Negotiating Affordable Housing in Individual Private Residential and

8.3 Mixed-Use Schemes

Policy 3B.1 - Developing London's Economy
Policy 3B.2 - Office Demand and Supply
Policy 3B.3 - Office Provision
Policy 3B.4 - Mixed Use Development
Policy 3B.12 - Improving the Skills and Employment Opportunities for Londoners
Policy 3C.1 - Integrating Transport and Development

Policy 3C.2 - Matching Development to Transport Capacity
 Policy 3C.3 - Sustainable Transport in London
 Policy 3C.20 - Improving Conditions for Walking
 Policy 3C.21 - Improving Conditions for Cycling
 Policy 3C.22 - Parking Strategy
 Policy 4A.6 - Improving Air Quality
 Policy 4A.7 - Energy Efficiency and Renewable Energy
 Policy 4A.8 - Energy Assessment
 Policy 4A.9 - Providing for Renewable Energy
 Policy 4A.10 - Supporting the Provision of Renewable Energy
 Policy 4A.11 - Water Supplies
 Policy 4A.12 - Water Quality
 Policy 4A.13 - Water and Sewerage Infrastructure
 Policy 4A.14 - Reducing Noise
 Policy 4B.1 - Design Principles for a Compact City
 Policy 4B.2 - Promoting World-Class Architecture and Design
 Policy 4B.3 - Maximising the Potential of Sites
 Policy 4B.4 - Enhancing the Quality of the Public Realm
 Policy 4B.5 - Creating an Inclusive Environment
 Policy 4B.6 - Sustainable Design and Construction
 Policy 4B.7 - Respect Local Context and Communities
 Policy 4B.8 - Tall Buildings – Location
 Policy 4B.9 - Large-Scale Buildings – Design and Impact
 Policy 4B.14 - Archaeology
 Policy 4C.6 - Flood Plains
 Policy 4C.8 - Sustainable Drainage
 Policy 5C.1 - The Strategic Priorities for East London
 Policy 5C.2 - Opportunity Areas in East London

LB Newham UDP & LDF

8.4 The relevant policies of the Council's Unitary Development Plan (adopted June 2001) and saved from the 27th of September 2007 in accordance with the direction from the Secretary of State are as follows:

S1 - Community Safety and Crime Reduction
 S2 – Community Benefit / Planning Obligations
 S3 - Quality of Development
 S4 - Sustainable Development
 S5 - Priority Development Nodes
 S6 - Mixed Use Development
 S7 - Urban Regeneration: Promotion of Development
 S9 - Environmental Quality: Design Issues
 S10 - Environmental Quality: Neglected, Derelict and Vacant Land
 S12 - Environmental Quality: Improvements in Key Areas
 S19 - Housing: Extending the Range of Housing Choice
 S20 - Housing: Inclusion of Affordable Housing in New Housing Schemes
 S22 - Housing: Mix and Density
 S23 - Housing: Improvement of Public and Private Dwellings and Residential Environment
 S24 - Employment: Meeting the Council's Regeneration Objectives
 S28 - Employment: Quality of Development
 S30 – Shopping: New Retail Development
 S35 - Transport: Encouragement of Alternatives to the Motor Car
 S37 - Transport: Improvement of Facilities for Pedestrians and Cyclists
 S38 - Transport: Parking

UR14 - Stratford Rail Lands: Land Use Proposals
 UR15 - Stratford Rail Lands: Urban Framework Plan
 UR18 – Stratford Rail Lands: Road Access
 EQ2 - Waterside Access
 EQ3 - Waterside Commercial Development
 EQ4 - Quality of Waterside Development
 EQ8 Areas Liable to Flood
 EQ18 - Promoting Urban Quality
 EQ19 - Urban Design Considerations
 EQ20 - Design Considerations: Residential Areas
 EQ21 - New Development: Landscaping
 EQ25 - Access
 EQ26 - Safety
 EQ27 - High Buildings: Control
 EQ28 - High Buildings: Design Considerations
 EQ36 Buildings of local interest
 EQ43 – Archaeology: Investigation, Excavation and Protection
 EQ44 - Vacant Land: Environmental Improvements
 EQ45 - Pollution
 EQ46 - Air Quality Management
 EQ47 - Noise Impact Statement
 EQ48 - Noise - Sensitive Development
 EQ49 – Contaminated Land: Assessment, Remediation and Monitoring
 EQ54 - Promoting Sustainable Waste Management
 EQ61 – Recycling
 EQ62 – Protection of the Flood Plain and Urban Washlands
 EQ63 - Surface Water Disposal
 H6 - Affordable Housing
 H13 - Promoting Quality in Housing
 H14 - Promoting Choice in Housing
 H15 - Housing Mix
 H16 - Density
 H17 - Housing Design and Layout
 CS1 Protection of sites in community use
 EMP1 - Employment Growth
 EMP3 - Quality of Employment Development
 EMP6 - Diversification and Strengthening of Economy
 T1 – New Development: Environmental Impact
 T2 – New Development: Public Transport Accessibility
 T3 – New Development: Highway Capacity
 T4 – New Development: Areas in Need of Major Highway Public Transport Investment
 T5 – Preferred Modes of Transport
 T10 – Road Hierarchy: Relation to Development Proposals
 T14 – Design to Minimise Road Accidents in New Development
 T19 - Improvement of Conditions for Pedestrians
 T24 - Access by Cycle and Cycle Parking
 T26 - Motorcycle Parking

8.4 London Borough of Newham Local Development Framework – Draft Preferred Options for the Core Strategy (February 2006)

6.2 – Quality of Design
 6.3 – Promoting Environmental Sustainability
 6.4 – Community Safety and Design
 6.5 – Creating an Accessible Environment
 6.6 – Tall Buildings

- 6.8 – Energy Efficiency and Renewable Energy
- 6.9 – Water Use, Supply and Quality
- 6.10 – Flood Protection and Sustainable Drainage
- 6.18 – Housing Supply
- 6.19 – Sustaining Mixed Communities
- 6.20 - Housing Density
- 6.21 - Affordable Housing
- 6.22 – Provision of Family Housing (Unit Size and Tenure Mix)
- 6.26 - Internal Space Standards for New Homes
- 6.29 – Accessible Housing
- 6.48 – Transport and New Development
- 6.48 – Transport Assessments and Green Travel Plans
- 6.52 – Pedestrians, Cyclists and Motorcyclists
- 6.53 – Parking and New Development
- 6.55 – Reduced Car Parking Development
- 6.56 – Public Open Space Standards in New Housing Development
- 6.59 – Open Space Improvement
- 6.62 – Amenity Space Standards in Residential Development
- 6.74 – Section 106 Contributions

8.5 Other Relevant Planning Policies & Supplementary Planning Guidance (SPGs)

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 London Borough of Newham Unitary Development Plan (UDP) adopted in June 2001, and the London Plan adopted in February 2004. The site is designated in the adopted UDP as a Major Opportunity Zone (M.O.Z. 1).

The site is also located within an Archaeology Priority Zone as identified in the UDP.

Mayor of London SPGs:

Housing (November 2005)

Accessible London: Achieving an Inclusive Environment (April 2004)

Sustainable Design and Construction (May 2006)

Draft SPG: Providing for Children and Young People's Play and Informal Recreation (October 2006)

Lower Lea Valley Opportunity Area Planning Framework (LLV OAPF):

Also of relevance to the consideration of the scheme is the Lower Lea Valley Opportunity Area Planning Framework (LLV OAPF), which was adopted by the Mayor in January 2007 and identifies the site for potential residential, mixed use, retail, and commercial uses.

London Borough of Newham SPGs:

Residential Planning Guidelines (2001)

Environmental Sustainability Checklist for Major Development (2004)

Flat Conversions (2001)

Business, Industry and Warehousing (1998)

CABE and English Heritage "Guidance on Tall Buildings" (July 2007).

9 ASSESSMENT OF MAIN ISSUES

Land Use

- 9.1 The application site is located in a Newham Major Opportunity Zone (MOZ) where the Borough is seeking to promote 'imaginative proposals'. In the OAPF the site is designated as 'other industrial areas' where according to development principle D4, planning authorities should continue to protect industrial capacity, but should look to satisfactorily introduce additional uses and activities. In such areas 'Industrial uses could be mixed with other uses, subject to industrial use being the primary use'.

- 9.2 The existing buildings provide 9453 m2 of commercial floorspace and provide employment for 87 people. The proposed development would provide 8,534 m2 of commercial floorspace of which 6,256 m2 would be hotel. The 1261 m2 of workshop floorspace is welcomed, but it should be noted that if these are to be subsidised, the applicants propose that it should be funded as part of the contribution they are making through the LTGDC Planning Obligations Community Benefit Strategy if subsidy is not available from elsewhere - which is the safest assumption. The other 1017 m2 commercial units are likely to be a mixture of A1-A4/B1/D1 uses, the precise breakdown of which is flexible.
- 9.3 The applicant has calculated that the level of employment on the site the proposals would generate would be almost double existing levels, although the nature of employment will change with the development generating more service sector jobs. The overall quantum of workspace has been increased to better meet the objectives of the OAPF. It is considered that this space should be capable of use by the full range of B1a-c uses, and a condition could be attached to any permission to ensure this.
- 9.4 Although the proposals would not result in 'industrial use being the primary use' as required by the OAPF, the scheme nonetheless has the potential to deliver significant new employment while also delivering a large number of new homes in this highly accessible location close to Stratford town centre, as well as opening up public access to the river edge.
- 9.5 There would be some loss of D1 floorspace as part of the proposal, as some of the site is in use as a church. However, it is understood that the church are now moving to alternative accommodation. Therefore it is not considered that the loss of this floorspace should preclude redevelopment of the site for alternative uses, as the loss of the floorspace would be in accordance with policy CS1 of the UDP.
- 9.6 On balance, the proposed land use change from primarily industrial to residential led mixed used development, with the level of commercial floorspace proposed is considered acceptable, and to reflect the MOZ designation.

Housing Mix

- 9.7 The application proposes a total of 655 residential units. Of these 35% will be affordable, with 60% of the affordable units being social rented and 40% shared ownership.
- 9.8 The mix of units is set out in the table below

	Studio	1 bed	2 bed	3 bed	4 bed	Total
Social rented	0	40	41	47	10	138
Shared Ownership	2	30	50	8	1	91
Market	14	192	158	60	2	426
Total	16	262	249	115	13	655

- 9.9 .It is considered that the proposed mix provides an appropriate mix of units on the site, in accordance with UDP policy H15 and is supported by Newham Housing Department. The larger family units are concentrated on the north west side of the site, closest to the river and away from the busier Stratford High Street side. The smaller units are concentrated in the proposed tower, the upper floors of the retained Warton House and in the block around the central public square.

Affordable Housing

- 9.10 Of the 655 units proposed 35% will be affordable, with 60% of the affordable units being social rented and 40% shared ownership. This is below the 50% strategic target set out in the London Plan; and the split between social rented and shared ownership is also below the 70% 30% split sought in the London Plan. However, the surrounding area already has a large proportion of social housing, with the large local authority Carpenters Estate situated on the other side of Warton Road. Therefore it is considered that in this area and on this site provision of 35% affordable housing with a 60%-40% split is acceptable.

Density

- 9.11 The density of the development is 1,404 habitable rooms per hectare, based on a site area of 1.3ha. Although this proposed density exceeds the recommended density range set out in the London Plan (Policy 4B.3), it is considered acceptable in this context because of the high public transport accessibility, the long river front aspect and proximity to shops, services and the proposed Olympic Park across the Waterworks River. Private amenity space provision, car parking provision, environmental impact of the development and the standard of residential accommodation are all acceptable in the context and are discussed further below.

Design

Building B: Retention, refurbishment and extension of Warton House

- 9.12 Officers welcome the retention of Warton House. It is a locally listed building and an attractive local landmark. Development plan policies favour its retention and reuse although there are not statutory powers to require the retention as it is locally listed rather than on the statutory list of buildings of special architectural or historic interest, and is not in a Conservation Area. The adaptation and reuse of the building has been incorporated into the comprehensive design for the site. A section of the northern end of the building would be demolished, to enable more space between the proposed tower (Building A). and provision of a residential entrance to Warton House. The removal of the northern section of the building and reconstruction of the north eastern elevation will not unduly affect the special interest of the building and is considered to be acceptable. The design of the lightweight two storey extension to the building is considered to be an appropriate response to the architectural character of the building and is acceptable in design terms. The building would be refurbished as part of the proposals, and this presents an opportunity for unsympathetic alterations that have occurred in the past, including replacement windows,

over painting and the application of fibreglass cladding to be removed. The retention of the Yardley Box Factory would have a positive effect on the local townscape, and would help to bring interest and diversity to the High Street by retaining a range of building types, ages and styles. It is recommended that conditions are attached to any permission requiring submission of further information on materials for the roof extension replacement windows and new northern elevation. Also, it is recommended that the section 106 agreement includes provisions requiring the retention of the building as part of the planning permission for the scheme, so that the developers agree not to demolish the building at a later date.

Building A: 43 storey tower

- 9.13 Building A is a proposed 43 storey tower, which would be situated to the north of Warton House in the middle of the Stratford High Street frontage of the site.

Principle

- 9.14 The Newham UDP, policy EQ28 says that consideration will be given to high buildings on the periphery of Stratford Town Centre. Policy 4B.8 of the London Plan states that the “mayor will promote the development of tall buildings where they create attractive landmarks enhancing London’s character, help to provide a coherent location for economic clusters of related activities and / or act as a catalyst for regeneration and where they are also acceptable in terms of design and impact on their surroundings” The proposed tower is not located within any strategic viewing corridors. In principle therefore, high buildings are acceptable in the area and on this site.

Detailed design considerations

- 9.15 However, policy 4B.9 of the London Plan, Large-scale buildings – design and impact states that tall buildings should be of the highest quality design and should meet a number of particular criteria. It is considered that most of these have been partly addressed. There are a number of outstanding concerns including:
- 9.16 The bulk of the building when viewed from certain angles does not provide an elegant addition to the skyline. The orientation of the building means it presents an elegant profile to the south east and north east, but not to the south west and north west. Design details and materials will be critical for this aspect.
- 9.17 The height of the building has been reduced following concerns expressed by London Borough of Newham from 148m to 137.5m in height. Detailed amendments have also been made to the elevations. Design for London consider that although many of the recent changes to the height and elevation are welcomed, concerns remain over whether the proposals could be considered to be ‘world-class’.
- 9.18 Local views are of a mixed quality with a number of tall residential blocks in the locality. This building would be the tallest building in the locality, taking into account existing buildings and applications that are currently being considered or have been granted.

- 9.19 The proposed tower will be extremely visible from the surrounding area, especially from the future Olympic Park and the Carpenters Estate.
- 9.20 In terms of its impact on microclimate, the proposal is generally considered to be acceptable. The Environmental Statement indicates that the majority of locations within the site will have an acceptable wind environment, with the windiest location to the south of the tower. It is anticipated that with mitigation measures including screening and planting, that an acceptable wind environment will be achieved.
- 9.21 Impacts on overshadowing are generally acceptable. The main impact of concern is the overshadowing to Carpenters Primary School playing fields on the other side of Warton Road. However planning permission has already been granted for development at 160-188 High Street which would have the greatest impact on overshadowing of the playing fields. The increased impact on overshadowing from 150 High Street is limited, and considered to be an acceptable impact.

Building C: Hotel

- 9.22 The proposed building is 11 storeys tall, with the top 2 floors constructed of lighter weight materials to reduce their perceived impact. The emerging Urban Design Strategy for Stratford High Street suggests that buildings along the High Street should generally be 8 storeys. At this point, next to a main cross road at the High Street, and considering that the building will be set back from the High Street to accommodate the junction improvements necessary for Stratford City, the proposed height of 11 storeys is considered to be acceptable.
- 9.23 Design for London are concerned that the primary entrances to the hotel and its bar and restaurant are from the courtyard, with a blank façade of circulation cores and the kitchen addressing the pavement. However, there are residential entrances to the tower proposed on the High Street side, and an entrance to the hotel reception area. It is considered that on balance this is likely to be acceptable. It is likely that when an operator is found for the hotel, further detail on this area would be submitted. Therefore the precise detail and arrangements of the ground floor can be reserved by condition.

Building D:

- 9.24 This building would provide residential entrances and commercial uses at ground floor, with shared ownership residential units above. Warton Road is considered an appropriate location for active ground floor commercial uses. Access to the commercial uses is also proposed from the public courtyard to the rear. Because of the sloping nature of the site and need to provide underground car parking, the commercial units are set approximately 1.2m higher than the pavement on Warton Road, and would therefore be set on a plinth behind balustrades. Although this is not ideal, it is considered acceptable in principle given the site constraints. It is not clear however what the proposals are to provide accessible links between Warton Road and the commercial units. The scheme must ensure the contribution of commercial units to Warton Road is maximised, and the units are fully accessible and inviting to all. Details of the exact form and layout of this area will therefore be reserved by condition.

- 9.25 The overall bulk and massing of this building, is a storey lower than building C on Stratford High Street. As Warton Road is subsidiary to Stratford High Street, this is considered appropriate. Although on other side streets a lower number of storeys would be sought, it is considered that given the widening on Warton Road to accommodate junction improvements for Stratford City, that the overall height and bulk is acceptable.

Building E

- 9.26 This block would accommodate mixed tenure housing units, with commercial floorspace on the ground floor fronting the public square, with residential units facing onto the 'pocket park'. Large duplex units fronting onto the pocket park would have small private front gardens.

Building F and G

- 9.27 These two buildings are primarily residential, and in general the ground floor residential and commercial units have a clear relationship with the surrounding streets and pedestrian routes. 2 storey duplex houses with private front gardens that face onto the river and back on to the private communal open space are proposed, and these are welcomed. Other duplex apartments also have convenient access to the private communal space, and garden which front onto Bridgewater Road and the 'pocket park' between blocks E and F. Good access to the open spaces would be provided. Units fronting onto Warton Road are dual aspect so the rear faces onto the private communal garden. The elevational treatment shown on this block is acceptable.

Impact on neighbour amenity, and amenity of proposed development

- 9.28 The Environmental Statement shows that some of the units in the proposed development would be darker than would be ideal. However, in some cases this is because of the provision of external balconies which reduce the light into the habitable rooms. Given the high density of the development and the context of the site in an urban area it is considered that on balance an acceptable residential environment in terms of daylight and sunlight would be achieved in the development as a whole.
- 9.29 The air quality and noise assessments undertaken as part of the Environmental Impact Assessment demonstrate that a satisfactory residential environment can be achieved in terms of air quality and noise.
- 9.30 The layout of the proposed blocks ensures that the separation distances between the proposal and neighbouring properties are sufficient to prevent any overlooking and loss of privacy. The closest neighbouring occupiers would be over 20 metres away on the opposite site of Warton Road.
- 9.31 The EIA shows that the development would have an impact on the daylight and sunlight reaching the development under construction on the LD Toys site, at 160-188 High Street. However, this impact has not been quantified since Block D was reduced in height by 2 storeys and C was reduced in height by 1 storeys as part of the latest revisions. Nonetheless it is considered that the impact would be lessened by this revision, and that the impact is therefore, on balance acceptable. The impact on other proposed developments in the vicinity is shown to be acceptable with regard to the BRE guidelines on daylight and sunlight in the Environmental Statement.

Transport, Servicing and Parking

9.32 The site is just outside the Stratford Controlled Parking Zone. The transport assessment states that if and when the CPZ is extended the Applicants would be willing to enter into an agreement whereby future residents of the units were not eligible for a car parking permit, essentially making the development 'car capped'. This will be incorporated into the section 106 agreement.

9.33 The applicants have sought to provide the equivalent of 30% on site car parking, in the basement of blocks A, C, D and E; at ground level of blocks F and G; and 6 car club spaces in the public courtyard formed by blocks A, C, D and E. Provision is shown in the table below.

	Residential	Hotel	Motorcycle Spaces	Bicycle Spaces
Basement A, C, D, E	144	20 spaces (in ten stacking units)	28	320
Ground floor F and G	36 (6 Car Club spaces)		6	25
Ground floor A, C, D, E	17			60
Ground floor B				25
Total	197	10	34	430

9.34 The provision of on site car parking at 30% is considered to be appropriate for the site, given the high PTAL rating and mix of uses within the area. The level of bicycle and motorcycle parking is also considered to be acceptable.

9.35 Newham transport have commented that the arrangements for access to the site are generally acceptable, subject to conditions requiring submission of details.

Amenity Space and Public Open Space

9.36 Amenity space provision is relatively good. All the social rented housing and shared ownership housing have private amenity space in the form of balconies. Of the scheme as a whole 20% of the units do not have private balconies. These are 107 market units in the Building A (Tower), and 25 market units in Building B (Warton House). The residents of the tower would have access to the communal sky gardens. It is recognised that it is more difficult to provide private balconies for these units, as they would become less useable in the higher sections of the tower, and because Warton House is an industrial building without balconies being part converted to residential. This is shown on the table below. Although the private amenity provision is below that sought by Newham's UDP and SPG, it is considered that on balance, it is acceptable, in the context of a high density mixed use scheme.

Breakdown of balcony amenity
Building A 1105 m ² private balconies (including gardens 65m ²)
Building B – 243 m ² private terraces

Building C - n/a
Building D/E/F/G 1170 m ² 442 units
Total 2685 m²

9.37 All balconies are larger than Design for London's recommended size of 1.1 x 1.5 (1.65 m²), and the average for blocks D/E/F/G is 2.64 m²

9.38 20 units have private gardens, and these total 320 m².

Communal private open space – 'secret garden' -	320 m ²
Communal private space- sky gardens	65 m ²
Area of riverside walk -	2224 m ² (not including eco play area @ 440 m ²)
Area of pocket park -	720 m ²
Area of play space in pocket park -	450 m ²
Area of play area in secret garden -	132 m ²
Area of other areas – Town Square	1390 m ²
Area around base of tower / piazza around Warton House -	450 m ² (included in riverside walk)

9.39 Communal private open space and public open space is shown in the table above. It is considered that the communal private open space for blocks F and G is acceptable given the context of a high density mixed use scheme, and given that relatively good access is provided to the space from the units that surround it (the duplex units open on to the space and other units are provided with easy access to it).

Landscaping

9.40 A landscape masterplan is shown in the submitted drawings and this is considered to be a good basis for the landscaping strategy for the site as a whole. However, various consultees including British Waterways, the Environment Agency, Design for London and Cabi have commented on the landscaping proposed, and at present there is no consensus on the approach followed. Therefore further details are required through submission of details pursuant to conditions.

Moorings

9.41 British Waterways and Environment Agency have also commented on the feasibility of providing moorings for house boats on the river adjacent to the development. However, these would be outside the application site boundary, so their suitability would need to be established through submission of a separate application. It is considered that British Waterways capacity as landowner would be a suitable mechanism for their objectives to be achieved on this, rather than it being an issue that is addressed through this planning application. Although in principle there is policy support for moorings, officers recognise that there are practical issues as set out in the EA response. Therefore this issue should be explored more fully at a later date through submission of a separate application.

Planning Obligations

9.42 Officers are in discussion with the applicants regarding the section 106, with

the intention of achieving an agreement that is in compliance with the LTGDC Planning Obligations Community Benefit Strategy. Where contributions have been requested by consultees as set out above, these would be considered in due course through the Lower Lea Valley Management Group as set out in the Strategy. A separate report will be prepared prior to the committee meeting setting out in full the scale of contributions and in kind benefits proposed when discussions are at a more advanced stage.

10 CONCLUSION AND REASONS FOR APPROVAL

- 10.1 This is the latest and largest in a series of mixed use applications along and around the High Street. The MOZ designation in the Newham UDP for the site is considered to be more significant than the OAPF which seeks a commercial led scheme on this prominent site.
- 10.2 Whilst it is high density there is a good range of uses and housing types proposed, especially family units, which can take advantage of the extensive frontage to the water with the landscaped approach to the Olympic park on the other side of the water.
- 10.3 Warton Road was always to be significantly widened and altered as part of the Stratford City development and further works are required for the Olympics. The scale and design of the development therefore needs to address both the High Street and the reconfigured Warton Road. Since the original proposals for the site a range of changes have been made to heights and design and also of importance is the retention of most of Warton House with a lightweight addition. The main issue is the design of the tower and whether reservation of materials and final detailing will be sufficient to deliver the quality of building required in this location
- 10.4 With regard to the Corporation's Planning Obligations Community Benefit Strategy an update will be provided at Committee but negotiations are advanced on a range of proposals, which it is hoped will accord with the main elements of that Strategy. A detailed financial appraisal has been assessed by the Corporation's consultant. Subject to the conclusion of a S106 agreement in line with the Strategy there would be no objection on this basis.

11 RECOMMENDATION

11.1 That the application be delegated to the Director of Planning to APPROVE subject to:

- (1) The completion of a S106 Agreement in accordance with the Corporation's Planning Obligations Community Benefit Strategy (and the Addendum Report on the section 106 discussions that will follow) and to secure provision of affordable housing at the level set out in this report**
- (2) any outcomes from the Mayor of London's Stage 2 report; and**
- (3) the conditions listed below.**

12 CONDITIONS AND REASONS

See separate document.

CASE OFFICER: Alice Leach

Appendix 1: Site Location Plan

Appendix 2: Proposed Site Layout Plan

Appendix 3: Proposed Elevations