

RELATIONSHIP BETWEEN ILLUSTRATIVE SCHEME AND FLOORSPACE PARAMETERS

- 1.1 This note has been prepared in response to a number of points raised by RBC in evidence (and rebuttal evidence – notably Mr Doyle in his Rebuttal Proof at paragraph 2.3.29 and his Figure 11) that the Illustrative Scheme could be further increased to fill the full extent of the Parameter Plan massing. This is not the case.
- 1.2 The format of the application is clearly set out in the submission documents and has been further clarified in the Appellant’s Rebuttal Evidence (prepared by CMS Cameron McKenna Nabarro Olswang LLP – See Section 4). This confirms that the following documents are submitted for approval:
- Parameter Plans (CD 1.34.10).
 - Amended Development Parameters Schedule (CD 1.34.9).
 - Design Code (CD 1.47).
- 1.3 Importantly, in the context of this note, the Amended Development Parameters Schedule – March 2022 (CD 1.34.9) sets out a number of floorspace parameters (paragraphs 2.1-2.5 and Table 1). For ease these are summarised below:
- Total Maximum floorspace shall not exceed 90,850 sq m (GEA).
 - Residential floorspace (Use Class C3) shall not exceed 80,000 sq m (GEA).
 - Minimum retail and leisure floorspace (Use Classes A1-A5, D1-D2) shall be 2,000 sq m (GEA).
- 1.4 In addition, the minimum and maximum floorspace by use, by plot and by total shall comply with Table 1 (replicated below). For comparison purposes, the figures shown in red relate to the Illustrative Scheme.

Use Class		Plot A	Plot B	Plot C	Plot D	Total GEA sqm (excluding plant)
C3 Residential units	Min	48,000				48,000
	Max	16,400	19,750	23,200	20,650	80,000
Illustrative Scheme		16,294	19,324	23,071		58,689
B1a Offices	Min	0	0	0	0	0
	Max	0	0	0	24,500	24,500
Illustrative Scheme					24,495	24,495
A1-A5, D1-D2 Retail units/ Community Facilities/ Gym	Min	2,000				2,000
	Max	7,000	7,000	7,000	7,000	7,000
Illustrative Scheme						3,818
Illustrative Scheme Total						87,002

- 1.5 The total floorspace area of the Illustrative Scheme as drawn is 87,002 sq m against a maximum floorspace cap of 90,850 sq m (i.e. 95.8% of the total) as set out on the Development Parameters Schedule. Further, the development shown within each plot has effectively been maximised.
- 1.6 The Illustrative Scheme cannot therefore be materially increased from that drawn without breaching the proposed floorspace cap. As a result, there is no feasible way to materially increase the volume of the Illustrative Scheme as drawn (albeit to some degree it might be possible to marginally amend the shape of some of the blocks).