

Land at Lennox Estate, Arabella Drive

Local Planning Authority: Wandsworth

Local Planning Authority reference: 2025/4170

Strategic planning application stage 1 referral

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

The proposal

Construction of 81 new affordable units (Use Class C3) across two buildings ranging from 6 to 14 storeys, incorporating ground floor community floorspace (Use Class E(d) and F2). Demolition of existing buildings, MUGA and structures and stopping up of part of Arabella Drive, provision of new and replacement open space and play space, landscape and public realm improvements including reorganisation of car parking and carriageway on Ludovick Walk.

The applicant

The applicant is **London Borough of Wandsworth** and the agent is **Tibbalds Planning**.

Strategic matters summary

Land use principles: The optimisation of public land to deliver affordable housing is strongly supported. The loss of some protected open space and MUGA, and relocation of community facility could be accepted on balance subject to demonstration of qualitative improvement and impact on groups with protected characteristic who use the site.

Affordable housing: The proposal delivers 81 affordable housing units (100% by habitable room), with a tenure split of 100 % low-cost rent. This is strongly supported subject to being secured within the S.106.

Urban Design: The layout and scale are appropriate for the current and emerging context and the design approach is supported. There is some less than substantial harm to nearby heritage assets and this should be addressed through a robust assessment of public benefits.

Transport: A reduction in replacement car parking should be explored; a Delivery and Servicing Plan, Construction Logistics Plan and Travel Plan should be secured by the Council.

Environment and sustainable infrastructure: Further information is required in relation to energy, whole life carbon, circular economy, flooding and sustainable drainage, urban greening and air quality.

Recommendation

That the Wandsworth Council be advised that the application does not yet fully comply with the London Plan for the reasons set out in this report. Outstanding matters relating to land use principles, transport, environment and sustainable infrastructure should be addressed.

Context

1. On 09 December 2025, the Mayor of London received documents from Wandsworth Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008, the Mayor must 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 issuing his response.
2. The application is referable under the following category of the Schedule to the Order 2008:
 - 1C(c): "Development which comprises or includes the erection of a building more than 30 metres high outside the City of London."
3. Once the Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or, allow the Council to determine it itself.
4. The Mayor of London's statement on this case will be made available on the GLA's public register: <https://planapps.london.gov.uk>

Site description

5. The application site is part of the Lennox Estate, Roehampton, in the London Borough of Wandsworth. The site itself is at the northern end of the estate and contains land that is designated as local open space, a Multi-Use Games Area (MUGA) and a community centre.
6. To the south of the estate is the Grade 2 listed Priory Hospital, with Barnes Common to the north east and Roehampton Sports Club and residential uses to the east.
7. The site is bound by the A205 Upper Richmond Road to the north, which forms part of the Transport for London Road Network (TLRN) and Beverley Brook to the west, which forms the boundary with the London Borough of Richmond.
8. The site has a PTAL of 3, on a scale of 0 to 6b where 6b is the highest.

Details of this proposal

9. The application proposes the construction of 81 new affordable units (Use Class C3) across two buildings ranging from 6 to 14 storeys, incorporating ground floor community floorspace (Use Class E(d) and F2). Demolition of existing buildings, MUGA and structures and stopping up of part of Arabella Drive, provision of new and replacement open space and play space, landscape and public realm improvements including reorganisation of car parking and carriageway on

Ludovick Walk. . These new homes form part of the ‘Homes for Wandsworth’ programme, which aims to maximise the delivery of affordable homes across the borough.

Strategic case history

10. The GLA hosted a pre-application meeting with the applicant team (also attended by the LPA) on 25 September 2024 in respect of proposal to redevelop this site for 88 new homes (100% affordable) with two buildings ranging from 6 to 15 storeys in height, stopping up of part of Arabella Drive and providing new landscaping and open space.

Strategic planning issues and relevant policies and guidance

11. For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area comprises the Wandsworth Local Plan 2023 – 2038 (July 2023); and the London Plan 2021.

12. The following are also relevant material considerations:

- The National Planning Policy Framework and National Planning Practice Guidance;
- Draft revised NPPF (December 2025)
- A Written Ministerial Statement regarding a package of targeted and temporary emergency support measures to drive up housebuilding in London was issued on the 23 October 2025 by the Secretary of State for Housing, Communities and Local Government. This was accompanied by a joint Policy Statement with the Mayor of London: "Homes for London: a package of support for Housebuilding in the Capital" available [here](#)¹. Draft LPG ‘Support for Housebuilding’ available [here](#)².
- Draft National Planning Policy Framework issued 16 December 2025 available [here](#)³.

13. Relevant strategic supplementary planning guidance (SPG) and London Plan Guidance (LPG), including on estate regeneration, affordable housing, urban design, transport, sustainability and the environment, which can be found on the GLA’s website [here](#).⁴

¹ <https://questions-statements.parliament.uk/written-statements/detail/2025-10-23/hcws991>

² <https://www.london.gov.uk/programmes-strategies/planning/implementing-london-plan/london-plan-guidance/support-housebuilding-lpg>

³ <https://www.gov.uk/government/consultations/national-planning-policy-framework-proposed-reforms-and-other-changes-to-the-planning-system>

⁴ <https://www.london.gov.uk/programmes-strategies/planning/implementing-london-plan/london-plan-guidance?ac-63512=63507>

Land use principles

14. The optimisation of public land to deliver affordable housing is strongly supported by the GLA. The scheme is led by the London Borough of Wandsworth as part of its ambition to provide up to 1,000 new social rented homes in the borough on land owned by the Council; the delivery of new affordable homes on this site will make a significant contribution towards the Homes for Wandsworth programme.
15. Whilst the proposal is part of an estate, it does not involve the redevelopment of existing homes, therefore the provisions of London Plan Policy H8 (loss of existing housing and estate regeneration) does not apply.
16. The site currently contains a community facility which comprises of 130 sq.m in size. A replacement community space measuring 237 sq.m is proposed within the new Block A 1 located in the central green space. The replacement of the community space is supported.
17. The existing facility is home to a boxing club. It is understood that the Council will facilitate a temporary location for the current occupier during construction and engage with community groups for the future occupation of the proposed space. The Council should assess the relocation of existing club including the future of the community space, and secure the proposed community use appropriately.
18. The open space on the site is currently protected within the Local Plan. This comprises a total of 4,878 sqm (including the MUGA) within the current boundary of protected open space as identified within the Local Plan. The proposal is for reconfiguration and expansion of the open space. The reconfiguration would result in the loss of approximately 437 sq.m. of open space within the current boundary.
19. Policy G4 of the London Plan states that that proposals should not result in a loss of protected open space. However, the proposal includes stopping up of part of Arabella Drive, creating additional open space of approximately 1,200 sq.m. Whilst there would be a small loss of open space within the current protected boundary, overall, the proposal would deliver an increase in usable open space of approximately 763 sq.m. (total of 5,641 sq.m.) alongside improvements to the remaining open space.
20. The proposal would result in reduction of sports pitches/facilities by virtue of redevelopment of the existing MUGA. Policy S5 of the London Plan seeks the retention of existing sports facilities unless an assessment has been undertaken showing the sports facilities to be surplus to requirements, the proposal includes an equivalent or better provision in terms of quantity and quality; or the development is for alternative sports and recreational provision the benefits of which clearly outweigh the loss of the current use.
21. The worn nature of the existing MUGA facility is acknowledged, and the qualitative improvements are welcomed; however, the current MUGA is being reduced in size from 840 sq.m to 542 sq.m and the Council should further assess whether this is limiting in the proposed sports provision compared to the existing use.

22. The proposed reduction in MUGA and redevelopment of the existing community space could have an impact on people with protected characteristics under the Equality Act. Therefore, the applicant should provide an Equality Assessment for officers to fully assess equality impacts.
23. In summary, the optimisation of public land to deliver affordable housing is strongly supported. The loss of some protected open space and MUGA, and relocation of community facility could be accepted on balance given that the proposal facilitates delivery of affordable homes and provides an increase in open space, subject to further assessment by the Council on the qualitative improvements and demonstration that the proposal would not unduly impact groups with protected characteristics who use the site.

Affordable housing

24. The application proposes to deliver 100% affordable housing units. As the scheme would deliver 100% affordable housing in a social rented tenure, viability testing is not required in line with London Plan Policy H5, and the scheme is eligible to follow the fast track route and would not be subject to early or late-stage viability reviews.
25. The proposed unit size mix has been developed in consultation with the Council's housing team and prioritises the types of units most in need within the overall context of achieving a balanced community with 19 units proposed as 3 and 4 bed units.

Urban design

Development layout and public realm

26. The proposed scheme presents a rational layout creating new and improved connections between the wider estate and Upper Richmond Road to the north while aiming to maximise the amount of open public space. This approach is supported.
27. The proposed residential block forms a successful edge to the northern boundary of the site and presents a positive street facing frontage onto Upper Richmond Road. The inclusion of individual front doors at ground level, with the ability to access directly onto the central open space to the south is welcomed. The provision of two shared entrances to cores at either end of the building is equally successful and helps to create legible and welcoming residential entrances.
28. The intention to support new legible pedestrian routes that connect the wider estate to Upper Richmond Road is welcomed, and the two blocks are broadly positioned to help enhance primary routes, as well as defining the play space to the west and open space to the east of the tower.
29. The emphasis placed on a strong landscaping strategy is strongly supported, as are the measures included for upgrading and enhancing open spaces across the wider estate.

30. The strategy for creating defined character areas, including the arrival space from the north and the treed area close to the brook, through a combination of built form and landscaping measures is strongly supported.

Scale, form and massing

31. The proposal includes buildings up to 14 storeys in height. This constitutes a tall building according to the borough's local plan which defines tall building as 21m. The site is not identified in the local plan as a site which is suitable for tall buildings. Accordingly, the proposals fail to meet the locational requirements of London Plan Policy D9 (Part B).

32. As per Policy D9(C), the development should satisfactorily address visual, functional, environmental and cumulative impacts.

33. With regards to the visual impacts, it is noted that the existing estate contains three tall buildings of 12 storeys in height and the proposed 14 storey building would be of a similar height on the estate and would not be entirely at odds with the local character.

34. The form, massing and height of the two blocks raise no specific strategic design issues, and there is clear potential to introduce a point block of similar height and character to the estate's existing point blocks.

35. The stepped profile of the tower creates a simple, elegant building form with a clear tripartite language across base, middle and top. In addition, the 6-storey block presents a scale and form that is consistent with the mid-rise blocks across the estate as well as introducing improved definition to Upper Richmond Road.

36. The submitted Townscape and Visual Impact Assessment (TVIA) demonstrates that the scale of the taller block does not raise any specific concern, and its visual impact would largely be limited to the estate and views looking east/west along Upper Richmond Road.

37. Overall, the form, massing and height of the two blocks raise no specific strategic design issues, and there is clear potential to introduce a point block of similar height and character to the estate's existing point blocks.

38. With regards to functional, environmental and cumulative impacts, it is noted that the applicant's technical information on these aspects will be assessed in detail by the Council and presented at the Mayor's decision making stage.

Residential quality

39. The use of deck access in the 6-storey block to enable 100% dual aspect units, and the proposed plan-form of the tower which also creates high levels of dual aspect, as well as good levels of outlook for residents is strongly supported.

40. It is noted that the western and southern ground floor frontages of the tower are dominated by inactive plant, refuse and cycle stores. The applicant is encouraged to continue to work closely with Council officers to achieve the best possible

design outcome, with the overarching objective being to align main entrances with key movement routes and ensure good levels of visibility/overlooking onto the children's play space.

Play Space

41. Play facilities have been provided which are able to be accessed by residents in the wider estate. The proposed play space goes significantly beyond the London Plan and Wandsworth policy requirements of 10sqm of play space per child with a total of approximately 1300 sq.m (approx 694 sq.m above requirements) as well as the provision of a replacement MUGA.

Architectural quality

42. The proposals for both buildings are supported in terms of pursuing simple and refined built forms with emphasis placed on the use of high-quality materials including pre-cast concrete and similar tones of brick.

43. The design team are encouraged to secure the material quality through the use of relevant conditions to achieve a high quality and robust development.

Fire safety

44. In line with Policy D12 of the London Plan the application is accompanied by a fire safety statement, prepared by a suitably qualified third party assessor, demonstrating how the development proposals would achieve the highest standards of fire safety, including details of construction methods and materials, means of escape, fire safety features and means of access for fire service personnel.

45. Further to the above, proposal meets the requirements of Policy D5 within the London Plan which seeks developments incorporate safe and dignified emergency evacuation for all building users. As a result, the fire safety statement complies with London Plan Policies D12 and D5 and all proposed measures should be secured by appropriate conditions. The submitted drawings confirm a second staircase is included within all buildings over 18 metres.

Inclusive design

46. An inclusive design section has been included in the Design and Access Statement (DAS) which identifies design and mitigation measures which should be secured to achieve an inclusive environment.

47. The application documents confirm that 10% of the dwellings would be designed to be accessible or adaptable for wheelchair users in accordance with London Plan Policy D7. The Council should secure M4(2) and M4(3) requirements by condition as part of any permission.

Heritage

48. London Plan Policy HC1 states that proposals affecting heritage assets and their settings should conserve their significance, avoid harm, and identify enhancement opportunities. The NPPF states that when considering the impact of the proposal on the significance of a heritage asset, great weight should be given to the asset's conservation and the more important the asset, the greater the weight should be.

49. The site is not in a conservation area and contains no designated heritage assets; however, it is in the setting of the following designated heritage assets:

- The Priory Hospital (including Ice House), listed Grade II
- Grove House, listed Grade II* and the associated Dummy Bridge, listed Grade II and Registered Park and Garden, Grade II

50. Based on the information submitted, GLA officers consider that due to the scale and form of the proposed 14 storey building, there would be a low level of less than substantial harm on the Grade II listed Priory Hospital caused by the appearance of the development in the backdrop, while as a result of the reduction in height the effect on Grove House and Garden is neutral.

51. As harm has been identified, the proposals do not comply with London Plan Policy HC1. However, in accordance with the provisions of the NPPF, the harm must be weighed against the public benefits. Officers consider that the proposed development would deliver public benefits, including the provision of affordable housing, which would have the potential to clearly and convincingly outweigh the harm to the assets identified above. A final balancing exercise will be undertaken at Stage 2 once the public benefits package is secured.

Transport

Healthy Streets

52. As identified in Policy T2 of the London Plan, all developments should seek to deliver improvements that support the Mayor's Healthy Streets approach. The Transport Assessment (TA) includes an Active Travel Zone (ATZ) Assessment of 5 routes at both daytime and night-time. The applicant has provided commentary on the worst sections of each route and has identified potential improvements.

53. The Council should consider securing contributions/works in kind to deliver improvements to support the 10 Healthy Street indicators and will further encourage active travel in line with London Plan Policy T2.

Public transport impacts

54. Due to the proposed stopping up of a section of Arabella Drive, the applicant has proposed for the rerouting of bus route 969 through the site along Ludovick Walk, this is accepted by TfL Bus Operations.
55. The applicant should confirm whether Ludovick Walk is a public highway or private road. If it is the latter TfL would require a lease agreement to allow buses to operate on this road.
56. Given the expected uplift in trip generation there would be no requirement for a contribution towards bus services.

Cycle Parking

57. A total of 150 cycle parking spaces are proposed, and the cycle parking quantum meets London Plan standards as set out in London Plan Policy T5 and London Cycling Design Standards (LCDS).

Car Parking

58. The applicant has proposed the provision of 8 new Blue Badge car parking bays, whilst this is in line with London Plan Policy T6.1, it is recommended that only provision for 3% is provided at the onset, which is equivalent to three spaces.
59. To align with strategic planning objectives and ensure efficient land use, the initial provision should be restricted to these three spaces. Any additional capacity should only be activated when a demonstrated demand arises. This requirement should be managed through a formal Parking Design and Management Plan, which should stipulate that further Blue Badge bays be delivered through the conversion of existing standard parking spaces as and when they are required by residents.
60. While the development is car free, 32 car parking bays lost in the stopping up if Arabella Drive are to be reprovided, in addition to the blue badge car parking. Given the quantum of existing parking and the sites inner London location and PTAL, there should be no more than a maximum of 20 car parking spaces including blue badge to accord with London Plan Policy T6.

Delivery and Servicing

61. The proposed servicing strategy is considered acceptable. In accordance with London Plan Policy T7, a full Delivery and Servicing Plan (DSP) should be secured.

Construction

62. The strategy should be agreed with LB Wandsworth as the highway authority in consultation with TfL. The full Construction Logistics Plan should be secured.

Travel Plan

63. A travel plan has been submitted for review. The travel plan should be provided in accordance with TfL Travel Planning Guidance. TfL will provide further commentary in the detailed comments.

Environment and sustainable infrastructure

Energy strategy

64. An energy statement has been submitted with the application. The energy statement does not yet comply with London Plan Policies SI2, SI3 and SI4. The applicant is required to further refine the energy strategy and submit further information to fully comply with London Plan requirements. Full details have been provided to the Council and applicant in a technical memo that should be responded to in full; however outstanding policy requirements include:

- Be Green – demonstration that renewable energy has been maximised, including full roof layouts showing the extent of PV provision;
- Be Seen – confirmation of compliance with this element of policy, with compliance to be secured within the S106 agreement;
- Energy infrastructure – further details on the design of the heat network is required, and the future connection must be secured by condition or obligation;
- Managing heat risk – further details to demonstrate the cooling hierarchy has been followed.

65. For the domestic element, the development is estimated to achieve a 63% reduction in CO2 emissions compared to 2021 Building Regulations. For the non-domestic element, a 36% reduction is expected.

66. The development falls short of the net zero-carbon target in Policy SI2, although it meets the minimum 35% reduction on site required by policy. As such, a carbon offset payment is required to be secured. This should be calculated based on a net-zero carbon target using the GLA's recommended carbon offset price (£95/tonne) or, where a local price has been set, the borough's carbon offset price. The draft s106 agreement should be submitted when available to evidence the agreement with the borough.

Whole life-cycle carbon

67. The applicant has submitted a whole life-cycle carbon assessment, as required by London Plan Policy SI2. The WLC assessment complies with London Plan Policy SI2.

68. A condition should be secured requiring the applicant to submit a post-construction assessment to report on the development's actual WLC emissions, suggested condition wording is available on the GLA [website](#)⁵.

Circular economy

69. The applicant has provided a Circular Economy Statement report however it references to the previous guidance and makes no reference to the completion of the GLA CE template; a revised statement should be submitted in line with the adopted London Plan Guidance: Circular Economy Statements (March 2022), including the completed CE template and/or an accompanying written report.

70. The applicant should ensure that the tables are completed in the GLA CE template, as in some areas, this lacks detail. The applicant has also reported against design principles which are outdated (based on October 2020 guidance), and should illustrate responses to those set out in the London Plan and associated guidance.

71. Additional information should be provided with respect to operational waste management at this stage.

72. A condition should be secured requiring the applicant to submit a post-construction report, suggested condition wording are available on the GLA [website](#)⁶.

Urban greening and biodiversity

73. The applicant has calculated the Urban Greening Factor (UGF) score of the proposed development as 0.791, which exceeds the target set by Policy G5 of the London Plan. The Council should secure all greening measures to ensure the specified target is met.

74. London Plan Fire Safety Guidance (2022) restricts the use of combustible materials in the external walls of a building, limiting the use of green walls. The proposed urban greening should therefore be reviewed against this guidance and updated as appropriate. Where this review finds it necessary to remove a green wall, opportunities should be sought to make up any reduction in the UGF score by improving the quality or quantity of greening across the wider masterplan.

75. The site adjoins the Beverley Brook in Wandsworth Site of Importance for Nature Conservation (SINC), the Beverley Brook from Richmond Park to the River Thames SINC, and the Bank of England Sports Club Grounds SINC, all of which are designated as being of Borough Importance. In accordance with Policy G6 of the London Plan the applicant should avoid impacts to the SINC and set out in the application how they will avoid direct or indirect impacts on the SINC. If avoidance of impacts is not possible the applicant should set out how they have

⁵ <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance/whole-life-cycle-carbon-assessments-guidance>

⁶ <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance/circular-economy-statement-guidance>

followed the mitigation hierarchy to minimise development impacts. This should be referred to the LPA to review in more detail.

76. The applicant has provided quantitative evidence that the proposed development secures a biodiversity net gain of 1.75 habitat units (equivalent to a net gain of 20.43%) and achieves no net loss in watercourse units. However, a shortfall of 0.02 watercourse units remains in relation to the mandatory 10% biodiversity net gain requirement. The applicant has confirmed that the trading rules have been satisfied.
77. It is acknowledged that the applicant seeks to satisfy the trading rules through offsite habitat compensation, either by the purchase of biodiversity units from an approved off-site provider or through local enhancements to Beverley Brook, to achieve a 10% biodiversity net gain for the project.
78. However, on-site biodiversity enhancements are preferable, and the applicant should seek to increase the biodiversity net gains on-site where possible, whilst following the mitigation hierarchy. This should be referred to the LPA to review in more detail.
79. The applicant should improve the Biodiversity Net Gain to at least the mandatory 10% for all BNG habitat units or higher if there are higher local targets.

Flood risk, sustainable drainage and water efficiency

80. GLA officers have reviewed the Flood Risk Assessment (FRA) in terms of pluvial (surface water), groundwater and sewer flood risk. The FRA adequately assesses the risk of flooding from pluvial and groundwater. When mitigation measures are considered, the residual flood risk to the site is low. The FRA does not assess the risk of flooding from sewers.
81. The sustainable urban drainage strategy generally does not comply with London Plan Policy SI13. Additional information as set out in the attached memo is required to demonstrate conformity.
82. The proposed development does not currently meet the requirements of London Plan Policy SI5 relating to water efficiency and consumption. Additional information is required regarding the targeted Wat 01 credits for the non-residential uses on site.

Air quality

83. The site does not fall within an Air Quality Focus Area. An Air Quality Neutral Assessment has been undertaken determining that the proposed development is air quality neutral. The development relies on Air Source Heat Pumps and therefore is considered air quality neutral in terms of building emissions and is "car-free" and is therefore considered air quality neutral in terms of transport emissions.
84. Discussion of NRMM has not been included in the assessment, including compliance with the NRMM Low Emission Zone. This should be included.

85. It is not clear if the development includes backup life-safety generators. The locations of flues for any life-safety diesel generators will need to be considered to avoid impacts during testing and maintenance at both existing and introduced receptors. A detailed assessment of emissions may be required where optimal flue locations are not achievable.

Local planning authority's position

86. Wandsworth Council planning officers are currently assessing the application. In due course the Council will formally consider the application at a planning committee meeting.

Legal considerations

87. Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged; or, direct the Council under Article 6 of the Order to refuse the application; or, issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application (and any connected application). There is no obligation at this 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.

Conclusion

88. London Plan policies on open space, affordable housing, design, transport and sustainability are relevant to this application. Whilst the proposal is supported in principle, the application does not fully comply with these policies, as summarised below:

- **Land Use Principles:** The optimisation of public land to deliver affordable housing is strongly supported. The loss of some protected open space and MUGA, and relocation of community facility could be accepted on balance subject to demonstration of qualitative improvement and impact on groups with protected characteristic who use the site.
- **Affordable housing:** The proposal delivers 81 affordable housing units (100% by habitable room), with a tenure split of 100 % low-cost rent. This is strongly supported subject to being secured within the S.106.
- **Urban Design:** The layout and scale are appropriate for the current and emerging context and the design approach is supported. There is some less than substantial harm to nearby heritage assets and this should be addressed through a robust assessment of public benefits.

- **Transport:** A reduction in replacement car parking should be explored; a Delivery and Servicing Plan, Construction Logistics Plan and Travel Plan should be secured by the Council.
- **Environment and sustainable infrastructure:** Further information is required in relation to energy, whole life carbon, circular economy, flooding and sustainable drainage, urban greening and air quality.

For further information, contact GLA Planning Unit (Development Management Team):

Donald Considine Strategic Planner (case officer)

email: donaldconsidine@london.gov.uk

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