



278-284 HOE STREET, WALTHAMSTOW

PLANNING STATEMENT

February 2021

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EXECUTIVE SUMMARY

The proposals will deliver a new high-quality development that will provide significant residential, socio-economic, architectural and environmental benefits which are summarised below.

RESIDENTIAL USE

The proposed development will;

- deliver high quality residential units in a mix of unit sizes and types, which bring diversity and choice to Walthamstow;
- supply of new homes to meet the acute demand within the Borough and assist in meeting the Council's housing targets; and
- provide excellent internal living conditions and in places exceed best practice guidance for living accommodation.

ACCESSIBILITY

The proposed development:

- has been generated on the principles of inclusive access; and
- provides clarity in the approach to routes through and across the site which are wide and legible.

SUSTAINABILITY / ENERGY EFFICIENCY

The proposed development:

- maximises the opportunity for sustainable development given the location adjacent to the rail station and the excellent public transport accessibility level;
- will achieve significant carbon reductions of 54.4% relative to a newbuild Part L1A for the residential element and 60.3% for the non-residential. A Carbon Offset payment towards zero carbon dwellings is also proposed, which meets PLP and Local Plan requirements.

AMENITY

The proposed development will;

- respect the amenity and privacy of adjoining residents through the scale, massing & design of the proposed building.
- provide amenity space where practicable and feasible including external roof terrace, balconies, health and fitness and the ground floor public realm.
- delivery of high-quality landscaping and public realm opening up the route between the building forming the 'Yard'.

HIGH QUALITY DESIGN

- The scheme has been designed to an exceptionally high quality by HAL Architects who have an established track record for creating award winning developments.
- The proposed development is supported by the Design Council.

1.0 INTRODUCTION

1.1 This Planning Statement has been prepared by DP9 Limited ('DP9') on behalf of Providence Capital Securities Ltd ('the Applicant') in support of an application for full planning permission for the redevelopment of 278-284 Hoe Street Walthamstow, London, E17 9QE ('the Site').

1.2 The Application relates to proposals for comprehensive redevelopment of the Site to provide a high-quality residential scheme comprising 66 build to rent units with associated amenity delivered alongside wider landscaping and public realm enhancements.

1.3 The proposed description of development ('the Proposed Development') is set out below:

Demolition of the existing buildings and redevelopment of the site to provide a new building comprising basement, ground and 17 upper floors with rooftop plant for residential use (C3) with associated amenity space, reconfigured vehicular and pedestrian access, landscaping and works associated and ancillary to the proposed development

1.4 The Proposed Development will play an important role at both strategic and local level, delivering a significant quantum of residential units alongside high-quality public realm improvements that will regenerate the Site, contribute invaluable towards the Borough's local housing stock and deliver on the London Borough of Waltham Forest ('LBWF') vision for the area.

1.5 This Statement should be read and considered in conjunction with the plans and drawings submitted as part of this planning application. In addition to this Statement, the following supporting documents have been agreed with officers and are submitted in support of the application:

Application Forms, Certificates & Notices
Cover Letter
Application Fee
Site Location Plan
Existing Plans
Proposed Plans
Design & Access Statement
Heritage Statement
Transport Assessment in TfL Healthy Streets TA format including <ul style="list-style-type: none"> • Travel Plans • Outline Construction Logistics Plan (in line with TfL guidance) • Waste Management Plan • Delivery and Servicing Plan • Parking Management Plan
Energy Statement
Sustainability Statement
Circular Economy Statement

Whole Life Carbon Statement
Sunlight, Daylight and Overshadowing Report
Landscaping Strategy
Fire Statement
Surface Water Drainage Assessment
Noise and Vibration Impact Assessment
Air Quality Assessment
Biodiversity Report including Habitat Regulations Assessment (HRA) - including Suitable Alternative Natural Greenspace Strategy (SANGS) including details of Epping Forest SAC mitigation
Statement of Community Involvement
Financial Viability Assessment
CIL Forms

1.6 This document provides an overview of the Site, the Proposed Development and an evaluation of the Proposed Development against planning policy and guidance. The Planning Statement is structured as follows:

- **Section 1** provides an introduction to the document;
- **Section 2** describes the site and the context of the surrounding area;
- **Section 3** provides a description of the Proposed Development;
- **Section 4** provides an overview of the pre-application advice received;
- **Section 5** sets out the relevant national, regional and local planning policies relevant to the planning application;
- **Section 6** provides an assessment of the Proposed Development against key planning policies;
- **Section 7** summarises the draft Section 106 Heads of Terms; and
- **Section 8** sets out the overall conclusions.

2.0 SITE & SURROUNDING AREA

The Application Site

- 2.1 Situated on Hoe Street between Priory Avenue to the south and Station Approach to the north, within Walthamstow Town Centre, the Site comprises a 0.08ha plot containing two buildings at 278-280 Hoe Street and 282-284 Hoe Street. The former comprises a bank over basement, ground and first floor with three residential units above. 282-284 Hoe Street comprises an office building over ground and two upper floors.

The buildings are not listed and are not located within a Conservation Area.

Surrounding Context

- 2.2 The site is ideally located for access to Walthamstow Central and within easy walking distance of the Town Centre. As such it represents an excellent opportunity to provide a sustainable residentially led development. The immediate area is mixed in character. The site is bounded to the north by the development site alongside the railway line which comprises the Travelodge Hotel at 13 storeys and a series of residential blocks with ground floor retail. Alongside the site on Station Approach are a series of small-scale garages providing motor repair and MOT services.
- 2.3 The character changes to the south and west of the site where there are predominantly lower scaled residential terraces on streets that run perpendicular to Hoe Street.
- 2.4 The surrounding area is also undergoing significant change. Planning permission has been granted for the redevelopment of several key town centre sites, including Juniper House to the east (Ref: 183989) at 18 storeys (currently under construction) and Central House (Ref: 183632) to the north on the Hoe Street. In addition, the Council have recently resolved to approve the redevelopment of part of the nearby Mall site which includes two residential towers at 26 and 34 storeys respectively (Ref: 202491).

Transport and Accessibility

- 2.5 The Site benefits from a small yard at the rear of the site for servicing and deliveries with pedestrian access is limited to the front of the building.
- 2.6 The Site benefits from the highest Public Transport Accessibility Level (PTAL) of 6b, with Walthamstow Central Station situated yards from the Site served by both London Overground services and the Victoria Line. Walthamstow Bus Station is also situated to the immediate north which is served by numerous public bus routes.

3.0 PROPOSED DEVELOPMENT

3.1 This section should be read in conjunction with the proposed application drawings and Design and Access Statement, prepared by HAL, submitted to accompany the planning application and describe the principal components of the Proposed Development.

3.2 It is proposed to redevelop the Site to provide a high-quality scheme comprising residential accommodation delivered alongside public realm enhancements which include the introduction of a new public route. The description of development has been set out below:

Demolition of the existing buildings and redevelopment of the site to provide a new building comprising basement, ground and 17 upper floors with rooftop plant for residential use (C3) with associated amenity space, reconfigured vehicular and pedestrian access, landscaping and works associated and ancillary to the proposed development

Summary of Proposed Development

3.3 The proposed scheme will play an important role at both strategic and local level. The development of the Site will deliver a substantial quantum of residential floorspace alongside significant public realm improvements in a high-quality development that will regenerate the Site, contribute substantially towards the Borough's housing stock, and deliver on LBWF's vision for the area. A summary of the proposed works is set out below:

- demolition of the existing buildings;
- Construction of a new 18 storey building with rooftop plant;
- Provision of a total of 66 Build to Rent (BtR) units in a range of sizes and tenures;
- Provision of 20% on-site affordable housing in the form of Discounted Market Rent (DMR);
- Provision of residential amenity, facilities and public space at ground floor to activate the frontages on all four sides of the building;
- Introduction of a new pedestrian route alongside the site building on the historic routes found in the area and providing an alternative route to the to the station.
- Provision of high-quality public realm and landscaping building on the Council's recent public realm enhancement Strategy for the area; &
- Provision of cycle parking, communal amenity space and associated ancillary facilities.

Proposed Uses

3.4 A breakdown of the proposed uses has been set out in the area schedule below. An assessment of the proposed uses against planning policy is set out in Section 6.0 of this Statement.

Use	GIA (sqm)	GEA (sqm)
Residential	5,507	5,940
Ancillary/Amenity/Plant	1,053	1,165
Total	6,560	7,105

Proposed Residential Split

- 3.5 The Proposed Development provides Built to Rent residential accommodation. An assessment of the proposed residential mix and tenure against planning policy is set out in Section 6.0 of this Statement. A total breakdown of proposed unit mix is provided in the schedules below.

Proposed Build to Rent Residential Unit Mix

Build to Rent		
Unit Size	No. of Units	Unit Mix
1-Bed / Suite	4	6%
1-bed / 2 Per	22	33%
2-bed / 4 Per	38	58%
3-bed / 5 Per	2	3%
Total	66	100%

Residential Amenity

- 3.6 The Site delivers a variety of residential amenity space across the Proposed Development in the form of external private amenity space, external communal amenity space and internal communal amenity facilities. The proposed breakdown is provided in the schedules below.

Type	Location	Total (sqm)
Communal	Ground Level Forecourt / Yard	110
	Ground - Internal	230
	Gym	159
	Roof Terrace	72
	Total	571
Private	Built to Rent Balconies	563
	Total	563
Total		1,134

Proposed Overall Parking Provision

- 3.7 There is no car parking proposed with the development in accordance with the principle of sustainable development given the location and high public transport accessibility. Short stay and long stay cycle parking will be provided in accordance with London Plan standards. The proposed parking provision has been summarised below.

Cycle Parking

Use	Long Stay	Short Stay
Built to Rent Residential	105 resident spaces	10 visitor spaces

Massing & Materiality

- 3.8 The Proposed Development comprises a two-storey 'podium' level, with the residential building rising above to 18 storeys in total. As set out in the supporting Design and Access Statement, the scale and form of the proposed building has been carefully considered to ensure they are not overbearing from local and distant views. The proposed massing has been developed through consultation with the Council's Planning & Design team as well as the Design Council.
- 3.9 The proposed material palette seeks to emphasise the verticality of the tower, with brick piers running from top to bottom. Between the window openings there is a spandrel panel which is finished in glazed ceramic. There is a clear distinction between base, middle and top.

Public Realm

- 3.10 The Proposed Development will also be delivered alongside significant public realm improvements, which include the introduction of a new public route formed around the 'Yard' along the western edge of the building. This will provide public access and a 'quieter' route to the Station. The Yard will be formed with high quality materials, covered with a steel structured roof and provide animation and activity at ground floor.
- 3.11 Wider landscaping enhancements are proposed along the southern edge of the building that will include planting and a single large tree that will complement the recent public realm works undertaken by the Council across the gyratory.
- 3.12 Further details of the proposed landscape and public realm proposals are set out in the landscape drawings and landscape chapter of the Design and Access Statement, prepared by HUW.

4.0 **PRE-APPLICATION CONSULTATION**

- 4.1 This Section should be read in conjunction with the Statement of Community Involvement, prepared by Development Intelligence, which is submitted in support of the planning application.
- 4.2 The submission has been informed by pre-application discussions held with LBWF planning and design officers, The Design Council and local residents and stakeholders.
- 4.3 All matters associated with the Proposed Development were discussed at length at the pre-application stage, with early engagement helping to inform the proposals.

Pre-Application Discussions

- 4.4 Formal pre-application discussions and design workshops have been held with LBWF to discuss the Proposed Development throughout 2019 and 2020, with an initial pre-application meeting taking place in October 2019. In total, four formal pre-application meetings and design workshops have been held with LBWF to develop the scheme design and address any issues raised, including the revised massing, the proposed materiality, the quality of the residential accommodation and the design and layout at ground floor. There have also been separate meetings with the Council's Highways team to discuss the cycle provision and servicing strategy.
- 4.5 The proposals were presented to the Design Council's Design Review Panel in June 2020 with a follow up workshop in December 2020. The Panel was largely supportive of the Proposed Development particularly in respect of the proposed massing and materiality. The Panel feedback related mainly to the arrangement at ground floor and the form and space within the Yard area. The Proposed Development addressed these comments by re-designing the Yard and the uses that face onto it to increase animation and activity. The treatment of the façade including the form of the balconies and the 'crown' of the building have also been amended to positively respond to their comments. A summary of the Design Review Panel feedback and responses is provided within the Design and Access Statement.

Public Consultation

- 4.6 Due to the ongoing COVID-19 pandemic and government social distancing requirements, a typical programme of engagement and consultation involving face to face contact has not been possible. Instead, the consultation has employed a range of virtual consultation methods, in addition to a community newsletter. This is described in detail in the Statement of Community Involvement, prepared by Development Intelligence, that accompanies this planning application.
- 4.7 A Community newsletter was distributed to 986 neighbours in November 2020. A virtual presentation was held on Zoom at 6pm on Wednesday 2nd December 2020.

Key Themes from the Consultation Process

- 4.8 Overall, the feedback forms provided a positive assessment of the Proposed Development. The ground floor layout has been remodelled and the proposed retail space has been removed from the ground floor and amenity space for residents is provided in this location. This ensures that the ground floor will be active and contributes to a sense of vibrancy on Hoe Street.
- 4.9 These changes to the ground floor layout also enabled a change to building access. The main building access will now be from the public space to the west of the site. This ensures that this space will be in constant use and permanently monitored. This change addresses concerns raised about anti-social behaviour in this space.
- 4.10 Following the submission of the application, the Applicant remains committed to consulting and engaging with local residents and other stakeholders. The intention is to maintain the dialogue with those individuals and organisations who have expressed an interest in the scheme and to keep people up to date with the project.

5.0 PLANNING POLICY CONTEXT

5.0 This section identifies the statutory development plan which is relevant to the Site and provides an evaluation of the Proposed Development against the relevant planning policies. The planning policy context comprises three levels of adopted and emerging policy – national, regional and local. Within each level there is both planning policy and guidance which combine to provide the framework for the consideration of the planning application.

National Planning Policy

5.1 National planning policy is set out in the form of the National Planning Policy Framework (NPPF), which was adopted in February 2019. At the heart of the NPPF is a presumption in favour of sustainable development (para 11), with three overarching objectives: economic, social and environmental. These are to be delivered through the preparation and implementation of plans and the application of the policies within the Framework.

5.2 This means approving development proposals that accord with the development plan without delay and where the development plan is absent, silent or out of date, granting planning permission unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits of development, or specific policies in the NPPF indicate otherwise.

5.3 The NPPF is a material consideration in the determination of a planning application but it does not form part of the Development Plan.

The Development Plan

5.4 Section 38(6) of the Planning and Compulsory Purchase Act 2004 (as amended) states that the determination of planning applications should be in accordance with the development plan, unless material considerations indicate otherwise. The statutory development plan for LBWF comprises the following:

- The London Plan: Spatial Development Strategy for Greater London – Consolidated with Alterations Since 2011 (March 2016);
- LBWF Core Strategy (March 2012);
- LBWF Development Management Policies (October 2013); and
- Walthamstow Town Centre Area Action Plan (October 2015).

5.5 The Development Plan policies referred to in this Planning Statement should be afforded significant weight in the decision-making process as they are consistent with the National Planning Policy Framework.

Emerging Planning Policy

- 5.6 Following direction from the SoS on the 29th January 2021, the Mayor can now publish the London Plan, and this is expected imminently without any changes to the policies contained within the “Publication London Plan”. These policies will now be given significant weight in decision making.
- 5.7 LBWF is also preparing a new Local Plan, which will cover the period from 2020 to 2035. Consultation on the latest draft ran from 22nd July 2019 until 30th September 2019. Adoption is anticipated summer 2021.

Supplementary Planning Documents (SPDs)

- 5.1 Both the GLA and LBWF have also prepared a number of Supplementary Planning Documents (SPDs) which expand on relevant planning policies. Where relevant, these documents have also been considered.

Site Designations

- 5.8 The Site is subject to the following designations, as identified in the LBWF Local Plan Policies Map:
- Walthamstow Major Centre; &
 - Walthamstow Town Centre Area Action Plan Area;

6.0 PLANNING POLICY ASSESSMENT

6.1 This section of the statement provides an evaluation of the Proposed Development and considers the proposals and associated impacts against planning policy relevant to the Site in respect of the following:

- Principle of Development;
- Residential Floorspace;
- Townscape and Heritage;
- Landscape and Public Realm;
- Transport;
- Energy and Sustainability;
- Environmental Impacts.

Principle of Development

6.2 Policy GG2 of the PLP states that to create successful mixed-use places that make the best use of land, policies must enable the development of brownfield land, prioritise sites which are well connected to public transport and apply a design-led approach to determine the optimum development capacity of sites. The policy also supports car-free developments, supporting a target of 80% of all journeys using sustainable travel, allowing for an efficient use of land (as required the Mayor's Transport Strategy).

6.3 Despite its highly-accessible town centre location, is underutilised and represents an excellent opportunity to deliver a scheme which optimises the development potential of the Site, in line with the three overarching objectives of the NPPF and :Policy GG2, whilst enhancing the character of the surrounding area through the delivery of a development of exemplary architectural quality which meets and exceeds the relevant national, regional and local planning policy standards, as set out below. It is therefore considered that the principle of development is strongly supported in this instance.

Residential Floorspace

6.4 Paragraph 59 of the NPPF sets out the Government's objective of significantly boosting the supply of homes. Paragraph 118 states that decisions should promote and support the development of underutilised land and buildings, especially if this would help to meet identified needs for housing.

6.5 The adopted London Plan sets LBWF a minimum target of 8,620 new homes to be delivered by 2025, whilst the PLP increases this target to 12,640 new homes by 2028/29.

6.6 WTC AAP Policy WTC2 states that, in order to promote a sustainable community in Walthamstow and to contribute to the Borough's housing target, LBWF will seek to deliver up to 2,000 new quality homes within the centre.

6.7 The Proposed Development would make a significant contribution towards the Borough's housing targets by delivering 66 new high-quality homes in a range of unit sizes and tenures. The proposed provision of residential units should be strongly encouraged by LBWF. An assessment of the proposed residential accommodation has been provided below.

Build to Rent

6.8 The Proposed Development seeks to introduce Build to Rent (BTR) as the residential product.

6.9 The PLP states that Boroughs should take a positive approach to the Build to Rent sector to enable it to better contribute to the delivery of new homes. Build to Rent developments can make a positive contribution to increasing housing supply and are beneficial in a number of ways. The PLP sets out a number of benefits of the BtR model, which have been listed below:

- attract investment into London's housing market that otherwise would not exist;
- accelerate delivery on individual sites as they are less prone to 'absorption constraints' on build-out rates;
- deliver more readily across the housing market cycle as they are less impacted by house price downturns;
- provide a more consistent and at-scale demand for off-site manufacture;
- offer longer-term tenancies and more certainty over long-term availability;
- ensure a commitment to, and investment in, place-making through single ownership;
- provide better management standards and better-quality homes than much of the mainstream private rented sector.

6.10 The proposed units will be of the highest quality, delivered in a range of unit sizes and tenures, as set out in Section 3.0. The scheme will be delivered alongside a variety of shared internal and external amenities for all residents, details of which are set out in the supporting Design and Access Statement.

6.11 It is therefore considered that the proposed introduction of BtR is acceptable and should be supported by LBWF.

Affordable Housing

6.12 Draft London Plan Policy H11 states that, where development meets the criteria set out below (nos. 1-10), the affordable housing offer can be solely Discounted Market Rent ('DMR') at a

genuinely affordable rent, preferably London Living Rent level. To qualify as a Build to Rent scheme, the following criteria must be met:

- 1) the development, or block or phase within the development, has at least 50 units
- 2) the homes are held as Build to Rent under a covenant for at least 15 years
- 3) a clawback mechanism is in place that ensures there is no financial incentive to break the covenant
- 4) all the units are self-contained and let separately
- 5) there is unified ownership and unified management of the private and Discount Market Rent elements of the scheme
- 6) longer tenancies (three years or more) are available to all tenants. These should have break clauses for renters, which allow the tenant to end the tenancy with a month's notice any time after the first six months
- 7) the scheme offers rent and service charge certainty for the period of the tenancy, the basis of which should be made clear to the tenant before a tenancy agreement is signed, including any annual increases which should always be formula-linked
- 8) there is on-site management, this does not necessarily mean full-time dedicated on-site staff, but all schemes need to have systems for prompt resolution of issues and some daily on-site presence
- 9) providers have a complaints procedure in place and are a member of a recognised ombudsman scheme
- 10) providers do not charge up-front fees of any kind to tenants or prospective tenants, other than deposits and rent-in-advance.

6.13 The BtR element of the Proposed Development has been assessed against the above criteria, and the proposals meet each of the requirements. Therefore, the proposed affordable housing offer can comprise solely of DMR, in line with draft London Plan Policy H11.

6.14 To follow the Fast Track Route, BtR schemes must deliver at least 35% affordable housing. The Mayor expects at least 30% of DMR homes to be provided at an equivalent rent to London Living Rent with the remaining 70% at a range of genuinely affordable rents. Where the requirements above are not met, schemes must follow the Viability Tested Route set out in draft London Plan Policy H5. Viability assessments on such schemes should take account of the differences between Build to Rent and Build for Sale development and be undertaken in line with the Affordable Housing and Viability SPG.

6.15 As the Proposed Development does not propose 35% affordable housing, the application does not meet the criteria for the Fast Track Route and is supported by a Financial Viability Assessment, prepared by DS2. This will be discussed further with the Council and their advisors.

Residential Unit Mix

- 6.16 PLP Policy H10 requires schemes to generally consist of a range of unit sizes, having regard to, *inter alia*, robust local evidence of need and the nature and location of the Site. At local level, LBWF Development Management Policy DM 5 states that LBWF will seek all housing developments to provide a range of dwelling sizes and tenures particularly focusing on the provision of larger family sized homes (three bed plus) in line with LBWF's preferred housing mix. LBWF will generally not support development proposals containing only smaller homes (one and two bed).
- 6.17 A summary of the proposed unit mix for both residential products has been set out below.

Build to Rent		
Unit Size	No. of Units	Unit Mix
Studio	4	6
1-bed	22	33
2-bed	38	58
3-bed	2	3
Total	66	100%

- 6.18 With regards to the BtR unit mix, owing to the Site's town centre location and the demographic of BtR tenants, there are fewer 3-bed units proposed. However, over 60% of the units are 2 bed or larger which are considered to be suitable for family accommodation in this location and such units are often occupied by young/small families. This is a principle that has been discussed and agreed with officers through the pre-application consultation.

Residential Standards

- 6.19 PLP Policy D6 requires all housing development to be of high-quality design and provide adequately sized rooms with comfortable and functional layouts, which are fit for purpose and meet the needs of Londoners, without differentiating between tenures. Additional requirements are set out within the Mayoral Housing SPG (2012) and London Housing Design Guide (2010), which provides further guidance on design standards for new residential development in London.
- 6.20 LBWF Development Management Policy DM 7 states that LBWF will aim to ensure that all new residential development is of the highest quality both internally and externally.
- 6.21 The proposed residential units have been designed to meet the adopted and emerging London Plan standards. All apartments will comply with the minimum internal space

standards for new dwellings set out in Table 3.1 of the PLP. The proposed design seeks to avoid single-aspect north-facing dwellings with 94% provided as dual aspect. All apartments will also have a minimum 2.6m floor to ceiling height in habitable rooms. Additionally, a minimum of 10% of all residential dwellings shall be designed in accordance with Approved Document M of the Building Regulations 2010 Part M4 Category 3 (2015 edition incorporating 2016 amendments). The remainder shall be designed in accordance with Part M4 Category 2.

- 6.22 With regards to amenity space, all units will have access to private amenity space, whilst high-quality communal amenity space will be provided at ground and roof level. The BtR units will also benefit from a range of internal shared amenity facilities.
- 6.23 It is therefore considered that the scheme provides an excellent standard of residential accommodation, in accordance with the relevant national, regional and local standards.

Townscape and Heritage

- 6.24 PLP Policy D9 requires tall building development to address the visual impacts on long, medium and immediate views, whilst taking account of, and avoiding harm to, the significance of London's heritage assets and their settings. The policy continues, requiring architectural quality and materials to be of an exemplary standard to ensure that the appearance and architectural integrity of the building is maintained through its lifespan.
- 6.25 LBWF Core Strategy Policy CS15 set out the criteria against which all tall building proposals will be assessed, whilst Development Management Policy DM31 states that LBWF will consider the impact on local and strategic views and the historic context when considering proposals for tall buildings.
- 6.26 The Proposed Development has been assessed against the relevant adopted and emerging tall building policies, as summarised above, and the Proposed Development is considered to accord with the policy requirements. The proposed scheme will be of the highest architectural quality, constructed in high-quality, contextual materials which respond positively to the surrounding area.
- 6.27 Both built heritage and townscape effects are assessed within the TVIA. This confirms that the Proposed Development has the potential to indirectly impact identified heritage assets within the study area. However, the changes in townscape setting would not result in the removal of any element of setting that contributes positively to the heritage significance of any of the relevant built heritage assets within the study area, nor would it distract from an appreciation of their heritage significance. For most heritage assets, the Proposed Development would appear as a new element of their urban townscape setting. The heritage assessment concludes that the heritage significance of the heritage assets would be sustained and there are no significant effects resulting from the Proposed Development once completed.

- 6.28 The TVIA, prepared by Peter Stewart Consultancy, confirms that the Proposed Development would respond appropriately to the townscape characteristics and its wider context as part of good place-making, and would form a focal point to the cluster of tall buildings in the town centre, designed to reduce its perceived massing in longer distance views. The TVIA concludes that the Proposed Development would represent a significant overall beneficial change to views and visual amenity in these areas.
- 6.29 Having regard to the above, it is therefore considered that the Proposed Development is acceptable in heritage and townscape terms.

Landscape and Public Realm

- 6.30 PLP D8 requires development proposals to encourage and explore opportunities to create new public realm where appropriate. Proposals should ensure the public realm is well-designed, safe, accessible, inclusive, attractive, well-connected, related to the local and historic context, and easy to understand, service and maintain. Landscape treatment, planting, street furniture and surface materials should be of good quality, fit-for-purpose, durable and sustainable. Lighting, including for advertisements, should be carefully considered and well-designed in order to minimise intrusive lighting infrastructure and reduce light pollution.
- 6.31 WTC AAP Policy WTC9 states that LBWF requires development to create, improve and reinforce convenient and safe pedestrian and cycle routes to the town centre, particularly improving north-south links, and to improve the key arrival points into the centre for residents and visitors, particularly at Walthamstow Station, by public realm, landscaping, signage, public art and other environmental improvements. LBWF will also seek that development significantly raises the quality of architectural and urban design in the area with development that positively responds to its context whilst encouraging the very best in contemporary design.
- 6.32 Further information on the proposed landscape and public realm proposals are set out in the landscape drawings, prepared by HUW however, in summary, the Proposed Development will be delivered alongside significant public realm improvements, which includes the introduction of the new public route as part of the Yard as well as the enhanced landscaping around the perimeter of the site. . The area will benefit from the addition of high-quality, durable paving, planting and street furniture which will contribute positively to the Site and the wider town centre.

Transport

- 6.33 At national level, the NPPF states that development should take opportunities to promote walking, cycling and public transport use (Paragraph 102). Both adopted and PLP policies promote development that will not adversely affect safety on the transport network. Notably, PLP Policy T1 states that development proposals should support the delivery of the Mayor's

strategic target of 80% of all trips in London to be made by foot, cycle or public transport by 2041, and requires development to make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes, and ensure that any impacts on London's transport networks and supporting infrastructure are mitigated.

- 6.34 At local level, LBWF Development Management Policy DM13 seeks to ensure that development is properly integrated with the transport network and is supported by appropriate walking, cycling and public transport links, whilst Policy DM16 seeks to effectively manage parking and to ensure the provision of safe and attractive parking facilities by encouraging car-free and car-capped development in locations that are highly accessible by public transport, and requiring development proposals to provide for well designed, high quality parking facilities in accordance with LBWF's maximum car parking and minimum cycle parking standards.
- 6.35 In response to the above, one of the key objectives of the Proposed Development is to promote the use of sustainable transport methods and encourage car-free travel. It is therefore considered that the Proposed Development meets the key transport objectives at national, regional and local level. Each aspect of the proposed transport strategy is further assessed below.

Car and Cycle Parking

- 6.36 PLP Policy T5 seeks that proposals help remove barriers to cycling and create a healthy environment in which people choose to cycle by securing the provision of appropriate levels of cycle parking (as per Table 10.2 of the PLP) which should be fit for purpose, secure and well-located.
- 6.37 As set out in the supporting Transport Statement, prepared by Pulsar, the proposed development will be car free and no on-site blue badge spaces are included. A total of 115 cycle parking spaces will be provided at the site, accessed by a dedicated bicycle lift provided for residents between the ground floor and cycle parking area. Residents will also be able to access the bike store using the main lifts from the upper store, for convenience, i.e. they will not need to exit the building after depositing their bikes or before collecting their bikes. 9 of the spaces provided will be able to be used by large, wide and adapted cycles with additional space provided.
- 6.38 The design of the cycle parking will conform to the London Cycle Design Standards and has been undertaken following several discussions with LBWF. Approximately 8% of the cycle parking includes spaces that can be used for larger bikes.
- 6.39 The cycle parking proposed at First Floor level will be assigned as long stay parking, totalling 105 long-stay cycle parking spaces. This leaves a total of 10 Short-stay spaces proposed at

ground floor level, within the curtilage of the site adjacent to Station Approach. The 105 long-stay cycle parking spaces are proposed to consist of the following:

- 22 spaces consisting of 11 Sheffield stands;
- 9 spaces for larger bikes, consisting of 5 wall Sheffield stands and 2 Sheffield stands with additional width; and
- 74 spaces on two-tier racks.

6.40 In addition, the Applicant is also exploring the potential for Brompton Cycle Hire docks to be provided within the residential amenity spaces. These would be available for residents to hire, as an alternative to owning a bike.

6.41 As such, the proposed cycle parking in accordance with the PLP and is therefore considered acceptable.

Healthy Streets

6.42 PLP Policy T2 requires development proposals to deliver patterns of land use that facilitate residents making shorter, regular trips by walking or cycling. Development proposals should demonstrate how they will deliver improvements that support the ten Healthy Streets Indicators in line with Transport for London guidance, reduce the dominance of vehicles on London's streets whether stationary or moving, and be permeable by foot and cycle and connect to local walking and cycling networks as well as public transport.

6.43 The Proposed Development has been developed in accordance with the latest TfL guidance on Healthy Streets. The proposals will increase permeability and reducing walking and cycling distances within the Town Centre through the new public route and public realm improvements. It is therefore considered that the Proposed Development is in accordance with PLP Policy T2.

Vision Zero

6.44 Paragraph 10.2.8 of the PLP states that the Mayor has a long-term vision to reduce road danger so that no deaths or serious injuries occur on London's streets. This Vision Zero will be achieved by designing and managing a street system that accommodates human error and ensures impact levels are not sufficient to cause fatal or serious injury. This will require reducing the dominance of motor vehicles and targeting danger at source.

6.45 The Proposed Development seeks to help deliver this aim through the improvement to the pedestrian network and the omission of car parking thus reducing dominance of vehicles whilst creating a more pedestrian-focused environment in and around the Site. It is therefore considered that the Proposed Development will help meet the Mayor's Vision Zero ambitions.

Servicing Strategy

- 6.46 The Proposed Development also seeks to significantly improve the existing servicing arrangement through the provision of a safe and efficient servicing strategy. Further details of the servicing arrangement are set out in the supporting Transport Statement.

Highways Impacts

- 6.47 The Transport Statement provides a robust assessment of the highways impacts of the proposed scheme resulting from the Proposed Development. The report concludes that, in the context of the guidelines within para. 109 of the NPPF, it is considered that there are no residual cumulative impacts in terms of highway safety or the operational capacity of the surrounding transport network.
- 6.48 It is therefore considered that the Proposed Development will have a minimal impact on the surrounding transport network and the proposals can be adequately accommodated within the existing highway and public transport networks. As such, the Proposed Development is in accordance with the NPPF, adopted and emerging London Plan and local LBWF policy, and is therefore acceptable in transport terms.

Energy and Sustainability

- 6.49 The NPPF establishes a presumption in favour of sustainable development. Paragraph 148 encourages proposals which support renewable and low carbon energy and associated infrastructure. Paragraph 153 states that, in determining planning applications, local planning authorities should expect new development to comply with any development plan policies on local requirements for decentralised energy supply unless it can be demonstrated that it is not feasible or viable; and take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.
- 6.50 PLP Policy SI2 requires major development to be net zero-carbon. This means reducing greenhouse gas emissions in operation and minimising both annual and peak energy demand in accordance with the following energy hierarchy:
- 1) be lean: use less energy and manage demand during operation.
 - 2) be clean: exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly.
 - 3) be green: maximise opportunities for renewable energy by producing, storing and using renewable energy on-site.
 - 4) be seen: monitor, verify and report on energy performance.

- 6.51 At local level, LBWF Development Management Policy DM10 states LBWF will ensure sustainable resource management and high environmental standards by requiring development of one or more units or greater than 100 sqm to be designed with regards to sustainable development principles and to achieve LBWF's stepped targets towards zero carbon by 2016 for residential development and by 2019 for non-residential developments. Carbon reduction targets can be met through a combination of on-site and appropriate off-site measures through contributions into carbon fund and the emerging Community Infrastructure Levy (CIL).
- 6.52 As set out in the supporting Energy and Sustainability Strategy, prepared by Twin Earth, the Proposed Development will deliver a building which is very energy efficient, resulting in a reduction in energy and carbon consumed by the site when compared to the Part L baseline. It will target improvements beyond Building Regulation requirements. Passive design and energy efficiency measures will provide the cornerstone to the energy demand and CO2 emission reduction achieved for the Proposed Development. A feasibility assessment of integrating low and zero carbon energy systems has been undertaken, and it has been found that high efficiency Air Source Heat Pumps (ASHP) would be the most suitable option in this instance.
- 6.53 Overall, it is anticipated that the Proposed Development will achieve significant carbon reductions of 54.4% relative to a newbuild Part L1A for the residential element and 60.3% for the non-residential. A Carbon Offset payment towards zero carbon dwellings is also proposed, which meets PLP and Local Plan requirements.
- 6.54 The application is also supported with a Circular Economy Statement and a Whole Life Carbon Assessment in accordance with the requirements of the PLP and follows the key principles of re-use/recycling, waste management and future re-use of elements or all of the building. these commitments will be implemented directly through the prescriptive deliverables and will be monitored throughout the construction process.
- 6.55 In summary, it is considered that the Proposed Development meets the relevant targets set out within the NPPF, the PLP and at local level.

Fire Safety

- 6.56 The submitted Fire Safety Statement has been prepared by Hoare Lea in response to PLP Policy D5 (Inclusive Design) and D12 (Fire Safety). The outline statement addresses the main fire safety items and principles and provides an overview of the requirements the scheme will meet. The key elements are summarised as follows –
- The building will be constructed with concrete cores and the fire resisting partitions between apartments and common corridors will be provided via fire resisting plasterboard panels.

- To limit the spread of fire within the buildings, all wall and ceiling linings will satisfy the appropriate classification stated within BS 9991:2015.
- The loadbearing elements of structure for the scheme, which has a height of 55.5m, will have a minimum period of 120 minutes fire resistance.
- The fire safety strategy will include a space separation analysis to establish the necessary boundary distance round each building. At this stage, it is not considered that there is any significant risk of spread of fire between buildings from the accommodation; however, detailed analysis will be provided during the design stage. The facades that cannot be left 100% unprotected will be designed to be provided with adequate fire resisting construction in the external wall.
- In accordance with Regulation 7(2), for each block that has a storey height in excess of 18m above the lowest adjacent external ground level, the external wall construction, and specified attachments including balconies, solar shading or solar panels, will achieve European Classification A2-s1, d0.
- The fire safety provisions and strategy for the residential building will be based on the guidance of BS 9991.
- All the apartments will be provided with a residential sprinkler protection system to support the residential common corridor smoke ventilation strategy.
- One lift will be provided as a lift with enhanced facilities for evacuation to facilitate the evacuation of mobility impaired occupants and meet the recommendations of Policy D5 (inclusive design) of the PLP.
- The management procedures of the evacuation lifts will be developed during the design stage.
- The residential ancillary at Basement Ground and First Floor of the development will be provided with a commercial sprinkler system

Environmental Impacts

- 6.57 Paragraph 127 within the NPPF stipulates that planning policies and decisions should always seek to secure a good standard of amenity for existing and future users of places. National guidelines for daylight and sunlight issues are contained within BRE guidelines. Regional and local policies refer to these guidelines as the accepted standard.
- 6.58 Draft London Plan Policy D9, which relates to tall buildings, states that wind, daylight, sunlight penetration and temperature conditions around buildings must be carefully considered and not compromise comfort and the enjoyment of open spaces around the building. Buildings should also not cause adverse reflected glare and should be designed to minimise light pollution from internal and external lighting.
- 6.59 At local level, LBWF Development Management Policy DM31 states that LBWF will consider the impact on privacy and amenity with adjacent properties, and the impact on microclimate for example wind, sun and reflection when considering proposals for tall buildings.

Daylight, Sunlight and Overshadowing

- 6.60 The application is supported with a full daylight/sunlight and overshadowing assessment prepared by Waldrams which presents an assessment of the likely daylight, sunlight and overshadowing effects of the Proposed Development on the existing surrounding properties and amenity areas. The report concludes that the Proposed Development will not give rise to any likely significant daylight, sunlight or overshadowing effects. It is therefore considered that the Proposed Development is acceptable in terms of daylight, sunlight and overshadowing impacts.

Noise

- 6.61 The Noise Assessment prepared by Noise Consultants, assesses the potential effects of noise on the proposed development and on existing sensitive receptors in the locality of the site. The assessment evaluates potential impacts upon the proposed residential development, and specifies design measures, including building envelope performance, required to achieve suitable noise levels within habitable rooms and external amenity areas.
- 6.62 The assessment concludes the suitable internal noise levels will be achieved throughout the development and comply with relevant British Standards. This will be supported with appropriate sound insulation delivered within the building envelope. Any such impacts will be addressed through appropriate planning conditions. The report also confirms that any noise generated by the development including operational plant will not impact on adjoining noise sensitive locations. These details will be secured by way of planning conditions.

Flood Risk

- 6.63 Paragraph 155 of the NPPF states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future).
- 6.64 Owing to the Site's location in Flood Zone 1, which indicates a low risk of tidal and fluvial flooding, it was agreed with LBWF that a flood risk was not required to support this application.

Air Quality

- 6.65 The air quality impacts associated with the proposed development have been assessed in line with the London Plan, that requires all developments to be Air Quality Neutral, alongside the LBWF policies contained within the Local Plan (CS13 & DM24) as well as the draft Local Plan policy 90.

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- 6.66 During the construction phase, a range of best practice mitigation measures will be implemented to reduce dust emissions, relevant to a medium risk construction site. The overall effect will therefore be 'not significant', and appropriate measures are set out in the AQA.
- 6.67 The AQA demonstrates that future residents of the proposed development will experience acceptable air quality without the need for mitigation, with pollutant concentrations below the air quality objectives.
- 6.68 The proposed development is car-free and will not generate additional traffic above recognised screening criteria and any impacts can be dismissed. Heating and hot water demand will be met by air source heat pumps, with no associated emissions to air. The proposed development will therefore have no significant effect on local air quality.
- 6.69 The proposed development has also been shown to meet the London Plan's requirements that new developments are 'air quality neutral'.
- 6.70 Overall, the construction and operational air quality effects of the proposed development have been shown to be 'not significant'.

7.0 DRAFT SECTION 106 HEADS OF TERMS

7.1 This section sets out a summary of the draft Heads of Terms for the Proposed Development and identifies where financial contributions could be made and where works 'in kind' are proposed in lieu of payment. The draft Heads of Terms have been considered in relation to the Planning Obligations SPD, which was adopted 16th May 2017.

7.2 It is envisaged that discussions relating to the following draft heads of terms and the Section 106 Agreement will continue with LBWF during the determination of the Application.

- Carbon Offsetting Payment – financial contribution;
- Air Quality Monitoring – financial contribution;
- CLP Monitoring - financial contribution;
- Epping Forest SAMMS - financial contribution;
- Epping Forest SANGS - financial contribution;

8.0 CONCLUSIONS

- 8.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires proposals to be determined in accordance with the Development Plan unless other material considerations indicate otherwise.
- 8.2 This Planning Statement has been prepared in support of an application for full planning permission for the comprehensive redevelopment of the Site to provide a high-quality residential development delivered alongside public realm enhancements.
- 8.3 This Statement assesses the Proposed Development against the Development Plan and other relevant national, regional and local planning policy. The proposals have been subject to a comprehensive consultation exercise involving regular pre-application meetings with officers from LBWF, and key consultees. The issues raised by these groups have been considered and incorporated in the development of the final proposals, where practicable.
- 8.4 Overall, the Site represents a rare opportunity to provide a significant quantum of new homes in a range of sizes and tenures on a key town centre site. The Proposed Development will create a landmark scheme which will also deliver significantly improved public realm enhancements.
- 8.5 It is considered that the Proposed Development is consistent with the broad objectives of planning policy and in accordance with the Government's overarching objectives for sustainable growth. As such, the Proposed Development is considered acceptable and should therefore be granted planning permission.