

14 January 2016

Essex Brewery Site, Brunner Road, South Grove, Walthamstow

in the London Borough of Waltham Forest

planning application no. 153337FUL

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 the existing buildings and mixed-use development comprising the construction of two buildings (Building A: 5-7 storey, Building B: 4-8 storey) to provide 183 residential units, 478 sq.m. commercial space for use class (A1/A2/A3/A4/A5/B1/D1/D2). Provision of car parking, cycle, storage area, pedestrian/ cycle route, landscaping and amenity space.

The applicant

The applicant is **Metropolitan & Suburban**, the architect is **Kalyvides Partnership**, and the agent is **Montagu Evans**.

Strategic issues

The principle of the proposed **residential-led, mixed-use redevelopment** of the site is broadly supported in strategic policy terms. However, further information on the relocation or reprovision of the existing **social infrastructure** on site is required before it can be considered fully acceptable.

Specific issues relating to **employment, housing, affordable housing, play space, urban design, inclusive design, sustainable development, flood risk** and **transport** should be resolved prior to the final decision making stage.

Recommendation

That Waltham Forest Council be advised that while the principle of development is broadly supported, as set out in paragraph 75, there are some outstanding issues that need to be resolved and the remedies that could address them are set out within this paragraph.

Context

1 On 26 November 2015 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 and in agreement with the Council the Mayor has until 14 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 Category 1A of the Schedule to the Order 2008: *"development which comprises or includes the provision of more than 150 houses, flats, or houses and flats."*

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 0.6 hectare site is currently occupied by a low-rise warehouse building containing a number of light industrial units, in addition to the Kingdom Gospel Church and the Brunner Road Medical Practice. The site is bounded by South Grove and St James Street to the south, which intersect at a roundabout adjacent to the site and by Brunner Road which wraps the site to the west, north and east. Immediately to the north of the site are a number of small industrial units and a derelict public house, with a railway viaduct beyond. A pedestrian and cycle route link through an underpass accessed from Brunner Road to the High Street which lies further to the north and to the west of the site is the St James' Health Centre. The wider area is characterised by retail, residential and commercial development.

6 The applicant has carried out a planning history search which has not found a change of use application for the church use on site and it is therefore suggested that the current use is unlawful. With regards to the Brunner Road Medical Practice, the search revealed that the GP practice operated on a temporary planning permission which expired in December 2006 and records show no further applications to extend the use.

7 The site is within five minutes walking distance of St James Street and Walthamstow Queen's Road Stations and is within ten minutes walking distance of Walthamstow Central stations providing access to the tube, bus and rail networks. As a result, the site records a 'very good' public transport accessibility level (PTAL) of five on a scale of one to six, where six is excellent.

8 The site falls within the south western corner of the defined boundary of 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. The Council's Area Action Plan (2014) for the Town Centre originally identified the site for commercial-led, mixed-use redevelopment, however, in September 2015 the Council adopted the South Grove/St James SPD which has revisited the aspirations for the wider South Grove site. The application site is situated towards the centre of the SPD area and the document identifies it as suitable for residential-led, mixed-use development.

9 The neighbouring site to the east gained planning permission in February 2014 for a comprehensive mixed-use redevelopment comprising a supermarket, non-food retail floorspace and 245 residential units above. However, it is understood that this scheme is now unlikely to come forward and GLA officers have been engaged in pre-planning application discussions for revised proposals for this site.

Details of the proposal

10 The proposals seek the demolition of the existing buildings and the residential-led, mixed-use redevelopment of the site to 183 residential units and 478 sq.m. of flexible retail/community floorspace, including car parking, cycle storage, a pedestrian/cycle route, landscaping and amenity space.

11 The development comprises two buildings; a linear building of five to seven storeys to the west of the site (Building A) and a u-shaped building of four to eight storeys in height occupying the central and eastern portion of the site.

Case history

12 The applicant engaged with GLA officers in April 2014 as part of pre-application discussions for a larger site which included the application site, some of the industrial units to the north and the derelict public house which are part owned by other parties and the Council. The proposals included 320 residential units and approximately 1,500 sq.m. of commercial floorspace, and the principle of the residential-led development of the larger site was generally supported in strategic planning terms and further information was sought regarding the loss of employment and social infrastructure floorspace, housing, affordable housing, urban design, inclusive access, transport and climate change.

13 Following further engagement with the Council, the proposals were revised to reflect the emerging aspirations for the South Grove/St James SPD and the applicant's land ownership. A follow-up design meeting was held with GLA officers in August 2015 for proposals comprising approximately 182 residential units and 600 sq.m. of commercial/retail floorspace on the current application site. The overall design was broadly supported, however, the applicant was advised to give further consideration to maximising active ground floor frontages, providing ground floor residential entrances, the shared space strategy and to designing out a number of north facing single aspect units. The applicant was also advised to fully justify the loss of any existing permitted D Class uses on site.

Strategic planning issues and relevant policies and guidance

14 The relevant strategic issues and corresponding policies are as follows:

- Principle of development *London Plan; Town Centres SPG*
- Housing & affordable housing *London Plan; Housing SPG; Draft Housing SPG; Housing Strategy; Shaping Neighbourhoods: Play and Informal Recreation SPG; Shaping Neighbourhoods: Character and Context*
- Urban design *London Plan; Shaping Neighbourhoods: Character and Context, Housing SPG; Draft Housing SPG; London Housing Design Guide; Shaping Neighbourhoods: Play and Informal Recreation SPG*
- Inclusive design *London Plan; Accessible London: achieving an inclusive environment SPG*

- Sustainable development *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*
- Transport *London Plan; the Mayor's Transport Strategy*

15 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 Saved Unitary Development Plan Policies (2012), the Waltham Forest Local Plan Development Management Policies (October 2013), Walthamstow Town Centre Area Action Plan (October 2014) and the 2011 London Plan (Consolidated with Alterations since 2011).

16 The following are also relevant material considerations:

- The National Planning Policy Framework and Technical Guide to the National Planning Policy Framework.
- National Planning Practice Guidance.
- Waltham Forest Sites Specific Allocations Development Plan (Preferred Options) (July 2013).
- Walthamstow Town Centre Master Plan and Interim Planning Policy Framework (2011).
- South Grove/St James, Supplementary Planning Document (2015).
- Draft Minor Alterations to the London Plan 2015 (Housing and Parking Standards).

Principle of development

17 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.

18 As set out above, the Council's Area Action Plan (2014) for the Town Centre originally identified the site for commercial-led, mixed-use development including residential uses. However, in light of increased housing targets in the borough, changing retail trends and a shift of focus towards more sustainable modes of travel, the Council revisited its aspirations for the wider South Grove site and adopted the South Grove/St James SPD in September 2015 which identifies the application site as suitable for residential-led, mixed-use development; rather than commercially-led development.

19 Therefore, the principle of the proposed residential-led, mixed-use redevelopment of the site would be consistent with London Plan policies and is broadly supported in strategic and local planning policy terms.

Loss of employment floorspace

20 It is recognised that the proposal will result in a net loss of employment floorspace. As previously set out in GLA pre-application advice, this is not a strategic concern, as the site is not designated or protected as Strategic Industrial Land and the residential-led, mixed-use development is supported in local policy.

21 The proposals will reprovide 478 sq.m. of flexible retail/commercial/community floorspace within three ground floor units and the applicant has set out that although there will be a loss in employment floorspace, there will be a minor increase in the potential job generation as a result of the qualitative enhancement of the reprovided floorspace. The existing uses generate approximately thirty full time equivalent (FTE) jobs and the proposed new floorspace could potentially deliver up to 35 new FTE jobs. The applicant has committed to entering into a local labour agreement within a section 106 agreement which is welcomed and further information is welcomed on this when available.

22 Notwithstanding the above, London Plan policies seek to ensure that existing tenants are protected when new development occurs. Owing to the loss of employment floorspace, as requested within the initial GLA pre-application advice, the applicant should provide further detail on the businesses affected by the proposed redevelopment and the relocation process for existing tenants, including what measures will be made available to support their relocation, either permanently, or as an interim arrangement prior to returning to the site should this be feasible.

Social infrastructure

23 London Plan Policy 3.16 seeks to protect and enhance London's social infrastructure, including health facilities and states that proposals which would result in its loss in areas of defined need for that type of infrastructure should be resisted. The proposals will result in the loss of existing social infrastructure facilities; the Brunner Road Medical Centre and the Kingdom Gospel Church.

24 As acknowledged by the applicant, a key priority for the South Grove/St James SPD is the provision of a new, expanded health centre to accommodate additional capacity and provide better quality facilities. The document goes further to state that the loss of any existing health facilities will only be supported where this re-provision is secured and explores a number of potential locations for a new health centre, including the application site, on the adjacent St James' Health Centre site, or to the north on the existing commercial units.

25 While it is noted from the applicant's planning history search that the temporary planning permission for the small GP expired in 2006, the facility is still in operation and therefore serves a local need and GLA officers do not accept this as sufficient justification for its loss. However, it is noted that the application seeks a variety of use classes in the ground floor units, including D1 floorspace and it is therefore acknowledged that the proposals would not preclude the re-provision of health care facilities within the scheme. Further information on the extent to which the re-provision of health facilities in the development has been explored should be provided. It is also acknowledged that the layout of the proposed development would not prejudice the delivery of a new large health centre on the potential locations identified in the SPD to the west and north of the site.

26 It is understood from the applicant that the lease on the Brunner Road Medical Centre has since expired and the NHS has confirmed to the applicant that it will be vacating the premises later this year. Furthermore, it is understood that the GP who currently operates at the practice will be relocated at the adjacent St James Medical Centre and as a result there will be no net loss of GP's serving the area. While the above may help mitigate the loss of the existing centre, further information and confirmation of these relocation arrangements should be provided before the loss of this facility can be appropriately considered.

27 In addition to the above, further information is also welcomed from the Council on the future delivery of the new expanded health centre within the wider SPD area given this is a key priority for the regeneration of the South Grove/St James site.

28 With regards to the existing church use, while it is acknowledged that it may be unlawful; in the context of London Plan Policy 3.16, the applicant should provide further information on the measures that will be offered to support the church's relocation.

Housing

29 The proposals would deliver 183 residential units via the unit mix illustrated in the table below:

Unit type	No. units	% total
One bed	64	35
Two bed	96	52
Three bed	23	13
Total	183	100

30 The applicant has not yet confirmed the proposed quantum of affordable housing to be provided by the proposals but has confirmed that a financial viability report has been submitted to the Council for assessment that will inform the offer. In accordance with London Plan Policy 3.12, the applicant will be required to demonstrate that any future planning application delivers the maximum reasonable amount of affordable housing. As part of this, the viability report is expected to be independently assessed on behalf of the Council, with the results to be shared in full with GLA officers.

31 No indication of tenure has been provided. With regards to affordable housing tenure, London Plan Policy 3.11 establishes a strategic target of 60:40 social/affordable rented: intermediate housing. The applicant should be mindful that the London Plan clearly establishes affordable rent within the definition of affordable housing set out in Policy 3.10, and makes clear that for the purposes of affordable housing targets, and specifically the 60:40 affordable housing split, affordable rent is categorised as helping to meet the 60% social housing component.

32 Further discussions with Council and GLA officers regarding the provision of affordable housing are strongly encouraged as this element of the scheme progresses. The applicant should also seek expressions of interest from Registered Providers regarding the delivery of the affordable housing units as soon as possible.

Housing choice

33 London Plan Policy 3.8, together with the Mayor's Housing SPG seeks to promote housing choice and seeks a balanced mix of unit sizes in new developments, with particular focus on affordable family homes. As the affordable housing component of the scheme is yet to be fully developed officers are unable to comment on this aspect of the scheme at this stage. However, the level of family sized units appears low compared to the Council's preferred housing mix of 50% family sized units in new developments. As this element of the scheme is developed further, the applicant should ensure that an appropriate mix of units is provided, taking account of local policy requirements and need, and the strategic priority afforded to affordable family accommodation.

Residential quality

34 As of 1 October 2015 the Government's technical housing standards came into effect. The Mayor intends to adopt the new technical guidance through a minor alteration to the London Plan. In advance of this the Mayor has released a policy statement setting out that from 1 October 2015 the relevant London Plan policy and associated guidance in the Housing SPG should be interpreted by reference to the nearest equivalent new national technical standard.

35 From the material provided within the submitted design and access statement the development has the potential to create a high quality of residential accommodation. All of the units will meet the Mayor's minimum space standards set out in table 3.3 of the London Plan and will have clear floor to ceiling heights that would exceed 2.5 metres. In addition, each residential core serves eight units or less and the residential layout enables a relatively high proportion of dual aspect of units which is supported in accordance with the design principles established in the Mayor's Housing SPG. As previously advised, the applicant should conduct ADF studies to ensure that all units are designed to optimise daylight/sunlight penetration.

36 However, concerns are raised with regards to the two ground floor north facing aspect units in Building B as they are likely to receive limited daylight and will not benefit from cross ventilation. As set out in GLA pre-application advice, the applicant is advised to explore a means of designing out these units, and this should be pursued further. This could be achieved by consolidating the two refuse areas on the northern frontage in a more central position and merging the two north facing single aspect units with those adjacent units on the north western and eastern corners to create a dual aspect two and three bedroom units with individual ground floor entrances. This would help resolve the above residential quality issue and deliver additional family-sized units in the borough.

Children's play space

37 Using the methodology in Appendix Two of the Mayor's Shaping Neighbourhoods: Play and Informal Recreation SPG (2012), the applicant has calculated a minimum play space requirement of 180 sq.m. for the proposed development. The applicant should provide the child yield breakdown to support this calculation and the expected ages of the children as different age groups have differing recreational needs.

38 Notwithstanding this, the development will provide 240 sq.m. of play space, with the majority located within the private podium courtyard garden in Building B (approximately 193 sq.m. formal play space) and approximately 47 sq.m. of informal play space within the proposed public realm. This is welcomed, however, limited information is provided on the nature of these areas and the playable features within them and this should be provided before compliance with London Plan Policy 3.6 can be appropriately assessed. The applicant should provide a play strategy to support the proposals. In addition, given the lack of alternative recreational facilities in the area and that the Walthamstow Town Centre is identified in the Council's AAP as being deficient in play space, the applicant will need to demonstrate how the needs for older children will be met by the proposals.

Residential density

39 Given the characteristics of the site, the public transport accessibility level of five and its central location, the London Plan density matrix (Table 3.2 in support of London Plan Policy 3.4) would suggest an indicative residential density of between 140 to 405 units per hectare (u/ha) for this development. The applicant has calculated the density of the development as 305 u/ha which falls comfortably within the suggested ranges in the London Plan.

40 The applicant should confirm that residential density figures have been calculated in accordance with guidance in London Plan paragraphs 3.30 and 3.31 in support of London Plan Policy 3.4, and the Mayor's Housing SPG (2012) and express them in both u/ha and habitable rooms per hectare (hr/ha).

Urban design

Layout

41 As set out at the pre-application stage, the proposed layout is broadly supported and is aligned to enable a pedestrian/cycle north-south link between South Grove and the railway underpass to the High Street, and also delivers the western portion of the key east-west pedestrian route through the wider SPD site. This will contribute towards improved local connectivity and the place-making aspirations of the wider area. The applicant is strongly encouraged to engage with the developer of the adjacent car park site to ensure that both scheme designs progress in a complimentary manner.

42 As requested, the applicant has worked to optimise active frontages to all public facing edges of buildings. The reconfiguration of the refuse stores on the eastern frontage of Building A to maximise active frontage on the new north-south link and the location of entry points to the ground floor cycle storage on this route is welcomed, as this will help further encourage street-based activity along the full length of this new route. The introduction of an additional entry to the central retail unit in Building A on the western frontage is also welcomed in accordance with GLA pre-application advice and this will provide a connection with the neighbouring NHS facility, while avoiding this edge becoming dominated by servicing and refuse storage. Notwithstanding this, the applicant should explore further opportunities to minimise and /or combine refuse and plant space along this western edge to further maximise active frontages, particularly at the north western corner.

43 In addition to the above, the applicant should give further consideration to reconfiguring the refuse and plant space along the western edge of Building B to be accessed internally in order to maximise active uses along this frontage.

44 It is important that the proposed commercial units relate well to all public facing edges and make positive contributions to the quality of the surrounding streets. With this in mind, the applicant should ensure that no 'back of house' uses are placed on public facing edges and that the commercial frontages remain visually permeable in order to encourage passive surveillance and animation and it may be appropriate to secure this via an appropriately worded planning condition.

45 Notwithstanding the above, the introduction of individual ground floor entrances to the residential units is strongly supported and helps contribute towards meeting the above objectives. In particular the inclusion of ground floor entrances to residential units along the Brunner Road (north) frontage is welcomed and will set a strong precedent for creating a residential street as future development comes forward as part of wider master plan aspirations.

Public realm

46 The landscaping and public realm approach is broadly supported, however, the applicant is encouraged to 'soften' the landscape treatment within the communal courtyard as it appears quite 'hard' in nature from the material provided. As set out in the transport section below, the Pedestrian Environment Review System (PERS) audit accompanying the submission identifies footway width as a concern and therefore the applicant is encouraged to give particular focus to utilising the full depth of space between building line and pavement edge along South Grove to provide a welcoming area of public realm and generous footpaths that responds to the area of open space immediately to the south.

Residential privacy

47 In addition to the residential quality comments provided above, the applicant should set out in detail how privacy will be maintained between the residential units on fourth and fifth floors which face each other across the cut through section in Building B.

Massing and appearance

48 The varied massing approach ranging from four to eight storeys is broadly supported, and will provide enclosure to surrounding public realm without appearing overbearing from street level, while sitting comfortably within the emerging context and therefore raises no specific strategic issues. The indicative architectural response to the site is supported in terms of its simple and clean-lined appearance, effective balance between horizontal and vertical articulation and clear definition between ground floor frontages, mid and upper levels of blocks. The intention to use high quality brickwork is supported and gives the potential for creating a varied character to the scheme through contrasting brick tones and detailing. The use of glazed curtain walling systems to upper levels should be carefully detailed so as to secure the highest possible standard of architecture.

Inclusive design

49 London Plan Policy 3.8 requires all new housing to be built to Lifetime Homes standards. In order to bring the London Plan into line with new national housing standards, the draft Minor Alterations to the London Plan proposes to replace this with the requirement that *“ninety percent of new housing meets Building Regulation requirement M4(2) ‘accessible and adaptable dwellings’”*. Policy 3.8 also requires that 10% of units are wheelchair accessible or easily adaptable. The draft Minor Alterations to the London Plan proposes to replace this with the requirement that *“ten per cent of new housing meets Building Regulation requirement M4(3) ‘wheelchair user dwellings’, i.e. is designed to be wheelchair accessible, or easily adaptable for residents who are wheelchair users”*. As set out above the applicant should refer to the Housing Standards Policy Transition Statement which sets out how the existing housing standards should be applied.

50 The applicant states that the proposals are compliant with the new technical standards, the London Plan and the interim Housing SPG. The accommodation schedule highlights that twenty of the units will be wheelchair accessible or adaptable which meets policy standards, however, not all are accounted for on the marked plans and the applicant should clarify this. The applicant should also note that the wheelchair units should be provided across tenures. The Council should secure M4(2) and M4(3) requirements by condition.

51 Notwithstanding the above clarification and those comments regarding blue badge parking in the transport section below, the proposals appear to have been designed with inclusive design principles in mind and are in general accordance with London Plan Policy 7.2. However, further detail should be provided on the design details to be incorporated into the new pedestrian/cycle thoroughfare through the site to ensure that it remains safe to navigate by people who may be visually impaired.

Sustainable development

52 The applicant has applied the energy saving hierarchy detailing savings from energy efficiency measures of 2%, savings of 24% through the provision of Combined Heat and Power (CHP) and further savings from renewable energy of 8%, in this case the applicant is proposing

31.5 kWp of solar photovoltaic panels (PV) on the roof of the residential blocks and air source heat pumps (ASHP) to serve the non-domestic uses. A plan showing the proposed installation of the PV has been provided. While the use of ASHP's for cooling is supported, the heating load should be served from the communal system to maximise the benefit from the proposed CHP system.

Energy efficiency

53 The supporting sustainability statement sets out that the dwellings are not at risk of overheating according to the Part L 2013 overheating criterion. This is not considered sufficient to demonstrate compliance with London Plan Policy 5.9 and to confirm that the buildings are not at risk of overheating.

54 The applicant has stated that detailed overheating modelling in line with CIBSE TM52 and TM49 will be carried out post planning. While this is welcomed, it should be noted that the analysis could have an effect on the facade design and should therefore be considered at an earlier stage. The applicant should provide information on how the demand for cooling has been minimised by developing the design in compliance with Policy 5.9. Evidence should be provided to demonstrate that the risk of overheating has been assessed and addressed as far as possible through passive design. Dynamic thermal modelling is recommended and at the very least the applicant should demonstrate that all dwelling types have no more than a "slight" risk of experiencing high temperatures in summer under Part L 2013.

District heating

55 The applicant has identified that the site is within the vicinity of the proposed Upper Lea Valley district heating network, however, it has stated that communication with the Council's energy officers suggest that there are currently no plans for development of this network in the next ten years. Evidence of this correspondence should be provided to support this statement. Notwithstanding this, the applicant has provided a commitment to ensuring that the development is designed to allow future connection to a district heating network should one become available.

56 As set out above, the adjacent car park site to the east is likely to come forward for development in the near future. The applicant should therefore liaise with the developer of the adjacent site to consider opportunities for sharing an energy centre. Evidence of these communications should be provided to demonstrate that this opportunity has been suitably investigated.

57 The applicant is proposing to install a site heat network and should confirm that all domestic 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 site heat network should be supplied from a single energy centre and further information on the floor area and location of the energy centre should be provided.

Combined heat and power

58 The applicant is proposing to install a 50 kW_e gas fired CHP unit as the lead heat source for the site heat network and has been sized to provide the domestic hot water load, as well as a proportion of the space heating. The site is considered relatively small for the installation of viable CHP. Further information should therefore be provided on the proposed long term management arrangements for the system (e.g. electricity use, billing arrangements) as this will significantly affect the long term technical and financial viability of the system.

59 The carbon dioxide savings meet the target set within London Plan Policy 5.2 of the London Plan, however, the comments above should be addressed before the carbon savings and compliance with London Plan energy policy can be verified.

Flood risk and drainage

60 There is insufficient detail on the proposed sustainable drainage techniques to be applied to this site. Further details to demonstrate that the site complies with London Plan Policy 5.13 should be supplied before the application is referred back to the Mayor at stage two.

Flood risk

61 Environment Agency mapping indicates that there are some small areas of low surface water flood risk in or along the boundary of the site. These do not present any in principle flood risk issues but the applicant is advised to consider this risk in the detailed design of the scheme.

Drainage

62 The environmental statement states that appropriate sustainable drainage measures will be considered, however, this approach is not an acceptable implementation of London Plan Policy 5.13 and the applicant needs to identify the nature and scale of sustainable drainage proposals to meet policy requirements prior to any stage two referral.

63 For this site, the following techniques are likely to be applicable; green roofs, possibly designed to maximise water attenuation; landscaping specifically designed to maximise rainwater attenuation, notably along the green spine and the landscaped buffer strip alongside the rail line; infiltration/soakaways, subject to soakage testing of soils on site; design for exceedance, where some areas of open space are specifically designed to hold and the attenuation rainwater for less frequent storms (say 1 in 10 years or less often).

64 The applicant should also note that the adjacent site on South Grove is also likely to be developed and consideration has been given to the use of a range of sustainable drainage techniques similar to the list above. Indeed there may be scope for shared sustainable urban drainage systems between the two sites that could provide opportunities for both cost and space savings for both sites.

Transport

65 The proposals are for a car-free development with the exception of three on-site blue badge bays and a further four off-site bays retained along Brunner Road. This is welcomed, however, in line with the London Plan Housing SPG the applicant should explore the feasibility of increasing the blue badge parking for the residential element of the proposals as well as providing at least one for the commercial uses. In addition, the proposed exemption of future residents applying for parking permits within any controlled parking zones is strongly supported.

66 The proposed level of cycle parking, 326 long-stay and 70 short-stay spaces accords with London Plan standards. Nevertheless, the applicant should confirm that all parking accords with the guidelines contained within Chapter 8 of the London Cycle Design Standards.

67 As set out above, the proposals will help improve permeability through the site and the provision of a Pedestrian Environment Review System (PERS) as part of the submission is welcomed. The audit identifies footway width as a concern and therefore Transport for London

(TfL) encourages the applicant to liaise with the Council to establish how this could be addressed.

68 A multi-modal trip impact assessment has been provided and is supported in principle. However, larger similar survey sites would be recommended as small sample sizes can distort trip rates. Notwithstanding this, considering the nature, location and scale of the proposals, TfL is content that the proposals will not have any significant impact on the highway network.

69 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.

70 A framework delivery and servicing plan has been provided with on-street servicing proposed. While TfL's preference would be for servicing to take place on-site in order to minimise the impact on the local highway network, it is ultimately accepted in this specific instance due to space constraints meaning this may be unviable. Notwithstanding this, these arrangements may need to be revised should additional on street Blue Badge parking be proposed. The final document should be secured by planning condition.

71 A construction logistics plan should also be secured by condition and freight vehicles turning left from South Grove should be avoided to minimise the 'left-hook' conflict with cyclists. In addition, TfL welcomes the inclusion of a travel plan and considers its content acceptable. The final document should be secured within the section 106 agreement.

Community Infrastructure Levy

72 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 Mayoral CIL formally came into effect on 1 April 2012, and it will be paid on commencement of most new development in Greater London that was granted planning permission on or after that date. The Mayor's CIL will contribute towards the funding of Crossrail.

73 Waltham Forest Council adopted a CIL on May 15th 2014 and the relevant rates in this instance are £70 per square metre of GIA residential.

Local planning authority's position

74 At the time of writing the local planning authority's position is unknown.

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, 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

76 There are no financial considerations at this stage.

Conclusion

77 London Plan policies on Town Centres, employment, social infrastructure, housing, affordable housing, urban design, inclusive design, sustainable development, flood risk and transport are relevant to this application. While the principle of the development is generally supported subject to the submission of details set out in this report, there are some outstanding issues that need to be resolved and these are set out below:

- **Principle of development:** The principle of the proposed residential-led, mixed-use redevelopment of the site is consistent with London Plan policies and is broadly supported in strategic and local planning policy terms. However, further information/clarification on the relocation of the existing medical centre and church should be provided before it can be considered fully acceptable.
- **Housing & affordable housing:** The proposed quantum of affordable housing to be delivered has not yet been confirmed. Further discussion is welcomed on the outcome of the Council's independent assessment of the submitted financial viability information.
- **Residential quality:** From the material provided within the submitted design and access statement the development has the potential to create a high quality of residential accommodation. However, the applicant should further explore designing out the two ground floor north facing single aspect units.
- **Children's play space:** The applicant should provide further detail on the child yield breakdown and the features to be provided within the formal and informal play spaces before this aspect of the scheme can be appropriately assessed.
- **Urban design:** The proposed layout is generally supported and will help improve local permeability between South Grove and the High Street, in addition to enabling some of the key movement objectives of the SPD. Furthermore, the overall height and massing raise no strategic concerns. Notwithstanding this, the applicant should seek to further maximise the amount of active frontages along the western ground floor edges of both buildings, soften the landscaping of the communal courtyard, provide further information on how overlooking/privacy issues outlined above will be addressed and explore opportunities to help address those issues raised by the PERS audit.

- **Inclusive design:** While the proposals appear to have been designed with inclusive design principles in mind and are in general accordance with London Plan Policy 7.2, the applicant should confirm the amount and location of the wheelchair accessible units and explore the opportunity to increase the amount of onsite blue badge parking. Further information is also required on the treatment of the pedestrian/cycle thoroughfare that will ensure that it remains safe to navigate by people who may be visually impaired. In addition, the Council should secure M4(2) and M4(3) requirements by planning condition.
- **Sustainable development:** The carbon dioxide savings meet the target set within Policy 5.2 of the London Plan; however, further information is sought with regards to the ASHP's proposed, energy efficiency and overheating, district heating and CHP before compliance with London Plan energy policy can be verified.
- **Flood risk:** There is insufficient detail on the proposed sustainable drainage techniques to be applied to this site and the applicant needs to identify the nature and scale of sustainable drainage proposals to meet the requirements of London Plan Policy 5.13.
- **Transport:** Further discussion, clarification and/or commitments are required to address those issues set out above regarding blue badge parking, securing pedestrian environment improvement measures, cycle parking design standards, step free access at Walthamstow Central, and securing a construction logistics plan, delivery and servicing plan and a travel plan.

for further information, contact GLA Planning Unit (Development & Projects Team):

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