

South Grove, Walthamstow**in the London Borough of Waltham Forest****planning application no. 160333FUL****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

A mixed use development involving demolition of existing buildings and construction of buildings ranging between 2 to 12 storeys, comprising 473 residential units and 154 sq.m. of commercial floorspace (Use Class A1, A2, A3, B1 and D1). Provision of associated car parking, cycle parking amenity space, energy centre, infrastructure works and landscaping.

The applicant

The applicant is **South Grove Regeneration Walthamstow Ltd**, the architect is **Pollard Thomas Edwards**, and the agent is **Savills**.

Strategic issues

The proposed residential-led development is supported in strategic planning terms; however issues with respect to **employment floorspace, housing, affordable housing, urban design and tall buildings, inclusive design, transport, and climate change** should be addressed before the application is referred back to the Mayor at his decision making stage.

Recommendation

That Waltham Forest Council be advised that the application does not yet comply with the London Plan for the reasons set out in paragraph 71 of this report; but that the possible remedies set out in that paragraph could address these deficiencies.

Context

1 On 2 March 2016, the Mayor of London received documents from Waltham Forest 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 has until 7 April 2016 to provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under Categories 1A, 1B(c) and 1C(c) of the Schedule to the Order 2008:

- 1A “Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats.”
- 1B(c) “Development (other than development which only comprises the provision of houses, flats, or houses and flats) which comprises or includes the erection of a building or buildings (c) outside Central London and with a total floorspace of more than 15,000 square metres.”
- 1C(c) “Development which comprises or includes the erection (c) a building of more than 30 metres high and outside the City of London.”

3 Once Waltham Forest 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 website www.london.gov.uk.

Site description

5 The 1.6 hectare site is bounded by South Grove to the south and east, a railway line to the north and Brunner Road to the west, with light industrial units beyond. The broadly triangular site currently comprises a 280 space surface car park, light industrial units, disused public toilets and the Alpha Business Centre, and is accessed from South Grove via Side Road or Brunner Road.

6 The site adjoining Brunner Road to the west is subject to a planning application for a mixed-use development comprising 183 residential units and 478 sq.m. of flexible retail space (LPA ref: 153337FUL, GLA ref: D&P/3397/01) in buildings of 4 to 8 storeys. The wider area is characterised predominantly by retail and commercial uses to the north, associated with the town centre, and residential use to the south. The area is generally low-rise.

7 The site falls within Walthamstow Town Centre, which is identified in the London Plan as a Major Town Centre, with the High Street situated to the north of the site beyond the railway line. The Walthamstow St. James Conservation Area lies 35 metres to the north, beyond the railway line.

8 The site is remote from the Transport for London Road Network (TLRN); however the nearest section of the Strategic Road Network (SRN) is Lea Bridge Road, located approximately 1.2km south of the site. St. James Street Station is located 250m north of the site and is served by London Overground services with direct trains to Walthamstow Central and Liverpool Street. Walthamstow Queens Road station is approximately 650m east of the site, also providing London Overground access to the Gospel Oak to Barking Line. Walthamstow Central is approximately 900m north-east of the site and is served by London Underground Victoria Line. Additionally, 9 bus routes are in proximity of the site, with the nearest bus stop located on South Grove, directly adjacent to the site. On that basis, the site has a very good public transport access level (PTAL) rating of 5, on a range of 1 to 6, where 6 is the highest.

Details of the proposal

9 Full planning permission is sought to demolish the existing buildings and construct a mixed use development of buildings ranging between 2 to 12 storeys, comprising 473 residential units (127 x 1 bed, 275 x 2 bed, 28 x 3 bed, 43 x studio) and 154 sq.m. of commercial floorspace (Use Class A1, A2, A3, B1 and D1).

10 Four linked mansion blocks of 2 to 9 storeys are proposed to the north of the site, beside the retained London Plane trees along the railway lines, with communal residential open space in between. A 'landmark' residential building of up to 12 storeys is proposed in the north-east corner of the site, with the flexible commercial space on the ground floor. Two perimeter blocks of 5 to 7 storeys are proposed to the south of the site along South Grove, with communal residential courtyards. The eastern perimeter block includes a 'flat-iron' building, in response to the shape of the site, rising to 8 storeys.

11 The proposals also include a new linear east-west public park, between the mansion blocks and the perimeter blocks, incorporating a pedestrian and cycle route. A total of 22 Blue Badge parking spaces are proposed, with 2 car club spaces.

Case history

12 Planning permission was granted in February 2014 (LPA ref: 2013/1252; GLA ref: D&P/3084) for:

- *"Demolition of the existing buildings and comprehensive mixed-use redevelopment comprising a supermarket (Class A1), non-food retail units (Class A1), flexible floorspace for Classes A1/A2/A3/D1, and 245 residential units (Class C3) in buildings of up to nine storeys; together with associated car and cycle parking, highway works, public realm, amenity space, landscaping, plant and servicing arrangements."*

13 However, the permission above was not implemented by the applicant, South Grove Regeneration Walthamstow Limited, which was formerly owned by the Morrisons supermarket group, who decided not to pursue a large supermarket on the site. Changes in the retail market and the evolving needs of occupiers has led the Council to change the allocation of the site from large format retail to residential development.

14 On 10 December 2015, a pre-application meeting was held at City Hall for full planning permission for a mixed use scheme comprising approximately 460 new residential dwellings and 150 sq.m. new A3 commercial floorspace in a series of new buildings ranging from four to twelve storeys in height, together with private and communal amenity space, cycle parking, disabled parking and associated public realm and landscaping.

15 The GLA's pre-application advice report of 4 January 2016 concluded that the principle of the proposal would be consistent with London Plan policies and was broadly supported in strategic and local planning policy terms; however issues relating to housing, affordable housing, urban design, inclusive design, sustainable development and transport should be addressed as part of any future planning application submission.

Strategic planning issues and relevant policies and guidance

16 The relevant issues and corresponding policies are as follows:

- Employment *London Plan*
- Housing *London Plan; Housing SPG; Housing Strategy; Shaping Neighbourhoods: Play and Informal Recreation SPG; Shaping Neighbourhoods: Character and Context SPG*
- Density *London Plan; Housing SPG*
- Affordable housing *London Plan; Housing SPG; draft interim Housing SPG; Housing Strategy*

- Urban design *London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG*
- Tall buildings *London Plan*
- Ambient noise *London Plan; the Mayor's Ambient Noise Strategy*
- Inclusive design *London Plan; Accessible London: achieving an inclusive environment SPG*
- Transport *London Plan; the Mayor's Transport Strategy*
- Parking *London Plan; the Mayor's Transport Strategy*
- Crossrail *London Plan; Mayoral Community Infrastructure Levy; Use of planning obligations in the funding of Crossrail and the Mayoral Community infrastructure levy SPG*
- Climate change *London Plan; Sustainable Design and Construction SPG; Mayor's Climate Change Adaptation Strategy; Mayor's Climate Change Mitigation and Energy Strategy; Mayor's Water Strategy*

17 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 Waltham Forest Core Strategy (2012), the Waltham Forest Local Plan Development Management Policies (2013), the Walthamstow Town Centre Area Action Plan (2014), and the 2016 London Plan (Consolidated with Alterations since 2011).

18 The following are also relevant material considerations:

- The National Planning Policy Framework and accompanying Planning Practice Guidance.
- The Upper Lee Valley Opportunity Area Planning Framework (July 2013).
- Walthamstow Town Centre Master Plan and Interim Planning Policy Framework (2011).
- The South Grove/St. James Supplementary Planning Document (2015).

Principle of development

19 London Plan Policy 3.3 recognises the pressing need for new homes in London and Table 3.1 of the London Plan 2015 gives an annual monitoring target of 862 new homes per year in Waltham Forest between 2015 and 2025. The site is located within Walthamstow Town Centre, and Policy 2.15 'Town Centres' supports housing growth through intensification and selective expansion in appropriate locations.

20 The Walthamstow Town Centre Area Action Plan (2014) originally identified the site for a retail-led, mixed-use development, including residential uses, as per the unimplemented planning permission referred to above for a supermarket-led, mixed-use development. However, in light of increased housing targets in the borough, a move away from large-format retail stores, and a shift of focus towards more sustainable modes of travel that do not support large edge of centre supermarkets, the Council revisited its aspirations for the site and adopted the South Grove/St. James SPD in September 2015, which identifies the site as suitable for residential-led mixed-use, rather than retail-led, development.

21 The principle of a mixed-use redevelopment on the site, including residential, has been established through the previous planning consent. The proposed residential-led, mixed-use intensification of this town centre site would be consistent with London Plan policies and is supported.

Loss of employment floorspace

22 The site currently includes 5,022 sq.m. of commercial space comprising 1,926 sq.m. of B2 light industrial/warehouse space on Brunner Road, which the applicant states is largely vacant, and 3,096 sq.m. of B1 office space in the Alpha Business Centre.

23 The application includes 154 sq.m. of flexible commercial floorspace (Use Class A1, A2, A3, B1 and D1) on the ground floor of the landmark building at the north-east corner of the site.

24 The site is located in the Upper Lee Valley Opportunity Area, which has an indicative employment capacity of 15,000. London Plan Policy 4.4 'Managing Industrial Land and Premises' provides a strategic aim for boroughs to adopt a rigorous approach to industrial land management, but recognises that managed release may be required to provide other uses in appropriate locations. Policy 4.1 'Developing London's Economy' provides strategic support for the provision of employment floorspace. The site is not identified as Strategic Industrial Land (SIL) or as locally significant industrial land and it is identified in the Area Action Plan and the South Grove/St. James SPD for mixed uses, including residential.

25 The proposal will involve a reduction in commercial floorspace of almost 5,000 sq.m. The applicant calculates that the existing floorspace could provide a maximum of 292 full-time equivalent jobs, to be replaced by 55 full-time equivalent construction jobs and 7 on-site full-time equivalent jobs in the completed development. However, it is recognised that much of the existing space is of poor quality and vacant. In light of this, together with the Council's aspirations for the site for residential uses, the loss of the existing space through the previous permission, and the lack of any employment protections for the site, the loss of this space is considered acceptable and is therefore supported. However, the applicant should provide further detail on the businesses affected by the redevelopment and how they will be relocated.

Housing

26 The breakdown of residential units is as follows:

	Market	Intermediate (shared ownership)	Affordable rent	Total	%
Studio	35	8	0	43	9%
One	103	8	16	127	27%
Two	225	15	35	275	58%
Three	13	0	15	28	6%
Total	376	31	66	473	
%	79.5%	6.5%	14%		

Affordable housing

27 London Plan Policy 3.9 'Mixed and Balanced Communities' seeks to promote mixed and balanced communities by tenure and household income. Policy 3.12 'Negotiating Affordable Housing' seeks to secure the maximum reasonable amount of affordable housing. The Council aims to provide 50% of new housing as affordable.

28 The proposals include affordable housing made up of shared ownership (6.5%), and affordable rent (14%) to be managed by an unidentified Registered Provider, amounting to

20.5% by unit (or 25% by habitable room), with 79.5% market housing. The affordable tenures are located in the eastern perimeter block and flat-iron building and are tenure blind. The inclusion of affordable and market housing on the same site is strongly supported in accordance with Policy 3.9. As required by London Plan Policy 3.12, the applicant has submitted a financial viability assessment. The Council should provide GLA officers with their independent assessment of viability prior to the referral of any Stage Two application, in order to confirm that the proposal will provide the maximum reasonable amount of affordable housing, in accordance with London Plan Policy 3.12. GLA officers will update the Mayor of the findings of the assessment, and of any further negotiations, at the Stage Two decision making process.

29 The current split of affordable rent and intermediate units is close to the 60%:40% strategic requirement stated in London Plan Policy 3.11 'Affordable Housing Targets', and is supported, subject to the outcome of viability review.

Housing choice

30 The proposed mix of unit sizes is set out above. London Plan Policy 3.8 'Housing Choice' encourages a choice of housing based on local needs, while affordable family housing is stated as a strategic priority. Overall, only 6% of the units are family-sized, which the London Plan states are generally three-bed units or larger; however it is recognised that one and two-bed units are more suited to town centre locations such as this, and also that 23% of the affordable rent units are family sized. A relatively high proportion of market and intermediate units are studios; however it is recognised that this assists with the affordability of these units as a first step on the property ladder. The choice of units is acceptable, subject to confirmation from the applicant that the affordable rent units meet the needs of the Registered Provider, and confirmation from the Council that the overall choice of units meets local housing needs.

Density

31 London Plan Policy 3.4 'Optimising Housing Potential' states that taking into account local context and character, the design principles in Chapter 7 and public transport capacity, development should optimise housing output within the relevant density range shown in Table 3.2. The site is considered to be within a 'central' setting, where the density matrix sets a guideline of 650-1,100 habitable rooms (or 140-405 units) per hectare with a PTAL of 4-6.

32 The density proposed is 299 units (or 828 habitable rooms) per hectare, which falls comfortably within the suggested ranges in the London Plan and is therefore considered acceptable.

Residential quality

33 London Plan Policy 3.5 'Quality and Design of Housing Developments' promotes quality in new housing provision, with further guidance provided in the Housing SPG.

34 All units meet or exceed the London Plan space standards. The high number of vertical circulation cores results in the number of units sharing the same landing being below the maximum eight units per core as identified in Standard 3.2.1 of the Mayor's Housing SPG and a high proportion (69%) of dual aspect flats. Concerns were raised at pre-application stage about single aspect north-facing units in some blocks; however these have now been removed. In the western perimeter block, external deck access on the courtyard side allows dual aspect to units that would otherwise be single aspect north-facing. As detailed in the Housing SPG, this is acceptable; however detailed design should ensure that privacy of these units is maintained.

35 The layout of the units generally provides good daylight and sunlight conditions, with 87% of units achieving the required Average Daylight Factor level. Some units in the eastern perimeter block perform less well, largely due to the triangular-shaped courtyard, necessitated by the shape of the site. The applicant should confirm that floor to ceiling heights achieve at least 2.5 metres. Ceiling heights can positively impact on how spacious, light and ventilated a dwelling is and a greater ceiling height than that set out in nationally described standards is strongly encouraged in London, and particularly on relatively high density schemes such as this. As discussed under 'Climate change' below, further measures should be considered to reduce the risk of overheating.

36 A Noise and Vibration Assessment is submitted in support of the application. The main noise sources which could affect the proposals are railway noise for the blocks to the north and road traffic for the blocks facing South Grove. Mitigation measures are therefore proposed, including double glazing and acoustic trickle vents as standard, as well as enhanced ventilation systems in specific parts of the site, which should be secured appropriately. Retention of semi-mature trees along the north and south boundaries will also help to mitigate these impacts.

Children's play space

37 Policy 3.6 of the London Plan seeks to ensure that development proposals include suitable provision for play and recreation. Further detail is provided in the Mayor's supplementary planning guidance 'Shaping Neighbourhoods: Play and Informal Recreation', which sets a benchmark of 10 sq.m. of useable child play space to be provided per child, with under-5 child play space provided on-site as a minimum.

38 The breakdown of residential units gives a child yield of 99, requiring 990 sq.m. of play space; with 53 under-fives, requiring 530 sq.m. of play space as a minimum. The proposals indicate that 871 sq.m. of play space will be provided within the new linear park and the residents' communal gardens within the perimeter blocks, including 530 sq.m. for under-fives. This includes a communal natural play garden between two of the mansion blocks and doorstep play within the perimeter block courtyards. Play space for over-twelves is available within 800 metres of the site, including the Douglas Eyre Sorts Centre MUGA, the Low Hall Sports Grounds, St. James Park and Lee Valley Park. The proposals are acceptable in line with Policy 3.6.

Urban design and tall buildings

39 Overall, the scheme is well considered, broadly reflects the design aspirations of the South Grove/St. James SPD, and responds well to comments made at pre-application stage. The proposals would deliver a significant part of the key east-west pedestrian/cycle route through the site identified in the SPD, with the added benefit of the proposed linear park. The park incorporates a variety of spaces for various uses and the Landscape Design Statement indicates that the park will be of a high design quality, the maintenance of which should be appropriately secured. The applicant should provide further detail on the use and landscaping for the parcel of land within the north-west corner of the site, which is not detailed within the application documents.

40 All of the mature trees along the boundary of the site with the railway lines will be maintained, which will help to mitigate railway noise impacts. Most of the street trees along South Grove will be retained, which will help to mitigate road noise impacts and provide shading on this south-facing aspect. A significant number of new trees will be introduced to the site.

41 The four mansion blocks along the north of the linear park are linked by a double height colonnade, which includes 15 duplex units with direct access onto the park, as well as the

entrances to the mansion blocks via communal gardens in between each block. This provides a consistent and high quality street frontage, with good levels of activity and over-looking, ensuring it feels safe and will be well used. Similarly, access points to the perimeter blocks to the south are well-dispersed on all surrounding streets, with direct access from the street to ground floor units. A retail unit at the 'piazza' on the corner of South Grove and the new linear park, alongside residential access, will provide good levels of activity on this prominent corner.

42 The form and massing strategy is supported, providing a strong building edge to the railway line and South Grove in accordance with the principles in the SPD. London Plan Policy 7.7 'Location and Design of Tall and Large Buildings' sets out a range of criteria for tall buildings. The intention to create two taller buildings (the 'landmark' building and the 'grid iron' building) at the key arrival point on the north-east corner will contribute to local legibility and is supported. The appearance of these buildings is also distinguished by two types of brick tile cladding, in contrast to the brick used across the rest of the site, which reflects the residential character of the scheme and surrounding context. In order to ensure the quality of the scheme, the Council should consider securing retention of the architect through to completion.

Inclusive design

43 The aim of London Plan Policy 7.2 'An Inclusive Environment' is to ensure that proposals achieve the highest standards of accessibility and inclusion (not just the minimum). Inclusive design principles, if embedded into the development and design process from the outset, help to ensure that all, including older people, disabled and Deaf people, children and young people, can use the places and spaces proposed comfortably, safely and with dignity.

44 The proposed linear park route through the centre of the site will be used by some vehicles to service the site, as well as providing one-way access to the car parking on Side Road. The applicant should provide further detailed information illustrating the extent of the design features that will be incorporated to ensure that these shared spaces are safe and usable for disabled people.

45 Policy 3.8 'Housing Choice' requires that ninety percent of new housing meets Building Regulation requirement M4(2) 'accessible and adaptable dwellings' and ten per cent of new housing meets Building Regulation requirement M4(3) 'wheelchair user dwellings', that is, designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users. The application confirms that all of the units have been designed to meet Building Regulation requirement M4(2) and 10% will meet Building Regulation M4(3), which are spread across units sizes and includes affordable and market tenures. The Council should secure M4(2) and M4(3) requirements by condition. The future marketing of the wheelchair accessible homes should ensure that prospective purchasers are aware of the accessibility and adaptability of these units. Specific marketing to the disability community and to older people's organisations can help to ensure that the people who will benefit from the units accessible design are made aware of their existence.

46 As discussed under 'Transport' below, the applicant should explore the feasibility of increasing Blue Badge parking. A car parking management plan may be required to identify how these spaces will be allocated to residents of the wheelchair accessible units across all tenures and should include a mechanism to ensure that the supply and demand of the Blue Badge bays are regularly monitored and provision reviewed. This is to ensure that provision equates to the demand from disabled residents that the bays are effectively enforced.

Transport

47 The applicant proposes a car-free scheme, with the exception of 16 Blue Badge bays (3.4% of total units), along the central spine of the development, with a further 6 bays proposed along Brunner Road (although the Council will not count these spaces as part of the South Grove provision). The car-free nature of the scheme is welcomed; however, in line with the Housing SPG, the applicant should explore the feasibility of increasing the Blue Badge parking to provide spaces for 10% (47 spaces) of the residential units, as well as providing at least one for the commercial aspect. The restriction on residents applying for parking permits within any controlled parking zones is also supported.

48 The application should clarify the number of cycle parking space as the application documents give varying figures. In order to accord with London Plan standards, at least 794 spaces should be provided. The applicant should also confirm that all parking accords with the guidelines contained within Chapter 8 of the London Cycle Design Standards. A plan showing the location of short-stay cycle parking within public areas of development should be provided. The safe provision of cycling along the highway via segregated cycling facilities is supported, in order to ensure the development is fully connected to the Mini-Holland and wider Mayor's Vision for Cycling.

49 The applicant has utilised a previous pedestrian environment review system (PERS) audit undertaken for a recent adjacent application. The overall score for the access around the site achieved a good rating; however, the audit notes that footways are narrow, in some places to 1 metre. The applicant should clarify the minimum width of the footway around the site and if necessary discuss with the Council the feasibility of increasing the width of the footways to a minimum of 2 metres.

50 The applicant has provided a multi-modal trip impact assessment. Considering the nature, location and scale of the proposals, there will not be any significant impact on the highway network. A bus impact assessment has also been provided, and it is considered that the development will not require additional bus capacity; however, any improvements to the local environment must ensure the retention and/or enhancement of existing bus stops and stands, both during the construction and operational phase of the development.

51 TfL has commissioned a feasibility study to investigate an integrated step-free access solution for Walthamstow Central which currently operates at full capacity during the AM peak. Therefore, TfL welcomes further dialogue with the Council on the allocation of CIL funding towards the delivery of step free access and additional capacity required to accommodate the cumulative increase in trips from development within the local area in accordance with London Plan Policy 6.1, as improvement to the station will directly benefits those sites.

52 A Delivery and Servicing Plan (DSP) has been provided with all servicing needs proposed to take place within the development. It also seeks to minimise impacts on the highway network through site management/concierge. The final document should be secured by condition. The Construction Traffic Management Plan is welcomed, together with consideration of safe access/egress to/from the site by various vehicle types, including abnormal loads. The Travel Plan is considered acceptable and the final document should be secured within the section 106 agreement.

Community infrastructure levy

53 The Mayor has introduced a London-wide community infrastructure levy (CIL) to help implement the London Plan, particularly Policies 6.5 and 8.3. The rate for Waltham Forest is

£20 per square metre. The required CIL should be confirmed by the applicant and Council once the components of the development have been finalised.

Climate change

Energy

54 A range of passive design features and demand reduction measures are proposed to reduce the carbon emissions of the proposed development. Both air permeability and heat loss parameters will be improved beyond the minimum backstop values required by building regulations. Other features include low energy lighting fittings throughout the buildings and mechanical ventilation heat recovery (MVHR) units for the commercial and domestic elements.

55 The applicant has provided an Overheating Assessment based on the SAP methodology. The demand for cooling will be minimised through the incorporation of high performance glazing, which will allow adequate daylight penetration, while at the same time limiting excessive solar gains. Moreover, the MVHR units proposed will assist in achieving adequate ventilation levels. Where possible, windows will be operable in all domestic areas to achieve passive cooling, through single-sided or cross ventilation.

56 The SAP assessment shows that a significant number of units are predicted to be at medium risk of overheating. Further passive measures should be considered in line with Policy 5.9 'Overheating and Cooling' to avoid the risk of overheating, both now and in the future. Part L compliance data sheets for the sample dwellings should be provided to demonstrate that there is only a slight risk of high summer temperatures. Dynamic overheating modelling in line with CIBSE Guidance TM52 and TM49 is recommended. The applicant should also describe any likely restrictions that could limit the potential for natural ventilation (e.g. likely noise or local air quality issues, security issues or single aspect dwellings) and explain how these constraints are planned to be mitigated.

57 Based on the information provided, the development is estimated to achieve a reduction of 59 tonnes per annum (10.4%) in regulated CO₂ emissions from the first stage of the energy hierarchy ('Be Lean'), compared to a 2013 Building Regulations compliant development. Sample SAP calculation worksheets (both DER and TER sheets) and BRUKL sheets, including efficiency measures alone, have been provided to support the savings claimed.

58 The applicant has identified that there is one proposed district heating network (Lee Valley Heat Network) within the vicinity of the development and has confirmed that there are no immediate plans to implement the network within the next ten years and therefore a connection to the network is not being proposed at this time. The applicant has, however, provided a commitment to ensure that the development is designed to allow future connection to a district heating network should one become available.

59 As discussed at pre-application stage, and in accordance with London Plan Policy 5.6 'Decentralised Energy', the applicant should undertake investigations into the potential to develop a heat network that is integrated with the adjoining residential development on the Brunner Road site to the west. Further information on the research of this option is required.

60 A site heat network is proposed; however, the applicant should confirm that all apartments and non-domestic building uses will be connected to the site heat network. A drawing showing the route of the heat network linking all buildings on the site should be provided. The floor area and location of the energy centre should be provided.

61 The applicant is proposing to install a 50 kWe gas fired CHP unit as the lead heat source for the site heat network, which is sized to provide the domestic hot water load only. However, the CHP unit is considered to be running less than the adequate number of hours to ensure financial viability; and the applicant is therefore required to revisit the size of the CHP engine in order to guarantee its optimal performance. The number of running hours as well as the proportion of heat supplied by the CHP should be reviewed.

62 A reduction in regulated CO2 emissions of 136 tonnes per annum (23.9%) will be achieved through this second part of the energy hierarchy ('Be Clean').

63 The applicant has investigated the feasibility of a range of renewable energy technologies and is proposing to install 110 sq.m. of photovoltaic (PV) panels on the residential areas and air source heat pump (ASHP) systems on the commercial units. The PV panels are of 15% efficiency and are expected to have a rated output of circa 15.68 kWp. An indicative roof layout has been provided demonstrating that there is sufficient space to accommodate the proposed PV array. The applicant is considering ASHP systems to supply the heating and cooling load for the non-domestic units. A reduction in regulated CO2 emissions of 7 tonnes per annum (1.2%) will be achieved through this third element of the energy hierarchy ('Be Green').

64 Based on the energy assessment submitted, a reduction of 202 tonnes of CO2 per year in regulated emissions is expected, compared to a 2013 Building Regulations compliant development, equivalent to an overall saving of 35.5%. The carbon dioxide savings therefore exceed the target set within Policy 5.2 of the London Plan; however, the comments above should be addressed before compliance with London Plan energy policy can be verified.

Climate change adaptation

65 The applicant's Flood Risk Assessment (FRA) confirms that the site is within Flood Zone 1 and has no significant indication of modelled surface water flood risk. The FRA notes that there is a significant risk of surface water flooding where South Grove passes under the railway line, but that in the event of flooding at that location, access would still be available via Brunner Road. The proposals are therefore acceptable in terms of London Plan Policy 5:12 'Flood Risk Management'.

66 There are wider surface water flood risks within the local catchment area to which drainage from this site will contribute, therefore the application of London Plan Policy 5:13 'Sustainable Drainage' will be important. The FRA states that the development will be designed to reduce surface water discharge by at least 50%; however, the analysis used has taken 100 year 15 minute storm durations. These have the effect of giving high discharge rates and hence a 50% reduction on these rates to 111l/s remains high, given the size of the site is only 1.6ha. Such a site should be expected to discharge in the range of 10-20l/s following the application of suitable SuDS measures. The applicant should use the recommended 100 year 6 hour storm in its calculations.

67 Furthermore, whilst the FRA discusses the possibility of infiltration SuDS techniques, there is no commitment to these; however pre-application advice stated that there are several SuDS opportunities available for the site to attain greenfield run-off rates. There is scope for a joint SuDS solution with the adjacent development site on Brunner Road that would save both applications space and cost, and the applicant for that site has also been advised of this possibility. The applicant should re-consider the approach to sustainable drainage and provide a more clearly defined solution that achieves a greenfield run-off rate. The application is not currently compliant with London Plan Policy 5:13.

Local planning authority's position

68 The Council's position is not yet known.

Legal considerations

69 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 present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

Financial considerations

70 There are no financial considerations at this stage.

Conclusion

71 London Plan policies on employment floorspace, housing, affordable housing, urban design and tall buildings, inclusive design, transport and climate change are relevant to this application. The application complies with some of these policies but not with others, for the following reasons:

- **Employment floorspace:** The loss of the existing employment floorspace and the re-provision of an element of floorspace is supported. The applicant should provide further detail on the businesses affected by the redevelopment and how they will be relocated.
- **Housing:** The provision of 473 residential units is supported. The choice of units is acceptable, subject to confirmation that the affordable rent units meet the needs of the Registered Provider, and the overall choice of units meets local housing needs. The density of the scheme is within the London Plan density range. Residential quality is generally high; however the applicant should confirm that floor to ceiling heights achieve at least 2.5 metres. Children's play space proposals are acceptable.
- **Affordable housing:** The Council should provide their independent assessment of viability, in order to confirm that the proposal will provide the maximum reasonable amount of affordable housing.
- **Urban design and tall buildings:** The scheme is well considered and broadly reflects the design aspirations of the South Grove/St. James SPD. The applicant should provide further detail on the use and landscaping for the parcel of land within the north-west corner of the site.
- **Inclusive design:** The applicant should provide further detailed information illustrating the extent of the design features that will be incorporated to ensure that shared spaces are safe and usable for disabled people. The Council should secure M4(2) and M4(3) requirements by condition.

- **Transport:** The applicant should explore the feasibility of increasing Blue Badge parking and a car parking management plan may be required. The application should clarify the number of cycle parking spaces and confirm that all parking accords with the guidelines contained within Chapter 8 of the London Cycle Design Standards. The location of short-stay cycle parking within the public areas of development and the width of footways should be clarified. Existing bus stops and stands must be retained and/or enhanced, both during the construction and operational phase of the development. The final Delivery and Servicing Plan should be secured by condition. The final Travel Plan should be secured within the section 106 agreement.
- **Climate change:** The carbon dioxide savings exceed the target set within Policy 5.2 of the London Plan; however further information is required on the risk of overheating; the potential to develop a heat network integrated with the adjoining residential development; the route of the heat network; the floor area and location of the energy centre; and the size of the CHP engine. The application is not currently compliant with London Plan Policy 5:13 and the applicant should re-consider the approach to sustainable drainage and provide a more clearly defined solution that achieves a greenfield run-off rate.

72 On balance, the application does not yet comply with the London Plan; however the possible remedies set out above could address these deficiencies.

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