



FRAME PROJECTS

London Legacy Development Corporation Quality Review Panel

Report of Planning Application Review: Pudding Mill Lane Design Code

Thursday 26 May 2022

Level 10, 5 Endeavour Square, London E20 1JN

Panel

Hari Phillips (chair)

Keith French

Attendees

Richard McFerran

LLDC Planning Policy and Decisions Team

Deborah Denner

Frame Projects

Adela Paparisto

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Apologies / report copied to

Anthony Hollingsworth

LLDC Planning Policy and Decisions Team

Catherine Smyth

LLDC Planning Policy and Decisions Team

Daniel Davies

LLDC Planning Policy and Decisions Team

James Bolt

London Borough of Newham

Ben Hull

London Borough of Newham

Cindy Reriti

Frame Projects

Note on process

The Quality Review Panel comments below follow on from a pre-application review of the Pudding Mill Lane design code. Panel members who attended the previous meetings were: Peter Studdert (chair); Teresa Borsuk; Jane Briginshaw; Jennette Emery-Wallis; and Barbara Kaucky.

1. Project name and site address

pudding Mill Lane: the land between City Mill River and Cook's Road, and between the DLR viaduct and Bow Back River

2. Presenting team

Alan Worn	Gort Scott
Migle Pikelyte	Jonathan Cook Landscape Architects
Tifenn Kergosien	London Legacy Development Corporation
Carla Smyth	London Legacy Development Corporation

3. Planning authority briefing

The Pudding Mill Lane masterplan proposes a new mixed-use neighbourhood, delivering approximately 948 new homes (45 percent affordable by habitable room, 51 percent family homes), together with a new local centre, employment space, retail and leisure uses, and public open space.

The outline application was submitted in December 2021 and is now a live planning application. The applicant is targeting presentation to the Planning Decisions Committee in July 2022.

The purpose of this planning application review is to reach a view on whether the design code and parameter plans meet the requirements of policy BN.5. Independent testing of the code has been commissioned by the Planning Policy and Decisions Team. The advisor appointed for this work commended the codes applicable to the taller building for being well-considered and detailed.

Planning officers asked for the panel's views on:

- The robustness of the design code to deliver the vision for the site area and achieve high quality design, particularly for tall buildings.
- The proposed height of the tall building in the emerging context and whether, with the refinements to the design guidance, it can meet the requirements of Policy BN.5 – noting that the scheme is in outline and will undergo detailed design scrutiny by an independent panel at the reserved matters phase.
- Whether there is appropriate design guidance to support the achievement of good daylight and sunlight in courtyard spaces – and whether these have been appropriately strengthened.
- Whether the design codes for public realm and landscape support the achievement of a rich and varied public realm and good quality play spaces.



4. Quality Review Panel's views

Summary

The Quality Review Panel finds much to admire in the masterplan for Pudding Mill Lane, and thinks the design code is well thought through, comprehensive and detailed. The panel encourages the applicant team to consider including a clause that tempers the constraints of the code, to allow for moments of surprise and joy, whilst protecting quality. At previous reviews it expressed concerns that the height of the central tower is not aligned to the vision in the Pudding Mill SPD, for a medium density mixed-use neighbourhood with a significant element of family housing. It recommended a reduction in the height of this 25 storey tall building. The panel understands that independent testing of the design code has been carried out. However, there was not sufficient information available to the panel to revise its previously stated view. For these reasons, it is not possible for the panel to assess fully at outline application stage, whether the requirements of policy BN.5 will be met. However, the design code is sufficiently detailed and coordinated with the parameters to give confidence that there is potential to achieve those criteria. The panel offered some detailed comments on the sections on outstanding design, layout, built form and appearance, and public realm.

General comments

- Pudding Mill Lane is characterised by its industrial past, and the City Mill and Bow Back Rivers. The panel would encourage more emphasis on the special place-specific qualities this could bring to the neighbourhood.
- Whilst the panel thinks the design code is a good comprehensive detailed document, it could be somewhat constrictive. It asks the applicant team to consider including a clause that tempers the constraints of the code, to allow for moments of surprise and joy, whilst protecting quality.

Outstanding Design

- Section 1 begins by stating that the aim is to achieve outstanding architecture. The panel thinks this should be expanded to include outstanding architecture and placemaking, to extend to the whole neighbourhood, including its public realm.
- Section 1.1.6 states that applicants must demonstrate that they have successfully delivered high quality architecture of a similar scale. The panel suggests that this should be high quality housing-led development of a similar scale.
- The statements about a best practice approach to participation and engagement are unclear. The panel recommends saying in accordance with the LLDC Code of Consultation.



- The panel would also encourage a requirement to involve a specialist in community engagement for each phase of the masterplan.
- 1.2.10 states that the majority of homes should be dual aspect. The panel does not think it would be acceptable for only 51% of homes to be dual aspect.
- It recommends saying that 100% of homes should be dual aspect, which still allows flexibility (because it is not a must) but is more robust.

Layout

- The panel thinks that Section 2 of the design code on layout is comprehensive and clearly set out.
- It welcomes the clarity of the street hierarchy described. It suggests that there should be a complementary section on junction hierarchy, with guidance on movement and character.
- There could be more emphasis on the need for an integrated approach to street design, including signage, street lighting and road marking, to minimise clutter.
- The panel supports the concept of play loops. It assumes these link to public transport nodes and nurseries.
- The sections and detailed plans of streets and spaces could indicate that services should go in roads, rather than in footpaths or multifunctional landscape areas.
- There is information about tree planting later in the document. The detailed layout drawings could also be used to set ambitions for the frequency of tree planting, and canopy cover desired in 5 or 50 years' time.
- Defining the character of tree planting that is sought would also be valuable, for example boulevard planting or clumps on corners.
- The requirement at 2.15.8 that corners of buildings should not be curved or radiused seems unnecessarily prescriptive.
- Figure 2.15.1 shows three buildings turning their backs on Marshgate Lane. Whilst the panel understands Pudding Mill Lane is seen as the primary pedestrian route, it does not agree that Marshgate Lane should be completely inactive.
- At 2.3.3 the description of tier 3 - main vehicular through-routes states that allowance must be made for higher-volume general traffic. The panel recommends a more nuanced description, to create people friendly streets able to accommodate traffic.



Built form and appearance

- The panel is generally supportive of the design code's guidance on built form and appearance.
- However, the panel previously expressed concerns that the tall buildings proposed by the masterplan bring town centre heights into the heart of the neighbourhood centre, and risk having a detrimental impact on Pudding Mill Square.
- It felt that the 25 storey tower (95 metre AOD), in particular, is not aligned to the vision in the Pudding Mill SPD, for a medium density mixed-use neighbourhood with a significant element of family housing.
- The panel understands that independent testing of the design code has been carried out. However, there was not sufficient information available to the panel to revise its previously stated view.
- Section 3.3 is primarily focused on the appearance of the central tower, and its relationship with the spaces around it. The panel recommends setting requirements for sustainability and the quality of homes, both of which could contribute to making this an exceptional building.
- By definition the nature of the outline application makes it difficult for the panel to give a view on whether the proposals meet the criteria set out in policy BN.5.
- At a detailed level, the panel suggests guidance on privacy of balconies, and designing in privacy in a way that reduces visual clutter.
- Further work is also needed to ensure ground floor privacy. 3.7.24 requires defensible space of no less than 1m, which seems very narrow. Examples with green ticks at 3.7.12 show ground floor windows with blinds and curtains drawn, and the panel questions whether these are good precedents?
- On another minor point, the panel notes that the design code includes guidance on edge treatments to private amenity terraces, but not boundaries between neighbouring terraces.
- 3.7.27 states that defensible spaces must incorporate the use of planting as a buffer. The panel notes planting may take time to become established, and will rely on maintenance, so may not provide privacy as envisaged.

Public realm

- The panel is broadly supportive of the design code's guidance on public realm.
- In particular, the panel applauds the approach to play provision set out in section 5.1.



- The panel understands that requirements for urban greening factor, biodiversity net gain, the ratio of hard to soft landscape, and other quantum are set out in the LLDC's development specification framework. It would be good to cross reference these important aspects in the design code.
- 5.2.8 mentions that soft landscape strategy must be designed in collaboration with a qualified ecologist. The panel recommends changing this wording to say in collaboration with a qualified landscape architect and an ecologist, to ensure high quality public realm.
- There will be situations where trees extend below highways. Section 5.2 should describe a requirement for structural soil cells to protect their roots, as this will be costly.
- 5.2.49 states that street trees should have a minimum girth of 12-14cm at the time of planting. The panel thinks this may be too small, and that 4.1m clear stem will be needed for vehicles to pass underneath.
- Similarly, 5.2.39 states that in riverside parks and paths trees should have a minimum girth of 12-14cm at the time of planting. The panel thinks trees of this size will be vulnerable, and the minimum size should be increased.

Next steps

The panel is broadly supportive of the Pudding Mill Lane design code, whilst suggesting some areas for potential refinement above.

It is not possible for the panel to assess fully at outline application stage, whether the requirements of policy BN.5 will be met. However, the design code is sufficiently detailed and coordinated with the parameters to give confidence that there is potential to achieve those criteria.

