

20 January 2016

Sainsbury's, 55 Roden Street, Ilford

in the London Borough of Redbridge

planning application no. 4499/15

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

Demolition of existing buildings and structures and development of a replacement Sainsbury's store (Use Class A1) of 4,745 sq.m (net sales area), 951 sq.m (GIA) of flexible commercial floor space (Use Class A1/A2/A3/B1/D1) and 683 residential units (Use Class C3) arranged in nine blocks (up to 29 storeys) including two terraces of mews and town houses. An energy centre and plant is provided at basement and lower ground level, along with 410 retail car parking spaces and 42 residential car parking spaces. Associated highways and landscaping works. **(FULL APPLICATION)**

The applicant

The applicant is **Sainsbury's Supermarkets Ltd** and the architect is **UNIT Architects**.

Strategic issues

The key strategic issues in this case are **principle of development, town centre regeneration, retail, housing, urban design, inclusive design, sustainable development and transport**.

Recommendation

That Redbridge Council be advised that whilst the principle of the proposal is strongly supported, the application does not comply with the London Plan, for the reasons set out in paragraph 82 of this report; but that the possible remedies set out could address these deficiencies.

Context

1 On 3 December 2015 the Mayor of London received documents from Redbridge 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 6 January 2016 (extended to 20 January 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, 1C and 3F 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: 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: Development which comprises or includes the erection of a building in respect of which one or more of the following conditions is met: a) the building is more than 30 metres high and is outside the City of London.
- 3F: Development for a use, other than residential use, which includes the provision of more than 200 car parking spaces in connection with that use.

3 Once London Borough of Redbridge 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 proposal relates to an existing Sainsbury's supermarket in Ilford Metropolitan Town Centre, a two-storey supermarket and car park approximately 250m south of Ilford railway station. The site is bounded by properties along Audrey Road to the south, Roden Street to the North, Riverdene Road to the west and Winston Way to the east. Winston Way and Chapel Road are part of the Strategic Road Network and the nearest part of the Transport for London Road Network (TLRN) is the A406, North Circular Road, located approximately 300m west of the site.

6 The nearest bus stop to the site is located to the north of the existing Sainsbury's store on the A118 Winston Way from which there are 3 bus services operating. There are a further 19 bus services operating from bus stands within reasonable walking distance. Consequently, the site benefits from an 'excellent' public transport accessibility level (PTAL) of 6a. With the arrival of Crossrail in 2018-2019 at Ilford, fast train connections and accessibility will improve significantly further.

7 The site is within the Ilford Opportunity Area which is identified for a minimum of 5,000 new homes and 800 new jobs over the London Plan period to 2036. The site also falls within the Ilford Town Centre Area Action Plan (AAP) boundary and within the Ilford Town Centre Housing Zone, for which the Mayor has pledged financial support to assist in the delivery of 2,189 new homes.

Details of the proposal

8 The proposed development will comprise of the demolition of the existing Sainsbury's store (Class A1) of 2,657 sq.m (net sales area) and decked car park and it's replacement with a larger Sainsbury's store (Class A1) of 4,745 sq.m (net sales area), 951 sq.m (GIA) of flexible commercial floor space (Use Class A1/A2/A3/B1/D1) and 683 residential units (Use Class C3) arranged in nine blocks (up to 29 storeys), including two terraces of mews and town houses. An energy centre and ancillary plant is provided at basement and lower ground level, along with 410 retail car parking spaces and 42 residential car parking spaces. The development also includes associated highway and landscaping works.

Case history

9 On 8 September 2015 a GLA pre-application meeting was held at City Hall to discuss this scheme. The advice issued on 22 September 2015 stated that GLA officers broadly supported the redevelopment of the site for retail and housing uses, in accordance with the aspirations of the London Plan, the Opportunity Area, as well as the Housing Zone status and forthcoming Crossrail.

10 The applicant was advised to address issues regarding aspects of design and residential quality raised at the meeting. The applicant was also advised to ensure that other issues with respect to affordable housing, access, transport, flooding and sustainability were appropriately addressed by the planning submission.

Strategic planning issues and relevant policies and guidance

11 The relevant issues and corresponding policies are as follows:

- | | |
|---------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| • Retail/Town Centres | <i>London Plan; Town Centres SPG</i> |
| • Housing | <i>London Plan; Housing SPG; Housing Strategy; draft Interim Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG; Shaping Neighbourhoods: Character and Context SPG</i> |
| • Affordable housing | <i>London Plan; Housing SPG; Housing Strategy; draft Interim Housing SPG</i> |
| • Density | <i>London Plan; Housing SPG; draft Interim Housing SPG;</i> |
| • Urban design | <i>London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG</i> |
| • Tall buildings/views | <i>London Plan;</i> |
| • Inclusive Access | <i>London Plan; Accessible London: achieving an inclusive environment SPG;</i> |
| • Sustainable development | <i>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</i> |
| • Transport and Parking | <i>London Plan; the Mayor's Transport Strategy;</i> |
| • Crossrail | <i>London Plan; Mayoral Community Infrastructure Levy</i> |

12 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area are Redbridge Council's Core Strategy Development Plan Document (March 2008), the Borough Wide Primary Policies Development Plan Document (May 2008), the Development Opportunity Sites Development Plan Document (May 2008), Ilford Town Centre Area Action Plan (May 2008), and the 2015 London Plan (consolidated with Alterations since 2011).

13 The following are also relevant material considerations:

- Minor Alterations to the London Plan: Housing Standards and Parking Standards (Draft 2015)
- The National Planning Policy Framework, Technical Guide to the National Planning Policy Framework and National Planning Practice Guidance.

Principle of development – town centre regeneration and retail

14 The site is within Ilford Town Centre, identified in the London Plan as a ‘Metropolitan Town Centre’. London Plan Policies 2.15, 4.7 and 4.8 promote new commercial, leisure and housing uses in these locations. London Plan Policy 3.3 seeks to increase London’s supply of housing and in doing so sets borough housing targets, of which Redbridge’s annual target is 1,123 additional homes per year between 2015 and 2025, which the proposals will contribute towards. The Housing Zone designation for the wider town centre also supports the accelerated delivery of new homes. Redbridge’s Core Strategy (2008) and Redbridge’s Retail, Leisure and Office Demand Study (2012) support new retail floorspace to satisfy demand.

15 Ilford Town Centre is a key London Centre and the main economic and retail hub for the borough. It has been adversely impacted upon by the opening of other nearby competing retail developments, notably Westfield Stratford and out of London shopping malls. A key priority for the borough is to regenerate and re-establish its core retail and commercial offer, to maintain and enhance its Metropolitan Town Centre position, with renewal of existing retail facilities and stores, and continue to provide a local offer. The proposals are for a net uplift of 2,088 sq.m in terms of retail floorspace. Given the Town Centre location, the level of increased retail floorspace does not raise any strategic issues and has significant potential to contribute towards the ongoing regeneration of Ilford, in line with London Plan Policy 2.15

16 The site is also located within the Ilford Opportunity Area as designated on London Plan Map 2.4 and Annex 1. London Plan Policy 2.13 states that development in Opportunity Areas is expected to maximise residential and non-residential densities and to contain a mix of uses.

17 The proposal for a high density retail and residential mixed use development is therefore wholly consistent with the policy aspirations for this area and has strong strategic support in principle; subject to meeting design quality both in terms of the built form and the residential quality, and this is discussed in greater detail in the urban design section.

Housing

Housing Supply

18 The application proposes 683 residential units in total, which is equivalent to just over 60% of the borough’s annual monitoring housing target as defined by the London Plan. The proposed delivery of these new homes is strongly supported in accordance with London Plan Policy 3.3.

	Private	Intermediate	Affordable Rent	Total
1-bed studio	53	-	-	53 (8%)
1-bed apartment	275	-	-	275 (40%)
1-bed mews house	-	5	1	6 (1%)
2-bed apartment	262	-	-	262 (38%)
2-bed mews house	-	4	4	8 (1%)
3-bed apartment	66	-	-	66 (10%)
3-bed mews house	-	1	2	3 (<0.5%)
3-bed town house	-	-	9	9 (1%)
4-bed town house	-	-	1	1 (<0.5%)
Total	656 (96%)	10 (1.5%)	17 (2.5%)	-

Table 1: Residential unit breakdown of size and tenure by habitable room

Affordable Housing

19 London Plan policy 3.12 requires borough councils to seek the maximum reasonable amount of affordable housing when negotiating on individual private residential and mixed-use schemes. In doing so each council should have regard to its own overall target for the amount of affordable housing provision. This target should take account of the requirements of London Plan policy 3.11, which include the strategic target that 60% of new affordable housing should be for social rent or affordable rent and 40% for intermediate rent or sale. Negotiations on sites should take account of their individual circumstances including development viability, resources available from registered providers (including public subsidy), the implications of phased development including provisions for re-appraising the viability of schemes prior to implementation ('contingent obligations'), and other scheme requirements.

20 The applicant is proposing to deliver 27 affordable housing units (4%), or 6% by habitable room, broken down into 63% affordable rented and 37% intermediate accommodation. The applicant has submitted a viability appraisal in line with London Plan policy 3.12 in order to demonstrate that the level of affordable housing provision is the maximum reasonable amount the scheme can deliver. This is currently being independently assessed by consultants, on behalf of Redbridge Council.

21 At this stage, GLA officers consider that the overall initial offer is very low and the applicant is asked to re-visit this. It will be important that the costs, assumed rent levels, phasing and growth modelling (in light of the impact of Crossrail) are carefully scrutinised and if there is a long build out or phased programme proposed, that the Council consider a review mechanism. The tenure split at present is in accordance with the London Plan, and any increased offer would be expected to reflect this, or justify any variation.

22 Both the viability appraisal and the independent assessment should be shared with GLA officers before the Mayor considers this application again, in order to assess compliance with London Plan policy 3.12, notably that the maximum reasonable amount of affordable housing is being achieved.

Housing Mix

23 London Plan Policies 3.8, 3.9 and 3.11 and the Mayor's Housing SPG all seek to ensure that mixed and balanced communities are created in new development through, for example, the provision of a mix of tenures and unit sizes across development, including the priority need for family sized units.

24 Table one provides the indicative unit mix at this stage, which shows that the development will provide a mix of units from one to four bedrooms. 79 of the proposed units homes would be three-bedrooms or more, which equates to 11.5% across the proposed development. It is noted that of the 27 affordable units, 48% would have three-bedrooms or more, and the provision of larger affordable homes is supported. Whilst it is acknowledged that this is a town centre location, where there is a demand for smaller units and there are density and design constraints for traditional family housing types, Redbridge should satisfy themselves that the proposed mix meets local needs for family housing.

25 In addressing the total affordable housing contribution in paragraphs 23-24 above, the applicant should see to proportionately increase the family sized units.

Residential density

26 London Plan Policy 3.4 requires development to optimise housing output for different locations taking into account local context and character, design principles set out in London Plan Chapter 7 and public transport capacity. Table 3.2 provides the Sustainable residential quality (SRQ) density matrix in support of this policy. Based on the characteristics of the location, the site is within a 'central' setting being within a Metropolitan town centre, with a high PTAL. For a 'central' setting with a PTAL of 6a, the density matrix suggests a residential density in the region of 650-1,100 habitable rooms per hectare. With the imminent arrival of Crossrail services, this higher end density target is reinforced at Ilford.

27 The developable gross site area is 1.95 hectares of which 70.3% is proposed for residential use. As such, the residential density equates to 499 dwellings per hectare or 1,278 habitable rooms per hectare (based on the methodology set out within Paragraphs 1.3.62 - 63 of the Mayor's Draft Interim Housing SPG 2015).

28 The proposed density exceeds that of the SRQ Matrix, however, following the Further Alterations, the London Plan now gives greater emphasis on the need for high density housing developments in appropriate locations such as town centres, opportunity areas and around transport hubs, including near Crossrail Stations. Policy 2.15 in particular recognises the contribution that higher density residential-led mixed use developments such as this, can have on the vitality and viability of town centres, by capitalising on high public transport accessibility, enhanced footfall and consumer spending.

29 The Housing SPG acknowledges that the maximum of the density range should not be seen as a 'given' and accepts that there may be exceptional circumstances where densities outside the ranges may occur. The SPG and the London Plan are explicit that in such scenarios, the housing should be of exemplary design quality with a high standard of residential quality and public realm, and should not exhibit any of the typical symptoms of an overdevelopment. This is covered further within the Urban Design section.

Residential quality

30 London Plan policy 3.5, Table 3.3 and Annex One of the Housing SPG set out requirements for the quality and design of housing developments, including minimum space standards for new development. These include the requirement for all units to meet or exceed the minimum floor space and floor-to-ceiling height standards, together with relevant wheelchair housing standards.

31 It is noted, and welcomed, that the units meet the minimum space standards within Table 3.3. At pre-application stage, GLA officers raised concerns with the proposed residential quality and comments were made in relation to the quantity of single aspect units (particularly those with a northerly aspect only) and the number of proposed units per core. Further comments are made in the Urban Design section below.

Children's play space

32 Children and young people need free, inclusive, accessible and safe spaces offering high-quality play and informal recreation opportunities in child-friendly neighbourhood environments. Policy 3.6 of the London Plan states that development proposals that include housing should make provision for play and informal recreation, based on the expected child population generated by the scheme and an assessment of future needs.

33 Based on the residential mix set out in table 1 above, and applying methodology within the Mayor's Play and Informal Recreation SPG, GLA officers have calculated an expected child yield for

the scheme of 83. Accordingly, the proposal would need to accommodate an overall play space requirement of 829.8 sq.m. in order to meet the 10 sq.m. per child standard sought by the SPG.

34 The submitted design and access statement sets out the proposed play strategy for the scheme, and identifies that the scheme could accommodate up to 2,411 sq.m. of playspace for children within the development:

Type of space	Quantum (sq.m.)	
	Private	Affordable Rent/ Intermediate
Under 5's playspace	945	126
5's to 10's playspace	489	85
11+ playspace	735	31
Total	2169	242

Table 2: Playspace breakdown

35 GLA officers note, and welcome, the fact that the quantity of playspace across the development will exceed the SPG standards. The detailed design and minimum quantum should be secured by condition.

Urban Design

36 Good design is critical to delivering the objectives of the London Plan. Its policies and supplementary guidance set out specific requirements for the design of all developments in London. Policy 3.5 of the London Plan includes requirements relating to residential design; Chapter 7 sets out policies on lifetime neighbourhoods (7.1), inclusivity (7.2), crime (7.3), character (7.4), public realm (7.5), architecture (7.6), tall buildings (7.7) and heritage (7.8) amongst others; the Town Centres SPG sets out guidance on the design of town centre development and the Housing SPG sets out guidance for residential design.

Layout

37 The existing store does little for the townscape of Ilford Town Centre, where there are a number of blank frontages, symptomatic of this type of 'big-box' retail built in the 1980s. The applicant has sought to wrap the new store with active uses and this has enabled the site to be animated on all sides. This is a significant improvement to the current arrangements and is strongly supported in urban design terms.

38 There are a series of public spaces proposed, with a clear hierarchy, which will serve proposed visitors to the new store and the residents. There are public realm improvements planned for Ilford, to mark the arrival of Crossrail, and the applicant has liaised with the Council to ensure the new development is integrated into the evolving town centre fabric, and this is welcomed.

Height and Massing

39 The proposed height and massing of the proposal, with a 29-storey tower and podium, is significantly larger than the contextual height of the surrounding area. However, given the town centre location, the opportunity area context, extant planning permissions in the vicinity and the significant transport improvements which will be delivered with the arrival of Crossrail, the scope

for a taller landmark building on the site to mark the evolution of Ilford is welcomed in strategic terms. The accompanying Townscape and Visual Impact Assessment (TVIA) demonstrates that the scheme would sit amongst a cluster of existing and proposed tall buildings within the town centre, including Pioneer Point. The massing is proportionate to the town centre's strategic designation.

Residential Quality

40 Further to general comments above regarding the Housing SPG standards, there was discussion at pre-application stage relating to specific aspects of the residential quality of the proposed scheme, notably the absence of legible street entrances to vertical circulation cores for Blocks 3 and 5 from the street. GLA officers are concerned about the convoluted and illegible residential entrance arrangements proposed, where residents and visitors need to negotiate multiple cores and thresholds before arriving at their front doors. Standard 3.1.1 of the Housing SPG sets out the need to ensure *"all main entrances to houses, ground floor flats and communal entrance lobbies should be visible, clearly identifiable, and directly accessible from the public realm."* Having the communal entrance lobbies to these blocks only identifiable and accessible from the upper courtyard undermines this, as well as making it more difficult for mobility and visually impaired people to negotiate the many thresholds created. However it is accepted that there needs to be a compromise between large retail provision and residential access to upper floors with these types of schemes, and there are site constraints with locally listed buildings.

41 In order to minimize the need for excessive maintenance and security, encourage a strong sense of resident ownership and ensure communal spaces will not undermine the quality of homes in the long term future of the building, the London Housing SPG looks to limit the number of units sharing each core on each floor to no more than eight. Whilst Blocks 1, 6 and 7 will all meet this standard, Blocks 2 – 5 are do not and need to be reconsidered. The architects should look at splitting all corridors so that communal circulation spaces are secure and are shared by no more than eight households and accessed by only one core. This can be achieved through either the provision of through, dual aspect units at the end of each corridor, or simply extending the units at the end of the corridor so they back on to each other. Given the other issues raised above with the residential quality of the scheme, GLA officers ask for this issue to be addressed by the applicant before the scheme is referred back to the GLA.

Materials and appearance

42 The scheme is predominantly brick and the proposed appearance of the various buildings is supported, having been the subject of pre-application discussions with a number of stakeholders.

43 Given the density and massing of a scheme like this, the quality of materials and the quality of detailing will have a significant impact on overall quality in the completed scheme. The Council is therefore strongly encouraged to secure the retention of the architects during detailed design phases, in addition to utilising appropriate conditions securing design detail and materials.

Inclusive design and access

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

45 London Plan Policy 3.8 currently requires all new housing to be built to 'Lifetime Homes' standards, and expects at least 10% of units to be wheelchair accessible or easily adaptable. However, in order to bring the London Plan into line with new national housing standards, the draft Minor Alterations to the London Plan propose to replace this with a requirement that 90% of units meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings' and the remaining 10% of units meet Building Regulation requirement M4(3) 'wheelchair user dwellings'. The Council and the applicant should be mindful of this when drafting any related planning conditions and/or obligations.

46 The Design & Access Statement confirms that 10% of units will meet Building Regulation requirement M4(3) 'wheelchair user dwellings'. 72 units are identified. This should be secured via condition or legal agreement

47 The Design & Access Statement confirms that step-free access is provided throughout. On the whole, the scheme complies with London Plan policy 7.2 and is acceptable in this regard.

Sustainable development

Energy

48 The application has been submitted with an energy strategy which outlines the approach to carbon reductions following the London Plan Policy 5.2 energy hierarchy. In relation to the 'lean' stage, 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 mechanical ventilation heat recovery (MVHR) and low energy lighting.

49 The demand for cooling will be minimised through glazing ratio in relation to orientation, internal shading and solar control glazing and insulation.

50 The development is estimated to achieve a reduction of 45 tonnes per annum (3%) in regulated CO₂ emissions compared to a 2013 Building Regulations compliant development.

51 In relation to the 'clean' stage of the hierarchy, the applicant has carried out an investigation and there are no existing or planned district heating networks within the vicinity of the proposed development. The applicant has, however, provided a commitment to ensuring that the development is designed to allow future connection to a district heating network should one become available.

52 The applicant is proposing to install a site heat network. The applicant has confirmed 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.

53 The applicant is proposing to install a 505 kW_e gas fired CHP unit as the lead heat source for the site heat network. The CHP is sized to provide the domestic hot water load, as well as a proportion of the space heating. A reduction in regulated CO₂ emissions of 250 tonnes per annum (15%) will be achieved through this second part of the energy hierarchy.

54 In relation to the final 'green' stage of the hierarchy, the applicant has investigated the feasibility of a range of renewable energy technologies and is proposing to install 40kWp of solar photovoltaic panels. A reduction in regulated CO₂ emissions of 13 tonnes per annum (1%) would be achieved through this third stage of the hierarchy.

	Total residual regulated CO₂ emissions	Regulated CO₂ emissions reductions	
	(tonnes per annum)	(tonnes per annum)	(per cent)
Baseline i.e. 2013 Building Regulations	1,591		
Energy Efficiency	1,546	45	3
CHP	1,296	250	16
Renewable energy	1,283	13	1
Total		308	19

Table 3: CO₂ emission reductions from application of the energy hierarchy

55 Overall, a reduction of 308 tonnes of CO₂ per year in regulated emissions compared to a 2013 Building Regulations compliant development is expected, equivalent to an overall saving of 19%. The carbon dioxide savings fall short of the target within Policy 5.2 of the London Plan. The applicant should consider the scope for the additional measures aimed at achieving further carbon reductions.

Water and flooding

56 A Flood Risk Assessment (FRA) accompanies the application and confirms that the site is within Flood Zone 1, and has only small areas of significant surface water flood risk. The development is therefore acceptable in principle, in accordance with London Plan policies 5.12. Whilst the site itself is at low risk of surface water flooding other areas in the local vicinity are at risk of surface water flooding and it is therefore important that this site consider the application of London Plan Policy 5.13

57 The FRA proposes that the run-off from the site is restricted to three times greenfield run-off rate. This is proposed to be achieved by using geo-cellular storage at podium level to achieve between 742 cubic metres and 955 cubic metres of storage. The FRA and drainage strategy confirms that there will be a degree of surface level landscaping and that this will contribute to run-off reduction. The FRA states that groundwater is found at a relatively shallow depth of 1.2m below ground and that this, combined with London Clay soils, means that infiltration techniques and raingardens are not viable. The FRA does not appear to have considered green roofs and does not appear to have considered the option of a connection to the relatively nearby River Roding, which was highlighted in the pre application advice and could have reduced or removed the need for on-site attenuation.

58 Nevertheless the proposed drainage strategy complies with London Plan Policy 5.13 and should be secured via an appropriate planning condition.

Transport

Trip Generation

59 Transport for London (TfL) confirms that the methodology for the Traffic Assessment (TA) is appropriate and the mode split is a valid assessment. Given the location in a Metropolitan Town Centre, with a variety of transport choices, the network impact is likely to be satisfactory.

Car Parking – Commercial uses

60 Given that the car park is publically accessible with a minimal restriction, it is appropriate to apply London Plan retail maximum car parking standards of one space per 38 to 25 sq.m. The scheme proposes 410 spaces, which falls at the upper end of the standards at one space per 28 sq.m. The applicant is encouraged to reduce retail car parking and further promotion of sustainable travel modes.

61 A car parking accumulation survey has been provided and demonstrates that with the 410 spaces, the car parking peak between 13:00 to 14:00 on Saturday is predicted to have a maximum demand of 379 spaces. This implies that there is an overprovision of at least 31 car parking spaces at the busiest time and significantly more during the majority of the week. The applicant should justify the need of the overprovision of 31 car parking spaces.

62 Additionally, 10% active electric vehicle charging point (EVCPs) and 10% passive EVCPs should be provided, as required by the London Plan for retail parking.

Car Parking – Residential uses

63 The applicant is proposing 42 residential car parking spaces. TfL requests clarification of the exact number of Blue Badge parking to be provided for the wheelchair accessible/adaptable units. It should be noted that the Accessible London SPG seeks provision of 1 Blue Badge space per accessible unit. Additionally, 20% active EVCPs and 20% passive EVCPs should be provided for the residential spaces as required by the London Plan for residential uses.

Cycle Parking

64 The proposed number of cycle parking provision does not currently meet the London Plan (2015) cycle parking minimum standards requirement. A total of 1,032 long-stay cycle parking spaces and 17 short-stay cycle spaces are expected for the residential element. The scheme proposes 1,030 and 23 respectively. Two additional long-stay cycle spaces should be provided. Furthermore, 70 long-stay cycle parking spaces and 57 short-stay cycle spaces are required for the commercial uses – the scheme proposes 70 spaces at present, so 57 additional cycle spaces should be provided.

Pedestrian & Cycle Access

65 It is understood that Redbridge Council has secured funding for Crossrail complementary measures for improvements to the area immediately outside the station, however this is some distance from this development. The Council has also submitted a Major Scheme bid for Ilford town centre. If successful, funding would be provided to improve the High Road and regenerate the town centre. The Council has expressed an ambition to improve conditions for pedestrians in and around the town centre. TfL would therefore recommend that the Council and the applicant work together to identify the necessary improvements to pedestrian and cycle routes in the vicinity of the proposed site, as well as the mechanism for funding them.

66 A pedestrian environment review survey (PERS) audit should be provided by the applicant, as this will identify the necessary improvements. New signage should be provided to encourage the use of pedestrian and cycle links to Ilford station, bus stops and other nodes within the town centre.

Temporary Store

67 The applicant intends to erect a temporary store with limited retail services during the planned 18 month construction period. TfL has no objection in principle to the access to the temporary foodstore from Roden Street and the servicing taking place from a proposed lay-by on Chapel Road. TfL requests details of the temporary store arrangements to be provided, particularly of the movement of servicing vehicles and delivery times. A construction programme with details of on-site servicing will help TfL to assess this proposal fully.

Construction Logistics

68 A construction logistics plan (CLP) in line with London Plan Policy 6.3 should be produced. The CLP should include details of construction phasing, trips generated, site access arrangements, construction routes, co-ordination with other sites and cumulative impacts of construction traffic; any security issues should also be identified at this stage. This plan should be secured by condition and/or through legal agreement as appropriate and should accord with TfL guidance.

Delivery and Servicing

69 It is proposed that all delivery and servicing trips for residential units will use a new lay-by on Riverdene Road. TfL is satisfied with this approach, and a Delivery and Servicing Plan (DSP) with further details should also be secured by condition.

70 The new foodstore will be serviced on site via a proposed servicing bay accessed off Roden Street. A swept path analysis has been provided and TfL considers these arrangements acceptable in principle. The DSP should also cover the servicing arrangements for the supermarket, including the temporary store.

Travel Plan

71 The application should be supported by a travel plan (TP). TfL suggests that separate commercial use and residential TPs are produced and submitted rather than a single document. TfL encourages applicants to check the robustness of the Travel Plans by using the ATTrBuTE tool (<http://attribute.org.uk/>). A TP monitoring fee should be secured through the S106 agreement.

72 In summary, due to the high PTAL nature of the proposed development, it is unlikely to have a significant impact on the surrounding highway network. However, TfL wishes to raise detailed issues relating to the quantity of cycle parking, retail car parking, Blue Badge parking, EVCPs, temporary store arrangement and pedestrian and cycle access. Construction Logistics Plan, Delivery and Servicing Plan and Travel Plan should all be secured by condition or through the s106 agreement.

Mayoral Community Infrastructure Levy

73 In accordance with London Plan Policy 8.3 the Mayor commenced CIL charging for developments on 1 April 2012. Within Redbridge, the charge is £20 per square metre. This site is also within an area where Section 106 contributions for Crossrail are sought in accordance with London Plan Policy 6.5 and the associated "Use of planning obligations in the funding of Crossrail, and the Mayoral Community Infrastructure Levy SPG" (April 2013). In these situations, the Mayoral CIL is to be treated as a credit towards the section 106 Crossrail liability, and this should be reflected in the wording of the Section 106 agreement.

Local planning authority's position

74 Redbridge Council is still considering the application and have a Planning Performance Agreement (PPA) which seeks to take the application to Committee on 31 March 2016. It should be noted that Redbridge are awaiting responses on the Affordable Housing Viability, Environment Statement (ES) and the Daylight/Sunlight from specialist consultants which have been instructed to review these items, on their behalf.

Legal considerations

75 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. 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

76 There are no financial considerations at this stage.

Conclusion

77 London Plan policies on principle of development, housing, urban design, inclusive access, sustainable development and transport are relevant to this application. Whilst the scheme is broadly supported in principle, the application does not fully comply with the London Plan for the following reasons:

- **Principle of development:** The proposal for a high density retail and residential mixed use development is wholly consistent with the policy aspirations for this area and has strong strategic support in principle, subject to meeting design quality both in terms of the built form and the residential quality.
- **Housing:** The provision of new homes is welcomed and will help deliver the aspirations for Ilford Town Centre and the Housing Zone. At this point, GLA officers are unable to offer a clear steer on London Plan compliance with regards to affordable housing, pending the independent assessment of the submitted viability appraisal to ensure the maximum reasonable amount of affordable housing is being delivered. The proposed density and mix is broadly acceptable in this Town Centre location.
- **Urban design:** The proposed design is broadly supported and a tall, landmark building will help mark the transition of Ilford. Detailed comments relating to improving residential quality, notably the core arrangements should be addressed.
- **Inclusive access:** The scheme complies with London Plan policies 7.2 and is therefore acceptable.
- **Sustainable development:** The proposed measures within the energy strategy falls short of the policy requirements of Policy 5.2 of the London Plan and this should be addressed, or adequately justified as to why this is not achievable.

- **Transport:** Whilst TfL has no objections to the principle of the redevelopment, detailed issues relating to the quantity of cycle parking, retail car parking, Blue Badge parking, EVCPs, temporary store arrangement and pedestrian and cycle access should be addressed. Construction logistics plan, delivery and servicing plan and travel plan should all be secured by condition or through the s106 agreement.

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