

SITE AT HYLANDS ROAD, E17 4AW

Planning Statement

September 2019



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1.0 INTRODUCTION

1.1 This report is submitted as part of planning application by the London Borough of Waltham Forest and Sixty Bricks for proposals to redevelop a poor quality brownfield site at Hylands Road within the London Borough of Waltham Forest.

1.2 The proposals comprise a high quality, residential development which will bring forward new high quality affordable (100%) housing. The scheme will make optimum use of this low quality, low density sites which are situated in a sustainable location for new residential homes. The design has been carefully considered to ensure that the development will significantly enhance the streetscene, contributing to the regeneration of the local area.

1.3 The area of the proposal site is 0.6 ha. The boundary of the plot is indicated on the site plan shown here.

1.4 The proposal is to redevelop the site to provide 120 new homes, which will deliver investment, environmental improvement and regeneration in the area. The proposals will deliver a number of key planning benefits including making optimum use of this



brownfield site, creating high quality market and affordable homes to contribute to the Borough's housing stock and creating design and visual improvements. The application proposals will comprehensively redevelop the site to create a sustainable community within a quality designed scheme, resulting in a genuine contribution to the regeneration of the local area.

1.5 As set out in detail in the accompanying Design and Access Statement, pre-application discussions have been undertaken with the Council regarding earlier

iterations of the proposal at each development site. The Council's feedback regarding the design has been addressed in the application proposals.

1.6 All proposals take place within the context of national, regional and local planning policy and recognised best practice. The proposed development is notable due to its compliance with the emerging Development Plan and the latest national and regional guidance on the provision of employment space, provision of additional housing and the enhancement of the built environment.

1.7 This document reviews the planning context for the issues associated with the development and considers recent relevant trends in the national planning debate. This document forms part of a series of reports submitted in support of each of the linked planning applications and should therefore be read in conjunction with these other documents, as set out below.

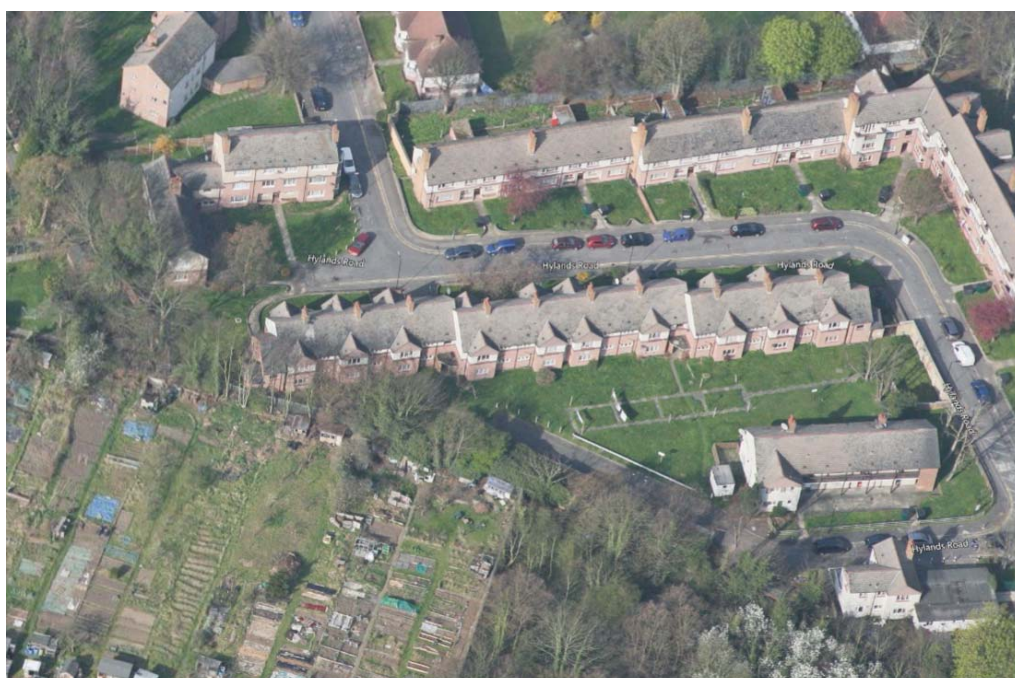
- Planning application forms, parts 1 and 2, ownership and agricultural holdings certificates;
- Application drawings including plan showing the site outlined in red, drawings and visuals of the proposal;
- CIL Additional Information Form;
- Air Quality Assessment by Cambridge Environmental Research;
- Archaeological Desk Based Assessment by PCA
- Bat Inspection Survey (daytime) by MKA Ecology;
- Bat Inspection Survey (nocturnal) by MKA Ecology;
- Construction Logistics Plan (outline) by Paul Mew Associates;
- Construction Method Statement (Outline) by Engie;
- Daylight, Sunlight and Overshadowing Study by MES;
- Design & Access Statement by On Architecture, including Materials, Photographs & CGIs, Crime Prevention/ Safer Places Report, Wheelchair Statement and Townscape & Visual Impact Assessment, Statement of Community Involvement and Refuse details;
- Drainage Strategy by MLM;
- Ecology/Biodiversity Report by MKA Ecology;
- Energy Statement by MLM;
- Fire Statement by BB7;

- Land Contamination Assessment (desktop) by Ground Engineering;
- Landscape Strategy, Open Space Assessment and Drawings by Breeze;
- Noise Assessment by AAD;
- Planning Statement by CMA Planning including Planning Obligations Statement;
- Sustainability Statement by MLM;
- Transport Assessment by Paul Mew Associates;
- Travel Plan by Paul Mew Associates; and
- Tree Survey/Arboricultural Impact Assessment by Arbeco.

1.8 These proposals, as will be explained in the rest of this Statement, will contribute to the long term regeneration objectives for the area and assist in meeting the Council's wider corporate and community objectives.

2.0 THE SITE AND SURROUNDINGS

- 2.1 The development site currently comprises part of an early 1960s development of 2/3 storey flats and maisonettes around Hylands Road cul-de-sac off Fernhill Court. The site, as shown in these photos, lies at the periphery of the residential development area on the eastern edge of Walthamstow, bounded by a range of residential properties to the west, and to open space in the metropolitan green belt to the east.



- 2.2 The Hylands Road site is owned by the Council, is centrally located in the borough and forms part of the Hylands Road Estate, to the South of Forest Road. The site is

bounded by some allotment gardens to the south. Epping Forest Reservoirs grounds to the east and residential units to the north and west. Also to the north of the site lies Hylands House School.

- 2.3 The dwellings on site are generally two and three storeys high and comprise of a mix of semi-detached and terraced houses and blocks of flats, as shown below. The existing accommodation comprises 50 rented bedsit units and 11 x 1 bed flats, 5 of which are leasehold properties and of which totals 61 units. There are pram sheds and garages adjacent to these properties.



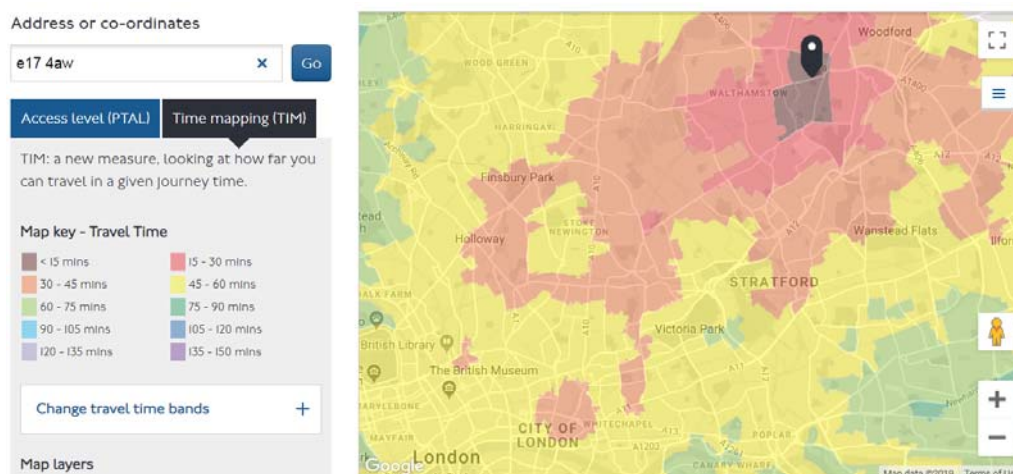
- 2.4 There are a number of amenities within a short distance of the subject site, Wood Street train station (Overground) is around 0.5 miles away, with a number of smaller retail, leisure, health and professional services along the adjacent Wood Street.

Walthamstow town centre lies about 1.3 miles to the south west, offering a complete range of retail and amenities including transport interchange, library, cinemas and two superstores. In addition to these, a large Tesco superstore forms part of the Hickman Avenue industrial estate along with a number of trade-type units just over a mile to the north. There are a range of school and leisure facilities in the area including Preschools, Primary, secondary and College education and a number of informal recreation ground and sports centres, including direct access to the metropolitan green belt. The photo below shows the site and some of the wider context.



- 2.5 The site is well served by the local road network, with the A503 providing direct access to the North Circular Road (0.3 miles), which serves as an orbital route through North London. The A112 and A104 (Epping New Road) provide access to the M25 (J26 approximately 6 miles to the North), along with the M11 1.4 miles to the east which serves as the primary route north into Essex/East Anglia.
- 2.6 The site is located within the Wood Street East 'WSE' controlled parking zone (CPZ) which is in operation Monday to Friday between 10am and 4pm. On the northern side of Forest Road, the Hale End CPZ has been recently introduced under an experimental traffic order for a period of up to 18 months. This is in operation Monday to Friday between the hours of 10am and 4pm.

- 2.7 The nearest train station is Wood Street, which is situated approximately 0.3 miles to the west of the subject site. The station is on the London Overground network and provides a regular direct connection into London Liverpool Street with a journey time of approximately 20 minutes and is a short walk along Fyfield Road. The closest London Underground station is Walthamstow Central (Victoria/Overground) approximately 1.3 miles to the south west, the area is well-served by buses, with local routes running along Wood Street (B160) and the A503 immediately to the north.
- 2.8 Public Transport Accessibility Levels (PTALs) provide a guide to the relative accessibility of a site. PTAL scores range from 1 to 6b, where 6b is the highest score and 1 is the lowest. The Transport for London PTAL calculator indicates a PTAL of 2, showing a low level of accessibility to public transport. In these locations, it is considered more appropriate to use Time Mapping, a new measure from TfL looking at how far you can travel in a given journey time, as shown below.



- 2.9 This map shows that despite the low PTAL, in the AM peak, all of Central London right across to Westminster and Mayfair can be reached within 45 to 60 minutes, whilst the City itself can be reached in under 30 minutes. As such, it is felt the site has a good accessibility.
- 2.10 The site does not fall within or near any designated Conservation Areas. There are no statutory or locally listed buildings on site, nor located nearby.

3.0 PLANNING HISTORY

3.1 The only relevant planning record for the specific site itself is a Prior Approval for Demolition of the Existing Buildings (reference 192336) approved on 16th August 2019. This covered 58-59 Hylands Road and the garages.

3.2 Other older applications for Hylands Road are as follows,

- Application 540080 - Hylands Estate Hylands Road - (OUTLINE) ERECTION OF HOUSING
- Application 540081 - Hylands Estate Hylands Road - (DETAILS) ERECTION OF 96 FLATS
- Application 550202 - Garages Adj To 60-67 Hylands Road - ERECTION OF 12 LOCK-UP GARAGES
- Application 560080 - Hylands Estate Hylands Road - ERECTION OF 2 LOCK-UP SHOPS & 2-1BED FLATS
- Application 590573 - Hylands Estate Hylands Road - ERECTION OF 8 FLATS FOR OLD PEOPLE
- Application 620617 - Hylands Estate Hylands Road - ERECTION OF 2 INVALID TRICYCLE GARAGES
- Application 900191 - Hylands Estate Hylands Road - ERECTION OF SINGLE STOREY BUILDING TO PROVIDE BOILER HOUSE

4.0 SUMMARY OF THE PROPOSED DEVELOPMENT

- 4.1 A full description of the proposed development is provided in the Design and Access Statement prepared by One Architecture which supports this detailed planning application. The detailed application proposes the following,

“Clearance of existing site and construction of three new buildings ranging in height from 4 to 9 storeys, in total containing 120 affordable dwellings, together with access, w/c car parking, cycle parking, amenity space and refuse provision and associated works.”

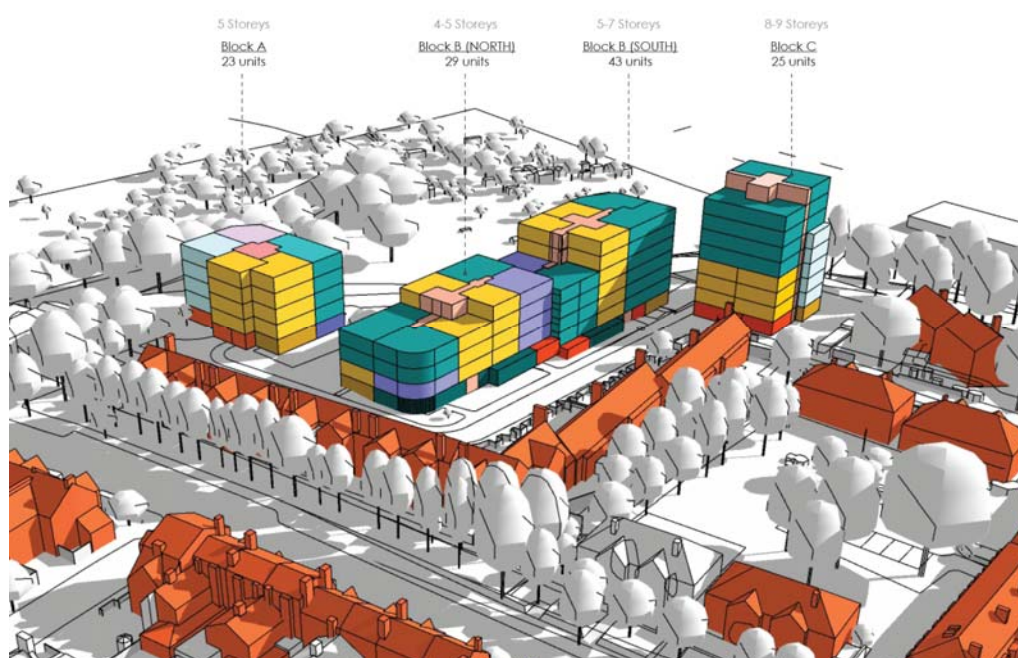
- 4.2 In summary the scheme involves the comprehensive redevelopment of the site for a residential development, creating three buildings, ranging in height from four to nine storeys, as shown on this proposed site plan. The scheme has been designed so it could be built in three phases. The scheme has been innovatively designed in relation to the surrounding constraints and opportunities.



- 4.3 The residential accommodation would provide 120 new homes (339 habitable rooms), all of which would be affordable social rented in tenure. The mix would be 51 x 1 bed, 32 x 2 bed and 37 x 3 bed. In terms of affordable, provision amounts to

100%, all social rented tenure. Family provision is 37 homes / 148 habitable rooms (44% in terms of habitable rooms).

- 4.4 The scheme has been designed to ensure 72% of the flats are dual or triple aspect and there are no north facing flats. The flats are generous in area, meet or exceed the statutory minimum areas as set out in both the London Plan and supplementary planning guidance.
- 4.5 The scheme has been sensitively designed to ensure that the proposed height of each development is reflective of the surrounding building heights and will result in an enhancement in the appearance of this part of the Borough, as this massing model of the scheme shows.



- 4.6 The building has been designed to respect adjacent buildings and residential windows to ensure that there will be no impacts upon the amenity of surrounding residential properties under construction. Amenity space is provided through private gardens, terraces & balconies to the individual residential flats, along with various landscape areas around the buildings. The communal amenity spaces are accessible to all future residents.
- 4.7 Sustainability features include the reuse of an accessible brownfield site in a sustainable location, high density development maximising site potential and

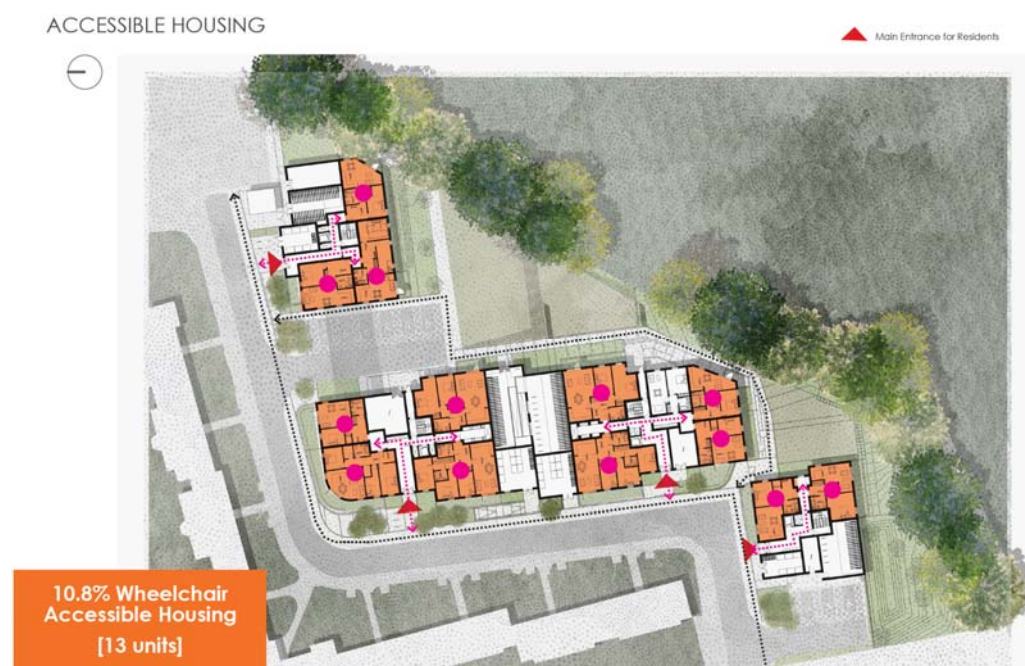
providing buildings that are highly insulated, reducing any heating or comfort cooling requirements and use of photovoltaics. The total carbon saving through the combination of energy efficient design, and renewable energy, against the building regulation target emissions would be 35%. More details are also included in the Energy Report submitted with the application.

- 4.8 The scheme includes a high provision of cycle parking, provided on site in-line with minimum standards set out within the London Plan, with 272 long stay and 16 short stay cycle parking spaces proposed, to total 288 spaces, as shown below. This level of provision and arrangement is therefore considered suitable, with these spaces being sheltered, secure, and easily accessible.



- 4.9 The level of vehicular parking to be provided within the site is in line with guidance set out within Appendix 4 of the Council's Development Management Policies. In line with these standards and given the location in a CPZ and the PTAL, the scheme will be car free, with the exception of nine w/c spaces provided for the 13 w/c flats. Future residents will not be eligible to apply for parking permits as agreed with LB Waltham Forest.
- 4.10 The proposed buildings have been designed to achieve be accessible with flats designed to building regulation M4(2), with lift access to flats and corridor widths / access within flats being suitable for wheelchair users. The scheme includes 13

homes (11%) which are designed to M4(3) standards and to be suitable for disabled residents as shown below, along with nine disabled car parking spaces (as above).



4.11 These w/c homes are all Social Rent tenure, as the Council is committed to providing affordable housing to those on the housing waiting list who are most vulnerable, which includes wheelchair users. The w/c units cover all unit sizes, with 7 x 1 bed, 3 x 2 bed and 3 x 3 bed w/c flats being included. All are located on the ground floor for easier access.

4.12 In summary, the proposal contains 120 dwellings, including:

- A total of 120 affordable social rent homes within the development ranging from 1 bed to 3 bed flats, which includes 100% affordable provision;
- A range of amenity space provision including private terraces or balconies for each new flat, along with podium garden area;
- Nine off-street disabled car parking spaces for residents;
- 288 cycle parking spaces provided for residents;
- All new homes designed to building regulation M4(2) standards and 11% of new homes (13) designed to be suitable for disabled residents; and
- The total carbon saving through the combination of energy efficient design, and renewable energy, against the building regulation target emissions would be 35%.

Pre-Application Consultation

- 4.13 From the outset of the project the proposals have been discussed with the London Borough of Waltham Forest and whose comments and observations have helped to inform the submitted proposals. Various meetings have been held with Planning Officers and Design Officers, along with a Briefing Presentation was given to the Planning Committee on 3rd September 2019.
- 4.14 Public consultation was also undertaken in July 2019, with details set out in the Design and Access Statement submitted with the application, and as shown here.



5.0 PLANNING POLICY BACKGROUND

5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications are determined in accordance with relevant development plan policies, unless other material considerations indicate otherwise.

5.2 For this purpose, the statutory development plan comprises: The London Plan (2016) and the Waltham Forest Local Plan. In addition, national planning policy, supplementary guidance and emerging policies are relevant material considerations. We set out below the planning policy context within which the application should be considered.

National Planning Policy

- National Planning Policy Framework (NPPF) (2019); and
- National Planning Practice Guidance (2019)

Regional Planning Policy

- The London Plan: Spatial Development Strategy for London Consolidated with Alterations since 2011 (2016);
- Housing SPG (2016);
- Accessible London: Achieving an Inclusive Environment SPG (2014);
- The Control of Dust and Emissions During Construction and Demolition SPG (2014);
- Sustainable Design and Construction SPG (2014);
- Shaping Neighbourhoods: Character and Context SPG (2014); and
- The London Planning Statement (2014).

Local Planning Policy

- Core Strategy (2012);
- Adopted Policies Map (2013);
- Development Management Policies (2013);
- Planning Obligations SPD (2017);
- Inclusive Design SPD (2011); and
- Affordable Housing and Viability SPD (2018).

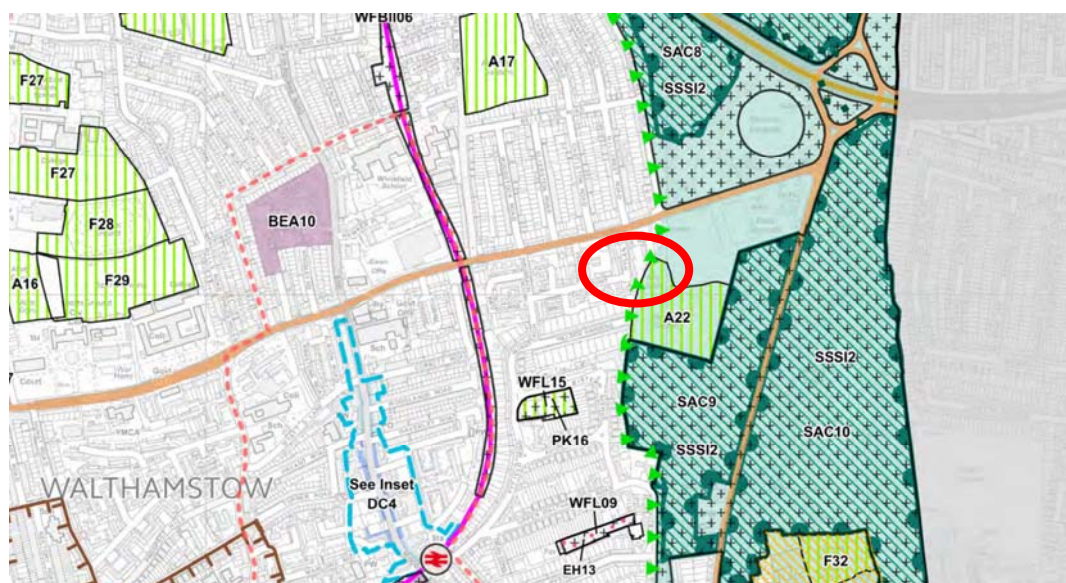
Emerging Regional and Local Policy

- The London Plan (Public Consultation Draft, December 2017)
- Waltham Forest Local Plan (Draft July 2019)

Key Planning Designations

5.3 As illustrated in the below extract from the Waltham Forest Adopted Policies Map, the site itself is undesignated, but the following designations adjoin the site:

- Park (A22)
- Green Corridor
- Metropolitan Green Belt



Policy Summary

5.4 From the above analysis of the planning policy framework there are four main issues which emerge. These are:

- The importance of making the most efficient use of land through the encouragement of residential developments in sustainable locations;
- The need to maximise the provision of new homes throughout London, including affordable homes with good levels of accommodation;
- The advantages of providing development at the site to encourage regeneration within the area; and
- The importance of good design to ensure that development enhances the character and appearance of the area.

PLANNING ASSESSMENT – KEY ISSUES

- 5.5 In light of the redevelopment objectives of the applicants and in the context of the planning policy position outlined above, the following paragraphs consider the key issues and themes associated with the application proposals.

A. The Principle of a Residential Redevelopment

- 5.6 The general thrust of national, regional and local policies is to secure sustainable patterns of development and the re-use of previously developed urban land. This objective is the common thread running through Government Guidance, the London Plan and Waltham Forest Local Plan which all encourage redevelopment to result in sustainable development and sustainable communities.
- 5.7 Both Government Guidance and the London Plan encourage development upon non-strategic employment land in order to make optimum use of valuable urban land and achieve increased levels of residential development upon brownfield sites to contribute towards urban renaissance and sustainable development.
- 5.8 A residential development is considered appropriate for this site, given the scale of development and the location and the need to create vibrant sustainable communities. Higher density developments such as this are becoming increasingly important in urban locations where they can breathe new life into formerly neglected areas, transforming them into vibrant communities.
- 5.9 The site is in residential use at present, within a residential area, with adjoining residential uses, so the proposed development would be compatible with the existing surrounding land uses.
- 5.10 The proposals will result in a residential development across the application site. It will make efficient use of the site to bring forward much needed affordable housing. The development will therefore comply with the strategic aims of the NPPF, London Plan Policies, Core Strategy Policies and Development Management Policies.

B. Economic Benefits

- 5.11 The CITB have estimated that to build each home requires 1.5 people in direct construction employment [CITB and HBF Report 'The Labour Needs of Extra Housing Output: Can the Housebuilding Industry Cope?', Michael Ball (September, 2005)], meaning the contract should employ 180 people full time throughout its duration.
- 5.12 Beyond the specific site and support staff directly employed, the Home Builders Federation (HBF) in their document 'Building a Recovery' (December 2010) estimates that for each home constructed four extra jobs are created in the wider economy outside of construction (primary industries, manufacturing and services). This would mean a further 480 jobs around the development.

Additional Council Tax Receipts and New Homes Bonus

- 5.13 The proposed development would provide a total of 120 new homes, which would have a beneficial impact on the Council's annual Council Tax receipts. In addition, following the introduction of the New Homes Bonus in April 2011, the Government will match fund the additional Council Tax raised for new homes with an additional amount for affordable homes, for the following six years.

Additional Consumer Spending

- 5.14 The redevelopment will generate 120 additional households which will increase household spending in the local area and beyond. The ONS Family Spending Survey in 2011 shows that the average weekly household expenditure in London during 2010 was £577.80. The survey also shows that on average each household in London spends £87.00 per week on housing costs. Since this spending typically goes to major national institutions with only modest impacts on the local economy, this analysis deducts this.
- 5.15 This means that during 2010 (net) average weekly household expenditure in London was £490.80 which is equivalent to an annual figure of £25,522 in 2010 prices. Assuming that VAT had been paid on all of this spending, the average annual household expenditure was £21,056 for London during 2010.

- 5.16 Based on the assumptions set out above, it is estimated that the gross additional household expenditure generated by the additional 120 new homes would be approximately £2.5m per annum at 2010 prices. This additional household expenditure is a gross effect. Some of this spending may be spent out of the local area. Assuming 25% of the expenditure will be spent outside of the local area, this still means that the net additional household expenditure generated by the scheme is likely to be in the region of £1.9 million per annum at 2010 prices.

C. Housing Need

- 5.17 It is clear that there is increasing pressure upon the London Borough of Waltham Forest to provide for additional new homes in order to meet the needs of the Borough and contribute towards the needs of London as a whole. Furthermore, the need to provide for new development in a sustainable manner has highlighted the need to make the most efficient use of valuable urban land in order to reduce pressures upon other resources.
- 5.18 The site is previously developed 'brownfield' sites in an area with good public transport accessibility and are in close proximity to shops and services. The site is therefore in a sustainable location for new housing. Its redevelopment for housing will optimise the development potential of the plot, bringing forward much needed affordable housing in a brand new high quality development.
- 5.19 The London Plan goes further in terms of housing supply and recognises the pressing need for more homes in London in order to promote opportunity and provide a real choice for all Londoners with Policy 3.3 seeking the maximum provision of additional housing and Policy 3.4 requiring boroughs to ensure developments optimise the potential of sites.
- 5.20 The 2016 version of the London Plan has increased the annual housing target for Waltham Forest from 760 to 862 new homes, placing further pressure on the Borough to deliver new homes. But it is worth noting that in the latest draft London Plan from December 2017, this target is proposed to be increased to 1,794 new homes per year, a significant increase. Obviously this increase would still only partly

address actual housing need, given the number of households on the housing waiting register. It is important to deliver as many new homes as possible to meet the needs of the Borough. There is a real need for new housing development, such as this proposal, to come forward and help to meet this need.

- 5.21 The proposed development would provide 120 new dwellings, with a mix of unit sizes, which would contribute towards the above need and improve the quality of the housing stock, contributing towards Waltham Forest's housing targets in a sustainable way.

D. Housing Mix & Quality

- 5.22 The development will be brought forward by the London Borough of Waltham Forest and Sixty Bricks resulting in development of 100% affordable housing, exceeding the 50% sought by LBWF policy CS2.
- 5.23 The affordable homes would all be affordable social rented, above Waltham Forest's policy requirement of 60:40 split between affordable / social rented and intermediate. It is recognised this over-provision of social rented homes moves away from the normal tenure split sought, but it is felt that the 100% provision of affordable homes overall is an important planning benefit to secure, and justifies the tenure proposed. The provision of affordable homes would offer an important planning benefit in meeting the need for affordable homes, within the Borough and within London.
- 5.24 The current proposals have 51 x 1 bed, 32 x 2 bed and 37 x 3 bed. Family provision is 37 homes / 148 habitable rooms (44% in terms of habitable rooms). Given the location of the site it is considered this is a good provision and there is also a reasonable split between 1 and 2 bed units. Policy DM5 seeks all housing developments to provide a range of dwelling sizes, which this mix clearly would, having a range of unit types. As such, it is considered that the mix complies with this policy objective.
- 5.25 It is acknowledged that policy DM5 cross references Table 6.1 which contains more detailed breakdown on mix requirements, as shown here. The 2 bed provision is

broadly the same as set out in the table, but it is recognised that there are more smaller units and less larger units than set out.

No. Bed Rooms	1 bed (2 person)	2 bed (4 person)	3 bed (5/6 person)	4 bed + (7/8 person)
Market	20%	30%	40%	10%
Intermediate Affordable Housing	20%	40%	30%	10%
Social/Affordable Rented Housing	20%	30%	40%	10%

5.26 However, Paragraph 6.6 of the Core Strategy Policy recognises that the proposed housing mix of new development should be considered on a site by site basis, and that LBWF take a flexible approach when applying the preferred housing mix outlined above. LBWF will consider site specific aspects such as:

- the character and context of the site and surrounding area,
- the size of the site and constraints; and
- financial viability.

5.27 The site is within residential use at present and contains 61 units, of which 50 are bedsits and the rest are 1 bed flats, so all 61 units are 1 bed or lower. The existing residents of these properties do have the opportunity of returning to the site and would need similar sized accommodation to do so. As such, a higher than normal level of smaller units is needed in case this occurs. If one looks at the net increase of residential units proposed on the site, all of the proposed units are two bed and above.

5.28 Viability is another factor and the provision of smaller flats (which have a higher value for their respective size) greatly assists with being able to bring the scheme forward and critically, deliver the 100% affordable housing. A key driver is to deliver 100% affordable housing, and this mix helps to ensure this can happen, but there are other good reasons for the mix as well, as set out. But in any event, the scheme has a mix of unit types, and does comply with the policy DM5 requirements.

5.29 Planning policies require that all new housing is built to 'building regulation M(4)2' standards and that 11% of homes within schemes such as this should be easily

adaptable and wheelchair accessible (compliant with building regulation M(4)3. Both of these requirements would be satisfied within the current scheme.

- 5.30 In terms of residential quality, 72% of the dwellings proposed are dual or triple aspect, as shown here. All dwellings have separate storage areas. The scheme has been designed to meet or exceed the London Plan minimum dwelling size requirements and in general, it is considered that the scheme would work well. All flats enjoy good aspect from their living rooms and offer good standards of amenity.



E. Car Parking and Transport Matters

- 5.31 The site is in a sustainable / accessible location with public transport links, close to Wood Street station and various bus routes, giving it a PTAL rating of 2. The site is also within walking distance of numerous local retail, employment, education and leisure services.
- 5.32 Car and cycle parking is proposed in line with local standards and national guidance. 272 long stay and 16 short stay residential cycle parking spaces proposed to total 288 spaces, in line with policy requirements. With regard to car parking, the area is within a CPZ and residents of the development will not be expected to receive parking permits. This can be secured through a suitably worded S106 clause. In terms of the residential element, nine parking spaces are provided on site for the disabled flats proposed. This 7% provision was agreed with Officers and is in excess of the minimum 3% of overall units requiring a wheelchair accessible space from the outset as detailed in Policy T6.1 of the draft London Plan.
- 5.33 The Borough's car parking standards set out in Appendix 4 of the Development Management Policies are maximum standards and as such the level of car parking proposed is in accordance with these standards. In addition, the proposed reduced levels of parking will encourage travel by alternative modes to the private car in

accordance with the Council's policies. This level of car parking provision is also considered to be acceptable as good cycle parking levels would be provided. Furthermore the change of use and associated reduction in vehicle movements to and from the application site is likely to have a positive impact on the traffic situation in the area.

- 5.34 In conclusion, and as detailed in the Transport Statement submitted with the application it is considered that the development is fully compliant with local, regional and national policy with regards to transport issues.

F. Delivering Regeneration

- 5.35 In considering the principle of development it is helpful to consider first the context of the wider area. The most recent government estimates show Waltham Forest in 27th position nationally for the extent of deprivation (out of 354 councils). Unemployment and worklessness are particularly acute among young people and in the southern wards of the Borough. 17% of Waltham Forest areas are in the top 10% of England for income deprivation, with deprivation being most intense the south and centre of the Borough.
- 5.36 Clearly this is an area in need of investment and this development would help towards the objectives of creating a successful neighbourhood. This proposal has the ability to deliver regeneration and a 'win' towards helping to address these problems, with new investment and new homes.

G. Amenity Space Provision

- 5.37 There are numerous planning policies which seek to ensure that all new developments provide sufficient amenity space to meet the needs of residents, and the scheme has been designed to incorporate suitable levels of amenity space through the provision of balconies and terraces and communal space for residential properties. The scheme therefore provides suitable levels of amenity space for residents in accordance with Local Plan policies, as set out below.
- 5.38 Policy DM7 Internal Space Standards and External Amenity Space Standards says the Council will aim to ensure that all new residential development, including

conversions and changes of use, is of the highest quality both internally and externally. For houses, a minimum of 50 sqm of private amenity space for one and two bed houses would be required, with an additional 10 sqm per bedroom provided for larger houses. For flats, a minimum of 10 sqm of amenity space should be provided per bedroom. The Policy does state that whilst each flat should provide an element of private amenity space, however, the overall provision can be provided in the form of both private amenity space and communal amenity space.

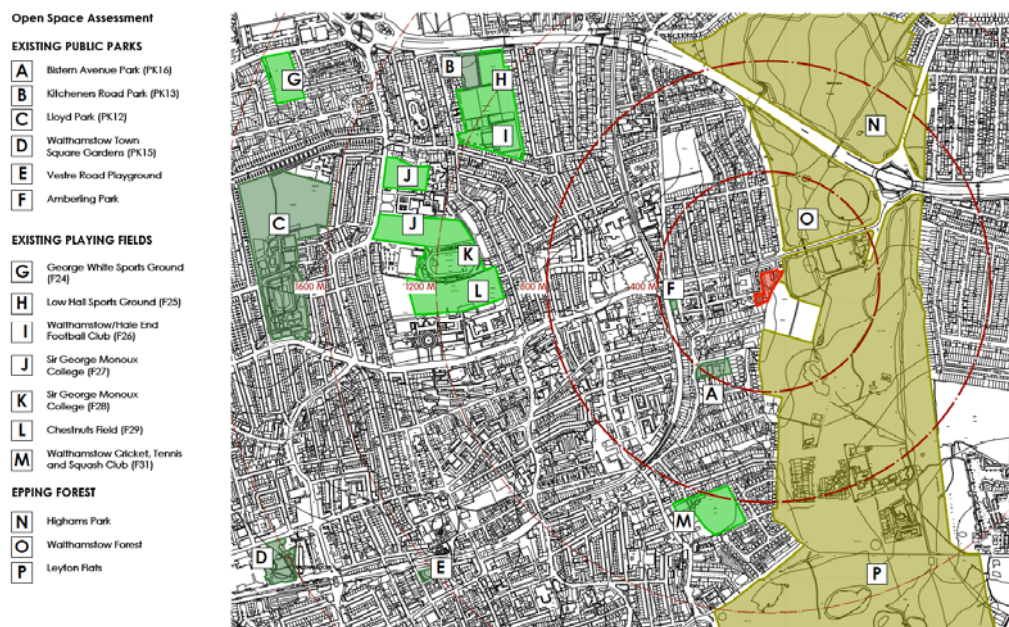
Private / Communal Amenity Space

- 5.39 The scheme has been designed to incorporate suitable levels of amenity space through the provision of balconies and communal space for residential properties. Each dwelling has either a private balcony or a terrace. As such, all of the proposed dwellings have access to their own private amenity space. The scheme therefore provides suitable levels of amenity space for residents.
- 5.40 The London Plan Housing SPD / Policy DM7 set minimum space standards for private open space with the SPD stating a minimum of 5 sqm required for 1-2 person dwellings and an extra 1 sqm to be provided for each additional occupant. The proposed balconies vary in size and shape, but all have a minimum depth of at least 1.5m in compliance with the standards. Policy DM7 then requires 10 sqm of private space per bedroom.
- 5.41 All of proposed balconies reach or exceed the minimum standards set out in the London Plan Housing SPG. The scheme provides a total of 2317 sqm amenity space, out of which 1147 sqm is proposed to be private terraces / balconies, 280 sqm is communal amenity space, 285 sqm is Suitable Alternative Natural Green Space (SANGS) and 605 sqm is dedicated play space. In terms of compliance with DM7, the site has 226 bedrooms and so needs 2260 sqm of amenity space, which can be provided with 1147 sqm via balconies/terraces, 285 sqm via the SNAGS space and 280 sqm via the communal space, which totals 1712 sqm and means there is a shortfall of 548 sqm against the policy requirements of DM7.
- 5.42 As such, there is a shortfall of communal amenity space for this specific site, however, as set out in the Open Space Assessment, the site adjoins Epping Forest,

which offers plenty of amenity options for future residents. Given this, the level of amenity space proposed is felt to be reasonable.

Children's Playspace

- 5.43 The issue of children's recreation and play space is important in considering proposals. Details of children's playspace has been calculated, based on the number of children within the flats of the scheme as set out in the "Shaping Neighbourhoods: Play and Informal Recreation", published as Supplementary Planning Guidance in September 2012 by the GLA, in the Open Space Assessment.
- 5.44 This shows the scheme could have a child yield of 107 children. The benchmark standard of 10 sqm per child is then applied to establish the quantitative requirements for play space provision arising, ie 1069 sqm of play space. In terms of these 107 children to accommodate, this would include children at all ranges up to the age of 17. The GLA document sets out that the maximum walking distance for 5 to 11 year olds is 400 metres (ie 5 minutes walk) and for 12 to 16 year olds is 800 metres (ie 10 minutes). The maximum walking distance for 0-4 year olds is 100 metres.



- 5.45 As this diagram taken from the Open Space Assessment shows, there are existing public play and amenity spaces around the site within 400m that are easily accessible for the 5 - 11 year old and above age group, which includes Bistern

Avenue Park and Amberling Park, both of which provides a series of spaces open to the public for all age groups and physical abilities, as detailed in the Open Space Assessment. Equally, the site is within close proximity to other facilities and Epping Forest.

- 5.46 As such, potentially all children could use off-site facilities and given the close proximity some of these spaces, it is felt more appropriate for older children (ie those aged 11 and over) to use nearby off-site facilities. This means on-site provision needs to be made for children aged 0 to 10, of which there are 75, so 746 sqm needs to be provided.
- 5.47 As set above, the site has dedicated play areas of 605 sqm, which is slightly under the 746 sqm needed for children aged 10 and under. However, given play facilities are located nearby within the 400 metre distance for 5-11 year olds, it is felt that some of this age group are likely to use these other options and the level of provision on site is acceptable.
- 5.48 The scheme includes two play areas situated in close proximity to the blocks with the seating area, where children can safely play whilst being supervised by accompanying adults. The location of the play area also allows for supervision from the windows of the surrounding flats.
- 5.49 It is considered that the dedicated amenity space and play space combined with the proximity of existing and under construction public play spaces will ensure that sufficient play space is provided within the development.

H. Design & Massing Issues

- 5.50 In terms of design, this application includes a Design & Access Statement produced by One Architecture, which summarises the design rationale. But in summary, National Guidance in the NPPF places considerable emphasis on the importance of achieving high quality design. The London Plan and the Local Plan also emphasis the need for high quality design to ensure that new developments are in-keeping with the local character of established areas of townscape.

- 5.51 In accordance with Policy DM29, the design constitutes a high quality development which will result in a significant enhancement to the area, as the detailed bay sections show below. The building has been carefully considered to relate to exiting surrounding development. It replaces the existing housing blocks and parking courtyard which detract from the visual amenity of the area.



- 5.52 The scale and massing has been designed to achieve the highest appropriate density for the development, given its highly sustainable location, whilst responding to and respecting the nature of the surroundings. The buildings are articulated by fenestration and balconies and the use of high quality materials. The proposal seeks to reinterpret elements from the surrounding area in a contemporary manner, to be utilised on a scale that is appropriate to its massing.
- 5.53 The massing of the building has been worked up in consultation with sunlight and daylight consultants to ensure that the light to adjoining properties is not unduly impacted as a result of the development. A full sunlight and daylight report is submitted with this application. This concludes that the impact of the proposed development on the properties neighbouring the development site will be small and in full accordance with the guidelines, whilst the daylight and sunlight amenity within the proposed development will generally be good, and that in overall terms the proposal accords with the guidance on daylight and sunlight provided by the BRE with respect to daylight.

- 5.54 National Guidance places considerable emphasis on the importance of achieving high quality design. The London Plan and the Local Plan also emphasises the need for high quality design to ensure that new developments are in-keeping with the local character of established areas of townscape. As set out in the Design & Access Statement submitted with the application, the proposal meets these key objectives.
- 5.55 In summary, the proposals have been carefully designed to ensure they respond positively to the site's location and setting. The scale and massing of the proposals is considered to respond positively to the prevailing urban form and would improve the character and appearance of the area. Due to the poor quality of the existing site, it is considered the proposals would enhance the character and appearance of the area.

I. Density

- 5.56 Given the Urban Density Zone and the (PTAL 2) accessibility level of the site, the London Plan Density Matrix gives a density range of 200-450 habitable rooms per hectare (hrph) and 70-170 units per hectare (u/ha).
- 5.57 The site proposals have a density of 565 hrph and 200 u/ha (based on 339 habitable rooms and 0.6 ha). As such, the figures fall above the relevant London Plan Density Matrix range. But in any event, as the GLA Housing SPG outlines at 1.3.8, these ranges *"should be used as a starting point and guide rather than as an absolute rule"*. Proper account should also be taken of other objectives, especially for dwelling mix, environmental and social infrastructure, local character and context, together with other local circumstances, such as improvements to public transport capacity and accessibility. It adds that the *"density matrix should not be applied mechanistically"*.
- 5.58 The new draft LBWF Local Plan at Policy 5 splits the Borough into zones, and it is considered this site would fall within a "Transition" Zone (the middle tier). Here it suggests a density of 150-250 u/ha is appropriate, which the application falls within. The Local Plan also uses Floor Area Ratio (FAR) and sets out up to 2.0 is appropriate. The proposals have a ratio of 1.4¹, so below the level.

¹ Based on a site area of 5834 sqm and total GIA of 8393 sqm.

- 5.59 As set out above, the design approach taken ensures that a high standard of accommodation is provided and that the density of development will not result in any adverse impacts in terms of neighbouring amenity and design and massing impacts. The density level is therefore considered to be acceptable.

J. Energy & Sustainability

- 5.60 The London Borough of Waltham Forest and Sixty Bricks are committed to delivering a sustainable development. In order to ensure this, a number of sustainable features will be incorporated into the site wide scheme, as set out in the Energy and Sustainability reports submitted with this application.
- 5.61 The Energy Statement prepared by Environmental Economics submitted with the application shows that renewable energy sources should be incorporated into the scheme to ensure that the development meets energy requirements and to provide a development reduction in carbon dioxide of 35% compared with a development compliant with the minimum requirements of Building Regulations. This includes high insulation levels and roof-mounted Photovoltaic panels.
- 5.62 In line with the GLA definition of Zero Carbon development on-site carbon reductions must be reduced by at least 35%, with the remainder of the domestic carbon being off-set via a payment. As set out above, after the energy hierarchy has been applied, domestic carbon emissions have been reduced by 35%. According to the carbon off-setting standards as set out by the GLA, £60 should be paid for each residual tonne of domestic carbon per annum over a period of thirty years. This leads to a payment being required.
- 5.63 This proposal will be sustainable, conforming to policy objectives, as detailed in the Energy Statement submitted as part of this application. The combination of energy efficient design and renewable energy technologies combine to reduce the total site consumption of traditional fossil fuel supplies from the baseline scenario.

5.64 The proposals include a number of other sustainability benefits, which are in accordance with the objectives of the Council's adopted Policies and fully embrace national planning policy and good practice. These include:

- encouraging more sustainable patterns of travel by reducing the need for people to travel by locating homes close to facilities and facilities close to homes;
- traffic reduction resulting from change of use;
- reducing people's desire to travel by unsustainable means by encouraging them to use convenient public transport facilities and discouraging the use of the private car;
- improving the general environment of the local area; and
- commitment to the need to have regard to sustainable principles.

5.65 More details are set out in the Energy Statement submitted with the application.

K. Section 106 Matters

5.66 As part of this proposal, a detailed Section 106 Planning Obligation will be required to ensure off site / on site requirements are secured and delivered. The Government's policy in respect of planning obligations (as set out in Circular 05/2005) has been well established for some time. From the 6th April 2010 the Community Infrastructure Levy (CIL) Regulations gave these policy tests legal force. Regulation 122 provides that "a planning obligation may only constitute a reason for granting planning permission if the obligation is:

- a. necessary to make to the development acceptable in planning terms;
- b. directly related to the development; and
- c. fairly and reasonably related to the scale and kind to the development."

5.67 This has had the effect requiring greater scrutiny of financial contributions within Section 106 Agreements. It is important to ensure that planning obligations are genuinely "necessary" and "directly related to the development".

5.68 In addition to the s106, the scheme would also be liable for Community Infrastructure Levy payments. This would include the London Mayoral CIL 2, which is chargeable at a rate for £60 per sqm in this location for the residential element. In

terms of the local Waltham Forest CIL, the Council adopted their CIL Charging Schedule on 15th May 2014. For this, the site falls within Zone B, with the rate for the residential rate being £70 per sqm.

5.69 Given this, the s106 would then be limited to site specific items only, with strategic aspects covered by CIL. As such, the proposed initial Heads of Terms are as follows,

- Provision of Affordable Housing, as set out above.
- Air Quality Monitoring fee.
- The signing of a Section 278 legal agreement under the Highways Act to allow the Council to reinstate and improve the footway adjacent to the boundary of the site.
- Carbon off-setting payment.
- Monitoring and legal fees.

5.70 These Heads of Terms are put forward on a 'without prejudice' basis and will be subject to further discussion with the local planning authority and other stakeholders.

6.0 SUMMARY AND CONCLUSIONS

- 6.1 This Planning Statement is submitted in support of proposals to regenerate this low quality, low density brownfield site to provide a genuine contribution to the regeneration of the area and make a significant contribution to the Council's affordable housing stock. The nature of the proposals is fully in accordance with the Council's objectives.
- 6.2 As it currently stands, the existing site represents an inefficient use of land that is indefensible in light of current planning guidance. The proposed development offers the opportunity for a positive outcome whereby new, high-quality housing, 100% of which is affordable can be provided in a highly sustainable manner, addressing all the drivers of good design currently advocated by central government, local government and housing associations, along with new social infrastructure.
- 6.3 The London Plan is a strong advocate of this approach, pushing for the redevelopment of these types of site to encourage more efficient use of land. The Plan seeks to ensure that densities of development in appropriate locations be maximised and encourages developments such as this proposal.
- 6.4 The proposal represents a significant opportunity for the LBWF and the redevelopment of this site in a sustainable manner would send out a clear message that regeneration is taking place and continuing, acting as a catalyst for further investment in the area.
- 6.5 The design of the proposal is of a high quality and has been formulated in response to the site's location. It would enhance the character and appearance of the area.
- 6.6 In summary the scheme would deliver the following benefits:
- the redevelopment of an under-utilised and unattractive site and the provision of new high-quality buildings that would enhance the local townscape;
 - a sustainable mix of residential uses that makes the best use of this previously developed, brownfield site in accordance with the prevailing planning policy and guidance;

- provision of 120 new homes including 100% affordable dwellings, that would meet a recognised need in the borough and also serve to enliven and strengthen the existing community; and
- a sustainable form of development that utilises innovative design solutions which take a sensitive and considered approach towards issues such as transport and reuse of urban sites.

6.7 It is considered that the application proposal represents an exciting opportunity to deliver a sustainable residential scheme within a high-quality development which would provide a significant benefit to the local area. For these reasons, it is considered the scheme is acceptable in planning terms, and therefore that planning permission should be granted.