

## LONDON BOROUGH OF WALTHAM FOREST

Committee/Date:	Planning – 1 <sup>st</sup> April 2025
Application reference:	242498
Applicant:	J Wool Group Limited
Location:	806 High Road Leyton, Leyton E10 6AE
Proposed development:	<p>Demolition of the existing buildings on the site (bar the High Road Leyton facade) and the construction of three blocks of between 1 and 6 storeys and an infill property on William Street of 2.5 storeys comprising Purpose-Built Student Accommodation (Sui Generis) and commercial floorspace (Class E) with associated vehicle and cycle parking (including single storey cycle store), servicing, and landscaping.</p> <p><i>For the purposes of consultation only, the proposed development would comprise 261 bedspaces of purpose-built student accommodation (63 studio units and 198 en-suite rooms arranged in cluster flats) and 99m<sup>2</sup> commercial floorspace fronting onto High Road. The frontage to High Road of the former cinema will be retained.</i></p>
Wards affected:	Forest
Appendices:	None

### 1. RECOMMENDATION

- 1.1. That Planning Permission be **GRANTED** subject to conditions, informatives and completion of a S106 Agreement with the following Heads of Terms:

#### **Affordable Student Accommodation:**

- At least 35 per cent of the accommodation must be secured as affordable student accommodation (based on London Plan definitions). The affordable student accommodation bedrooms should be allocated by the higher education provider(s) that operates the accommodation, or has the nomination right to it, to students it considers most in need of the accommodation.
- The majority of the bedrooms in the development including all of the affordable student accommodation bedrooms are secured through a Nomination Agreement for occupation by students of one or more higher education provider.

**Marketing of Student Accommodation:**

- All student bedrooms to be marketed exclusively to University of Portsmouth (or any HEP should this change in future) between 1<sup>st</sup> September – 31<sup>st</sup> October each academic year before marketing the rooms on the open market.

**Accessibility:**

- Prepare a Wheelchair Accessible Marketing Strategy for the development that sets out how the wheelchair student accommodation will be promoted and advertised during the exclusivity period, to be agreed prior to commencement of development.
- The requirement for all wheelchair student rooms to be exclusively marketed between 1<sup>st</sup> September – 31<sup>st</sup> January each academic year.

**Employment and Training Strategy:**

- An Employment & Skills Plan.
- A financial contribution of £105,000.00 as compensation for the loss of existing employment space.
- Provide a minimum of 30% local labour, 14 apprentice posts in the construction trade during the construction phase of the development and 13 work placements in the construction phase of the development with such posts being first offered to local residents. In the event that obligations towards work placements and apprenticeships remain unfulfilled, then the developer must pay a default payment of £3,300.00 per work placement lost, towards employment training and business and £16,750.00 per apprenticeship post lost, towards employment, training, and business, to be used for residents, payable to the Council upon practical completion of the development.

**Highways and Public Realm:**

Enabling works will be required in line with the Outline and Detailed Construction Logistics Plan to include but not limited to:

- Reconstruction of the existing dropped kerb access to a construction standard crossover;
- Construction of a new dropped kerb and vehicle crossover to construction standards;
- Amendment to the existing TMO (Traffic Management Order) to install various parking suspensions to facilitate the construction crossover;
- Amendment to the existing TMO (Traffic Management Order) to install various parking suspensions along the construction route; and
- An enabling works application will be required to be submitted by the developer prior to commencement on site. The enabling works will be carried out by a Minor Highways Agreement and funded by the developer prior to commencement on site.

Highway works under a S278 will be required upon completion of the development, and prior to occupation. An application for highway works and the extent of works will include but not limited to:

- Renewal of the footway along the frontage of the site along St Heliers Road. Public realm improvements including trees and low level planting should be considered;
- Renewal of the footway along the frontage of the site along William Street;
- Renewal of the footway along High Road Leyton;
- The introduction of suitable street lighting to the new extended footway along St Heliers Road;
- Changes to the existing parking provision along St Heliers Road with extension of existing CPZ parking bays;
- The installation of Highway approved crossovers that meet the existing crossover standards; and
- Removal of all enabling works required for construction.

#### Other Highways

- A S106 contribution of £11,000.00 is required towards Construction Logistics Plan monitoring.
- A S106 contribution of £75,000.00 is required towards safety improvement for walking and cycling in line with TfL's Healthy Streets for London objectives, improving road safety and connectivity for the new occupants of this site.
- The site will be car-free with the exception of one disabled parking space. The development / occupiers will not be entitled to parking permits for any CPZ in the borough.

#### **Sustainability:**

- A financial contribution of £49,619.00 (based on offset rate of £95.00 per tonne over 30 years) towards a carbon offset fund (COF) should be made prior implementation. This financial contribution will need re-calculation after the strategy has been updated to account for the requirements to consider a connection (Second COF payment).
- Second COF payment.
- Connection ready.
- Updated Energy Statements on commencement and completion based on "As Built" energy calculations.

**Air Quality:**

- A financial contribution of £8,300.00 towards implementation of the Air Quality Action Plan.

**Trees:**

- A financial contribution of £3,866.66 for an increased regime maintenance to 3 years.
- Payment of CAVAT value of £35,317.00 in the case of the loss or removal of single tree (Council trees Ref: 9812) as a result of the demolition, construction or operation phases of the development.
- Payment of CAVAT value of £28,976.00 in the case of the loss or removal of single tree (Council trees Ref: 9809) as a result of the demolition, construction or operation phases of the development.
- Any accidental damage or loss of any other off-site trees on St Heliers Road during the construction process shall be mitigated via respective CAVAT financial contributions.

**Biodiversity Net Gain (BNG)**

- To register the site on the Biodiversity Gain Site Register.
- To complete the Habitat Creation and Enhancement Works at the application site in accordance with the Habitat Management and Monitoring Plan.
- To provide Management Plan Monitoring Reports to the Council for either on-site provision or biodiversity off setting scheme
- Financial contribution towards BNG monitoring, over periods including year 1, 2, 5, 10, 20 and 30 for either on-site provision or biodiversity off setting scheme.
- Any shortfall or failure to deliver 10% uplift on site, will require either of the following options to be taken up via either Biodiversity Offsetting scheme or statutory biodiversity credits.

**Epping Forest Special Area of Conservation (SAC):**

- A financial contribution of £104.00 per bedspace towards Strategic Access Management and Monitoring Strategy (SAMMS) with a total of £67,600.00 based on 261 bedspaces.

**Architects:**

- The architects of the approved drawings or any suitably qualified architect to the satisfaction of the LPA shall be retained throughout the construction phase of the development.

**Legal Fees:**

- Payment of the Council's legal fees for the preparation and completion of the Legal Agreement.

**Monitoring Fee:**

- Payment of 5% of the total amount of financial contributions towards monitoring, implementation, and compliance with the S106 Agreement.

- 1.2. That authority to be given to the Assistant Director – Development Management and Building Control in consultation with the Council's Legal Services for the sealing of the S106 Agreement and to agree any minor amendments to the conditions or the legal agreement on the terms set out above.
- 1.3. In the event the S106 Agreement is not completed within a reasonable timeframe following the date of Planning Committee, the Assistant Director – Development Management and Building Control is hereby authorised to refuse the application. In the absence of this S106 Agreement, the proposed development would not be able to deliver the development on the site.

**REASONS REFERRED TO PLANNING COMMITTEE**

- 1.4. The case has been referred to Planning Committee for the following reasons:
  - At the request of the Chair of Planning Committee;
  - Nature of the proposal; and
  - Scale of development.

**2. SITE AND SURROUNDINGS**

- 2.1. The application site is 0.33 hectares in size with a triangular shape with two protruding plots; the north protruding plot faces onto William Street, and the south-east protruding plot faces onto High Road Leyton. The High Road Leyton frontage is a former cinema building, and its ground floor currently has a furniture shop and nursery. The site's south-west part sits behind the row of buildings facing High Road Leyton; all have a commercial element to the ground floor, and some have flats on upper floors. The north-west sits behind the private rear gardens of dwellinghouses facing William Street, the east side of the site comprises a wide frontage on St Heliers Road, its bottom part sits adjacent to the Leyton Green Tower, a ten-storey residential building that rises above the road.

- 2.2. The site currently comprises a large former cinema building and a car parking area for approximately 30 vehicles accessed from St Heliers Road. The former cinema building comprises a series of business spaces, part of which had a children's nursery. The car park is used for a car rental service.



Figure 1: Site Location Plan

- 2.3. The rear of the site is within walking distance of secondary and primary shopping frontages, providing retail, supermarkets, restaurants, health, commercial and health services. It is also adjacent to a bus stop with nine services and sits within approximately 600 metres distance from Leyton Midland Road Overground station. As such, the site has a Public Transport Accessibility Level (PTAL) of 5 / 6a, which means it has very good / excellent access to public transport.
- 2.4. The site lies within an area of known archaeological potential for the historic settlement of Leyton; it is also adjacent to the Archaeological Priority Area for the projected Roman road that runs through Leyton. The site is not within a conservation area however, it sits approximately 100 metres from the Bakers Arms Conservation Area, opposite the Grade II listed 807 Leyton High Road, and approximately 50 metres from the locally listed William IV Public House. Additionally, the cinema building is a non-designated asset where its art deco frontage has a strong townscape presence.
- 2.5. The site is in the Waltham Forest Air Quality Management Area, which covers the entire Borough and is understood to be in place mainly due to vehicle emissions.
- 2.6. The site sits within Flood Zone 1, meaning it has a very low risk of flooding however, it is located within a Critical Drainage Area (CDA) and has a 100% impermeable surface.

There are no nearby ecological designations, though the site falls within the 0-3km Zone of Influence for Epping Forest Special Area of Conservation.

- 2.7. The site falls within the Bakers Arms Strategic Location and District Centre and frontage on the High Road is a Secondary Shopping Frontage. The site is identified in the draft Local Plan Part 2 Site Allocations, R19056.

### **3 APPLICATION PROPOSAL**

- 3.1 This proposal is for: Demolition of the existing buildings on the site (bar the High Road Leyton facade) and the construction of three blocks of between 1 and 6 storeys and an infill property on William Street of 2.5 storeys comprising Purpose-Built Student Accommodation (Sui Generis) and commercial floorspace (Class E) with associated vehicle and cycle parking (including single storey cycle store), servicing, and landscaping. *For the purposes of consultation only, the proposed development would comprise 261 bedspaces of purpose-built student accommodation (63 studio units and 198 en-suite rooms arranged in cluster flats) and 99m<sup>2</sup> commercial floorspace fronting onto High Road. The frontage to High Road of the former cinema will be retained.*
- 3.2 Further, the proposals comprise:
- A mixed-use block fronting High Road Leyton – This block sits between 808 and 796 High Road Leyton and rises to 5 storeys in height. It retains the façade of the existing building, albeit with some modifications to allow for development behind. It includes a new 99sqm GIA commercial unit at ground floor (Use Class E) with four clusters comprising 30 en-suite student bedrooms above (Sui Generis).
  - Two blocks in the rear part of the site – These blocks are positioned in an 'L-shape' fronting St Heliers Road. Block A rises to 5 storeys in height (with a basement) comprising 98 student bedrooms (Sui Generis) across 27 studios and nine clusters comprising 71 student en-suite bedrooms. Block B rises to 6 storeys in height comprising 129 student bedrooms (Sui Generis) across 36 studios and 11 clusters comprising 93 student bedrooms. Both Blocks include internal amenity space (Block A at basement level and Block B at ground floor level).
  - A single infill property fronting William Street – This 2.5 storey property sits between 16 and 20 William Street and completes the existing gap in the terrace, comprising four en-suite student bedrooms (sui generis).
- 3.3 The proposed development is for 261 student bedrooms (split between 57 studios and 26 clusters containing 204 bedrooms) as well as the 99sqm GIA commercial unit. A total of 12 of the student bedrooms are designed to M4(2) wheelchair adaptable standards and a total of 12 bedrooms are designed to M4(3) wheelchair accessible standards. The proposals also include 35% affordable student housing provision in line with policy requirements.

#### 4 RELEVANT SITE HISTORY

##### 4.1 Planning History for the Site:

REFERENCE	DESCRIPTION OF DEVELOPMENT	DECISION DATE
213777	Retention of High Road facade and the demolition of existing buildings on site; construction of three blocks at five and six storeys height comprising a commercial space (Class E) fronting High Road Leyton and 83 residential flats, associated vehicle and cycle parking, servicing and landscaping; and the construction of a two-storey dwellinghouse fronting William Street.	Granted 31 <sup>st</sup> March 2023
231266	Non-Material Amendment to planning permission reference 213777 granted 31/03/23 to allow for inclusion of a second lift within Block B together with internal reconfiguration, extra lift overrun at roof level and alterations to one window at fifth floor eastern elevation.	Granted 8 <sup>th</sup> August 2023
231086	Non-Material Amendment to planning permission reference 213777 granted 31/03/23 to allow rewording the development description from “ <i>Retention of High Rd façade...</i> ” to “ <i>Replacement of High Rd façade...</i> ”.	Withdrawn

##### 4.2 Pre-Application:

Reference	Description of Development	Issue Date
PRE_24_0169	Redevelopment of the site to provide 261 purpose-built student accommodation (PBSA) bedspaces with an arrangement split of 204 cluster bedrooms (78%) to 57 studios (22%). The scale, massing and siting of the building would be similar to that of the residential led development that has previously been approved under the scope of planning permission 213777.	21 <sup>st</sup> June 2024

##### 4.3 Planning Enforcement:

No relevant planning enforcement investigations.

##### 4.4 Planning History of Neighbouring Sites:

No relevant planning history of neighbouring sites.



## 5.0 Consultations

### 5.1 Public Consultation

5.2 Consultation to residents on this planning application was carried out on 16<sup>th</sup> December 2024. 303 addresses were notified on:

- Atkins Rd;
- Belmont Park Rd;
- High Rd Leyton;
- Leyton Green Rd (Leyton Green Tower);
- St Heliers Rd; and
- William St.

5.3 Three site notices were displayed on 17<sup>th</sup> December 2024; on High Road Leyton, William Street and St Heliers Road. The application was advertised in East London & West Essex Guardian on 19<sup>th</sup> December 2024. One representation from the public consultation was received with comments to the proposed development:

Representations Received	Response
Concerns around the boundary of the site to adjoining residents regarding noise, security and privacy.  Avoid congregation in areas around the site disturbing residents with excess noise and anti-social behaviour.	A planning condition is recommended requiring details of boundary walls and fences as part of any planning permission.  Noise and the control of ASB would be subject to Environmental Health regulations and the Police respectively although mitigation of this could be achieved through the design of amenity space and landscaping for future occupiers of the proposed development to enjoy.

### 5.4 Other Consultation

### 5.5 Internal and External Representations Received

5.6 Responses received from Waltham Forest Council consultees:

LBWF Consultees	Comments
Place & Design & Planning Policy	No objection following amendments to address potential harm to the art deco façade to: <ul style="list-style-type: none"> <li>• Remove the lancet windows, and see the restoration of the existing fluted tilework; and</li> <li>• Retain the existing parapet and distinctive fins / ribs to form the balustrade to the terrace</li> </ul>

	associated with the additional setback storey.
Highways	No objection subject to conditions and S106 Heads of Terms as highlighted at Section 1 of this report.
Transport Policy	No response received at the time of writing however, condition is recommended regarding cycle parking provision.
Energy & Sustainability	<p>No objection subject to BREEAM and 35% carbon dioxide emissions reduction conditions and S106 Heads of Terms to secure:</p> <ul style="list-style-type: none"> <li>• A financial contribution of £49,619.00 towards a Carbon Offset Fund. Payable upon implementation;</li> <li>• Second COF payment;</li> <li>• Connection Ready; and</li> <li>• Updated Energy Statements on commencement and completion based on "As Built" energy calculations.</li> </ul>
Environmental Health	No objection subject to conditions relating to air quality and land contamination. Noise Impact Assessment secured as a condition to any planning permission.
Building Control	A Demolition Notice to the Council will be required for the proposed demolition, a Building Regulations application will be required for the proposed development, if any floor of the proposed development will be more than 18 metres above ground level. A Building Regulations application through the Building Safety Regulator will be required and consultation will be required with London Fire Brigade and the Council's Highways section (regarding storage and collection of waste).
Regeneration	No response received at the time of writing report.
Parks & Open Spaces	No response received at the time of writing report.
Waste & Recycling (Highways)	The applicant has confirmed that a private company will be utilised to service the site as opposed to the Council's waste service. This provides more flexibility on collection days and times however, the Council's Waste Team have reviewed their standards in light of both the Climate Change

	Emergency and Vision Zero targets. Where private collection is utilised, they urge private developers not to design in such a way that increases vehicle trips and servicing throughout the week. This is particularly important given that the frontage of the site is along a narrow (no through route) residential road. Details to be secured as a condition to any planning permission.
Public Health	No response received at the time of writing report.
Tree Preservation and Urban Greening	<p>The proposal is supported in principle, subject to the imposition of planning conditions:</p> <ul style="list-style-type: none"> <li>• Arboricultural Method Statement;</li> <li>• Soft landscaping;</li> <li>• Habitat management and monitoring plan; and</li> <li>• Habitat enhancement details.</li> </ul>
Employment Business and Skills	<p>Recommend S106 Heads of Terms as set out at Section 1 of this report:</p> <ul style="list-style-type: none"> <li>• 30% local labour;</li> <li>• 14 apprenticeships; and</li> <li>• 13 work placements.</li> </ul> <p>In the event that obligations towards work placements and apprenticeships remain unfulfilled, then the developer must pay a default payment of £3,300.00 per work placement lost, towards employment training and business and £16,750.00 per apprenticeship post lost, towards employment, training, and business, to be used for residents, payable to the Council upon practical completion of the development.</p>

#### 5.7 Responses received from external and statutory consultees:

External Consultation	Comments
Historic England Archaeology – Greater London Archaeological Advisory Service (GLAAS)	No objection subject to archaeology conditions and informatives.
Environment Agency	No comment to make on the application. There are no constraints for comment on regarding this application.

Crossrail Transport for London	No comment to make on the application.
Theatres Trust	No comment to make on the application.
The National Amenity Societies - The Waltham Forest Civic Society	No response received at the time of writing report.
The National Amenity Societies - The Victorian Society	No response received at the time of writing report.
The National Amenity Societies - The Twentieth Century Society	No response received at the time of writing report.
The National Amenity Societies - The Society for the Protection of Ancient Buildings	No response received at the time of writing report.
The National Amenity Societies - The Council for British Archaeology	No response received at the time of writing report.
The National Amenity Societies - The Ancient Monuments Society	No response received at the time of writing report.
NHS North East London Clinical Commissioning Group	No response received at the time of writing report.
Natural England	Having considered the assessment, and the measures proposed to mitigate for all identified adverse effects likely to occur as a result of the proposal, Natural England advises that we concur with the assessment conclusions. If all mitigation measures are appropriately secured, we are satisfied that there will be no adverse impact on the sites from recreational pressure.
London Fire Brigade	No comment received at the time of writing report.
Active Travel England	Given the role of Transport for London (TfL) in promoting and supporting active travel through the planning process, Active Travel England (ATE) will not be providing detailed comments on development proposals in Greater London at the current time.
Health & Safety Executive – Tall Buildings	No comment to make on the application. Would consider proposal under Planning Gateway One if proposal is more than 18m, (which it would not be).
Thames Water	No objection subject to conditions and informatives.
Metropolitan Police Service (Designing Out Crime Officer)	Recommend condition seeking Secured by Design certification.
Transport for London	No objection. Not referable to the Mayor of London.

## **6. DEVELOPMENT PLAN**

- 6.1 The NPPF Section 70(2) of the Town and Country Planning Act (1990) (as amended) sets out that in considering and determining applications for planning permission, the Local Planning Authority (LPA) must have regard to considerations including the provisions of the development plan and any local finance considerations, so far as material to the application, and any other material considerations.
- 6.2 Section 38(6) of the Planning and Compulsory Purchase Act (2004) makes it clear that “if regard is to be had to the development plan for the purpose of any determination to be made under the Planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise”.
- 6.3 The Development Plan for the site, at the time of this report, comprises the London Plan (2021) and the Waltham Forest Local Plan LP1 (2024). The NPPF does not change the legal status of the Development Plan.

### The London Plan (2021)

- 6.4 The London Plan is the overall strategic plan for London and it sets out a fully integrated economic, environmental, transport and social framework for the development of the capital from 2019 to 2041. The relevant policies within the London Plan (2021) relevant to this application are considered to include but not limited to:
- GG1 – Building strong and inclusive communities
  - GG2 – Making the best use of land
  - GG5 – Growing a good economy
  - SD10 – Strategic and local regeneration
  - D1 – London’s form, character, and capacity for growth
  - D2 – Infrastructure requirements for sustainable densities
  - D3 – Optimising site capacity through design-led approach
  - D4 – Delivering good design
  - D5 – Inclusive design
  - D6 – Housing quality and standards
  - D7 – Accessible housing
  - D8 – Public realm
  - D11 – Safety, security, and resilience to emergency
  - D12 – Fire safety
  - D13 – Agent of change
  - D14 – Noise
  - H4 – Delivering affordable housing
  - H5 – Threshold approach to applications
  - H15 – Purpose-built student accommodation
  - HC1 – Heritage, conservation, and growth
  - G5 – Urban greening
  - G6 – Biodiversity and access to nature
  - SI 1 – Improving air quality
  - SI 2 – Minimising greenhouse gas emissions
  - SI 3 – Energy infrastructure
  - SI 4 – Managing heat risk
  - SI 5 – Water infrastructure
  - SI 7 – Reducing waste and supporting the circular economy

- SI 8 – Waste capacity and net waste self-sufficiency
- SI 12 – Flood risk management
- SI 13 – Sustainable drainage
- T1 – Strategic approach to transport
- T2 – Healthy streets
- T4 – Assessing and mitigating transport impact
- T5 – Cycling
- T6 – Car parking
- T7 – Deliveries, servicing, and construction
- DF1 – Delivery of the plan and planning obligations
- M1 – Monitoring

#### Waltham Forest Local Plan LP1 (2024)

6.5 The draft version of the Local Plan underwent Regulation 18 public consultation between July 2019 and September 2019 and consultation on the proposed submission version between 26<sup>th</sup> October 2020 and 14<sup>th</sup> December 2020. It underwent examination and consultation on proposed modifications concluded on 21<sup>st</sup> September 2023. The Waltham Forest Local Plan (LP1) was subsequently adopted on 29<sup>th</sup> February 2024 and therefore now forms a key part of the development plan in determining all planning applications. The previous Core Strategy (2012) and Development Management Policies (2013) are superseded by LP1.

6.6 The relevant policies are:

- Policy 1 Sustainable Development and Mixed-Use Development
- Policy 2 Scale of Growth
- Policy 3 Infrastructure for Growth
- Policy 4 Location of Growth
- Policy 5 Management of Growth
- Policy 6 Ensuring Good Growth
- Policy 7 Encouraging Mixed Use Development
- Policy 9 South Waltham Forest
- Policy 13 Delivering Genuinely Affordable Housing
- Policy 18 Other Forms of Housing
- Policy 24 Supporting Economic Growth
- Policy 33 Local Jobs, Skills, Training and Procurement
- Policy 35 Promoting Culture and Creativity
- Policy 39 New Retail, Office and Leisure Developments
- Policy 44 Evening and Night-Time Economy Uses
- Policy 50 Noise, Vibration and Light Pollution
- Policy 53 Delivering High Quality Design
- Policy 55 Building Heights
- Policy 57 Amenity
- Policy 58 Making Places Safer and Designing Out Crime
- Policy 60 Promoting Sustainable Transport
- Policy 61 Active Travel
- Policy 62 Public Transport
- Policy 63 Development and Transport Impacts
- Policy 64 Deliveries, Freight and Servicing
- Policy 65 Construction Logistic Plans

- Policy 66 Managing Vehicle Traffic
- Policy 67 Electric Vehicles
- Policy 68 Utilities Infrastructure
- Policy 70 Designated Heritage Assets
- Policy 71 Listed Buildings
- Policy 73 Archaeological Assets and Archaeological Priority Areas
- Policy 74 Non-Designated Heritage Assets
- Policy 75 Locally Listed Heritage Assets
- Policy 77 Green Infrastructure and the Natural Environment
- Policy 79 Biodiversity and Geodiversity
- Policy 80 Trees
- Policy 81 Epping Forest and the Epping Forest Special Area of Conservation
- Policy 85 A Zero Carbon Borough
- Policy 86 Decentralised Energy
- Policy 87 Sustainable Design and Construction
- Policy 88 Air Pollution
- Policy 89 Water Quality and Water Resources
- Policy 90 Contaminated Land
- Policy 91 Managing Flood Risk
- Policy 92 Overheating
- Policy 93 Waste Management
- Policy 94 Infrastructure and Developer Contributions

## **7. MATERIAL PLANNING CONSIDERATIONS**

### National Planning Policy Framework (2024)

- 7.1 The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these are expected to be applied. It is a material consideration in planning decisions. It contains a presumption in favour of sustainable development, described as at the heart of the framework.
- 7.2 For decision-taking the NPPF states that the presumption means *"approving development proposals that accord with an up-to-date development plan without delay"* and where there are no relevant development plan policies, or the policies which are most important for determining the application are out of date, granting permission unless *"...any adverse impacts would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination"*.
- 7.3 The NPPF gives a centrality to design policies; homes should be locally led, well-designed, and of a consistent and high-quality standard. Local planning authorities (LPAs) are to make sure that the quality of approved developments does not materially diminish 'between permission and completion, as a result of changes being made to the permitted schemes.
- 7.4 The specific policy areas of the NPPF considered to be most relevant to this application:
- Building a strong, competitive economy
  - Ensuring the vitality of town centres
  - Promoting healthy and safe communities

- Promoting sustainable transport
- Making effective use of land
- Achieve well-designed places
- Conserving and enhancing the natural environment
- Conserving and enhancing the historic environment

Waltham Forest Local Plan (LP2) – Site Allocations (Proposed Submission):

- 7.5 The Site Allocations Document (Draft Waltham Forest Local Plan Part 2: Site Allocations Document (2021 – Reg 19) seeks to ensure that the London Borough of Waltham Forest promotes the right development in the right places at the right scale, creating attractive sustainable neighbourhoods as well as economic opportunities. The Council is in the process of preparing Local Plan Part 2: Site Allocations (LP2). The document has been subject to 2 public consultations, and the Council held a further statutory consultation on the document between 6<sup>th</sup> August 2024 and 9<sup>th</sup> October 2024.
- 7.6 When adopted, the Site Allocations Document will represent Part 2 of the Council's Local Plan. This will complement the Waltham Forest Local Plan LP1 (2024).

Mayor's Purpose-built Student Accommodation LPG (October 2024)

- 7.7 The Purpose-built Student Accommodation (PBSA) London Plan Guidance (LPG) provides guidance primarily to support London Plan Policy H15. The guidance falls in two parts:
- The role of PBSA as part of mixed and inclusive neighbourhoods, and how to optimise its impact on policy objectives; and
  - Expectations around nominations agreements, and how these relate to alignment with housing need.

Mayor's Housing Design Standards LPG (June 2023)

- 7.9 The Housing Design Standards guidance brings together, and helps to interpret, the housing-related design guidance and policies in the London Plan.

London Plan Affordable Housing and Viability SPG (2017)

- 7.10 This supplementary planning guidance (SPG) focuses on affordable housing and viability. It includes four distinct parts: background and approach; the threshold approach to viability assessments and detailed guidance on viability assessments.

London Plan the Sustainable Design and Construction SPG (April 2014)

- 7.11 The Mayor published SPG on sustainable design and construction.

Mayor's Housing SPG (March 2016)

- 7.12 This document provides guidance on a range of strategic policies including housing supply, residential density, housing standards, build to rent developments, student accommodation and viability appraisals.



Mayor's 'Be Seen' energy monitoring guidance LPG (September 2021)

- 7.13 This guidance explains the process that needs to be followed to comply with the 'be seen' post-construction monitoring requirement of Policy SI 2 of the London Plan.

Mayor's Fire Safety LPG (February 2022)

- 7.14 The Fire Safety LPG reiterates that the fire safety of developments needs to be considered from the outset.

Mayor's Urban Greening Factor LPG (February 2023)

- 7.15 The guidance helps support boroughs and applicants in meeting the requirements of policy G5. It provides guidance to boroughs to inform the local application of the policy and information to help applicants to apply the UGF to proposed developments.

Mayor's Air Quality Positive LPG (February 2023)

- 7.16 The guidance provides support to the Air Quality Positive approach by identifying and implementing ways to push development beyond compliance with both the Air Quality Neutral benchmarks and the minimum requirements of an air quality assessment.

Mayor's Circular Economy Statements LPG (March 2022)

- 7.17 The London Plan Guidance Circular Economy Statements puts circular economy principles at the heart of designing new buildings, requiring buildings that can more easily be dismantled and adapted over their lifetime.

Mayor's Whole Life-Cycle Carbon Assessments LPG (March 2022)

- 7.18 This guidance explains how to prepare a Whole Life-Cycle Carbon (WLC) assessment in line with Policy SI 2 F of the London Plan 2021 using the WLC assessment template.

Mayor's Air Quality Neutral London Plan Guidance (February 2023)

- 7.19 This guidance sets out the benchmarks for an Air Quality Neutral development.

Waltham Forest - Affordable Housing & Viability SPD (2018)

- 7.21 This supplementary planning document (SPD) has been prepared to provide further detailed guidance on affordable housing and viability. The document provides further guidance on how the Council will take viability into account when considering planning applications and what supporting information applicants will be required to produce. The Council does not intend to apply this guidance retrospectively to any planning applications being processed or determined.

Waltham Forest - Planning Obligations SPD (2017)

- 7.22 This document seeks to provide transparent, clear, and consistent information for the negotiation of planning contributions and S106 Agreements and how these work

alongside the Community Infrastructure Levy (CIL) to help deliver necessary infrastructure in the Borough.

Waltham Forest - Waste & Recycling Guidance for Developers (2019)

- 7.23 The Waste & Recycling Guidance for Developers is to help those involved in designing new developments to ensure safe and secure refuse and recycling storage and collection.

Local Finance Considerations

- 7.24 Local Finance Considerations can include either a grant that has been or would be given to the Council from central government or money that the council has received or will or could receive in terms of CIL. It is noted that:
- It is not thought that there are any grants which have been or will or could be received from central government in relation to this development.
  - The Council expects to receive income from LBWF CIL in relation to this development.
  - The Council expects to receive income from Mayoral CIL in relation to this development.

Department for Communities and Local Government Technical Housing Standards – Nationally Described Space Standard (2015)

- 7.25 This standard deals with internal space within new dwellings and is suitable for an application across all tenures. It sets out requirements for the Gross Internal (floor) Area of new dwellings at a defined level of occupancy as well as floor areas and dimensions for key parts of the home, notably bedrooms, storage and floor to ceiling height.

BRE Guidance – Site layout planning for daylight and sunlight – A guide to good practice (2022)

- 7.26 This guide gives advice on site layout planning to achieve good sunlighting and daylighting, both within buildings and in the open spaces between them. It is intended to be used in conjunction with the interior daylight recommendations for new buildings in the British Standard Daylight in buildings, BS EN 17037.

## **8 ASSESSMENT**

- 8.1 The main issues relate to the following:
- A. Principle of Development and Land Use
  - B. Affordable Student Accommodation
  - C. Standard of Accommodation
  - D. Design and Townscape
  - E. Transport, Highways and Servicing
  - F. Trees, Landscaping and Ecology
  - G. Energy Efficiency and Sustainable Design and Construction

- H. Flood Risk and Drainage
- I. Environmental Impact
- J. Safety and Security
- K. Planning Obligations

**A) PRINCIPLE OF DEVELOPMENT AND LAND USE**

- 8.1 National Planning Policy Framework (NPPF) (2024) places a presumption in favour of *“sustainable development” and states that there should be a “golden thread”* running through plan and decision making. These principles are reflected in Policy 1 of Policy GG1 of the London Plan (2021) and Policy 1 of the Waltham Forest Local Plan LP1 (2024).
- 8.2 Policy D2 of the London Plan (2021) sets out that development densities should be proportionate to a site’s connectivity and accessibility by walking, cycling, and public transport to jobs and services. It also generally requires that suitable levels of infrastructure are or will be in place to support the density of developments being proposed.
- 8.3 Policy D3 of the London Plan (2021) states that all development must make the best use of land by following a design-led approach that optimises the capacity of sites. It does not set out a prescriptive approach but rather seeks to ensure that all schemes achieve an appropriate density that responds to a site’s context and capacity for growth, setting out considerations relating to form and layout, user experience, and quality and character.
- 8.4 Policy H1 of the London Plan (2021) aims to increase housing supply and sets the ten years targets for net housing completion that each planning authority should plan for. Paragraph 4.1.9 of this policy states that net non-self-contained accommodation for students should count towards meeting housing targets on the basis of a 2.5:1 ratio, with two and a half bedrooms/units being counted as a single home.
- 8.5 Policy H3 of the London Plan (2021) states that to ensure housing targets are achieved, boroughs should optimise the potential for housing delivery on brownfield sites, especially the sites with existing or planned PTALs 3-6, located within 800 metres distance of a station or a town centre boundary.
- 8.6 Policy 18 of the Waltham Forest Local Plan LP1 (2024) states that non-traditional housing can make a positive contribution to providing a wider range of housing choices for residents, meeting identified needs and contributing to increasing housing supply. Waltham Forest defines non-traditional housing as Build to Rent, Purpose-Built Student Accommodation and Purpose-Built Shared Living.

Loss of Existing Employment Floorspace

- 8.7 The acceptability of the loss of the existing employment floorspace at the site has been established through the extant planning permission Ref. 213777. This permission secured a financial contribution of £105,000.00 to the Council as compensation for the loss of the existing employment floorspace. Accordingly as with this application, it is recommended that the same contribution will be secured to address the loss of employment floorspace.

Loss of Nursery Floorspace

- 8.8 The acceptability of the loss of the existing nursery floorspace at the site has been established through the extant planning permission Ref. 213777. It is considered no further review of this is required.

High Road Leyton Commercial Unit

- 8.9 The site includes a small commercial unit on the ground floor of the historic cinema entrance, fronting onto High Road Leyton. The proposed development would result in a similar-sized new commercial unit of 99sqm in its place, proposed as Class E. This would present an attractive offer to the Bakers Arms District Centre by attracting more shoppers and visitors to the centre through this enhanced offer.

Purpose-Built Student Accommodation

- 8.10 A PBSA Needs Assessment was submitted as part of this application to demonstrate the requirement for such use. The Assessment found that 56% of Waltham Forest's resident students are required to rely on the Private Rented Sector (PRS) due to a lack of suitable PBSA supply in the market area. Also, the Assessment concluded that there is a ratio of 2.4 full-time international students in the borough to PBSA beds available, demonstrating a significant shortfall of accommodation for the borough's international student residents.
- 8.11 The Assessment also found that 10,990 students lived in Waltham Forest in the 2021/22 academic year and the number of full-time students has been increasing rapidly in the borough with figures rising 70% since 2016/17. 9,460 of the 2021/22 academic year population were full-time students, which was the highest student population ever in the borough.
- 8.12 The Assessment further states that currently, over 6,000 full-time students are unable to access student accommodation, with a full-time student to bed ratio of 10.8. With a lack of dedicated student housing, students could typically make up around 20-25% of Build to Rent and co-living renters, although some instances show students comprise up to 50% or more of the populations in these alternate types of accommodation.
- 8.13 In summary, it is clear that the application site is well-suited for PBSA uses, being in close proximity to several London campus', the closest being the University of Portsmouth Walthamstow Campus only c.1km north of the site. There is an identifiable shortfall of PBSA beds in the borough and the local area more specifically, and this is causing a surging demand across other accommodation sectors such as PRS, BTR and co-living products from students to find accommodation, which is having resultant impacts upon the supply of housing for non-student renters, causing shortfalls across the wider housing markets in the borough. The delivery of 261 high-quality student beds in this sustainable location is justified.
- 8.14 The draft Local Plan Part 2 site allocations identifies that this site may be suitable for provision of high quality, sustainable, accessible PBSA, including affordable student accommodation. PBSA in the borough is expected to have a nomination agreement for occupation by students of one or more higher education provider, with priority being given to University of Portsmouth, The site allocation suggests an indicative capacity of 490 PBSA rooms within the Bakers Arms Strategic Location.

Extant Planning Permission for C3-Led, Mixed Use

- 8.15 The principle of residential accommodation was considered acceptable under the extant planning permission Ref: 213777, which secured 83 homes (use class C3). Policy 18 of the Waltham Forest Local Plan LP1 (2024) defines PBSA as another form of housing. In considering that residential use was supported by the previous consent, this proposal for another form of housing in PBSA is considered acceptable in principle and in land use terms, notwithstanding PBSA use class as sui generis.

**B) AFFORDABLE STUDENT ACCOMMODATION**

- 8.16 Policy H4 of the London Plan (2021) sets out a strategic target for the provision of 50% of new homes as affordable, listing specific measures intended to achieve this aim, including threshold approach and the use of grant to increase provision beyond normally achievable levels.
- 8.17 Policy H5 of the London Plan (2021) states fast tracked applications are not required to provide a viability assessment at application stage.
- 8.18 Policy H15 of the London Plan (2021) states that the maximum level of accommodation is secured as affordable student accommodation as defined through the London Plan and associated guidance, and at least 35 per cent of the accommodation must be secured as affordable student accommodation or 50 per cent where the development is on public land to follow the Fast Track Route (FTR). Adding that the affordable student accommodation bedrooms should be allocated by the higher education provider(s) (HEP) that operates the accommodation, or has the nomination right to it, to students it considers most in need of the accommodation.
- 8.19 The application proposes to follow the FTR and provide 35% of the accommodation as affordable student accommodation. The S106 would include nominations and obligations for the affordable student accommodation, to ensure that the HEP would be allocating these bedrooms.
- 8.20 Paragraph 4.15.8 of the London Plan states that the definition of affordable student accommodation is a PBSA bedroom that is provided at a rental cost for the academic year equal to or below 55 per cent of the maximum income that a new full-time student studying in London and living away from home could receive from the Government's maintenance loan for living costs for that academic year. The actual amount the Mayor defines as affordable student accommodation for the coming academic year is published in the Mayor's Annual Monitoring Report.
- 8.21 Paragraph 4.15.10 adds that the rent charged must include all services and utilities, which are offered as part of the package for an equivalent non-affordable room in the development. There should be no additional charges specific to the affordable accommodation.
- 8.22 Paragraph 4.15.11 confirms that the initial annual rental cost for the element of affordable accommodation should not exceed the level set out in the Mayor's Annual Monitoring Report for the relevant year.

FLOOR LEVEL	EN SUITE 13.5sqm
G/F	10
1/F	24
2/F	24
3/F	15
4/F	15
5/F	3
<b>TOTAL</b>	<b>91</b>

*Table 1: Affordable Student Rooms*

- 8.23 All of the affordable student rooms would comprise an en suite of 13.5sqm. Considering the above 91 affordable rooms, which equates to a 35% level of affordable student accommodation, and in compliance with policy, officers support the proposals and planning obligations would secure the delivery of this, following the FTR. Officers recommend planning obligations to secure an early-stage viability review mechanism in the event the development is not built within two years of planning permission or otherwise agreed under the terms of the S106 Agreement. Accordingly, the overall quantum of affordable student accommodation would be acceptable, subject to planning obligations. As such, the proposed development would comply with Policies H4, H5 and H15 of the London Plan (2021) and Policy 18 of the Waltham Forest Local Plan LP1 (2024).

## **C) STANDARD OF ACCOMMODATION**

### Rooms and Amenity

- 8.24 Policy H15 of the London Plan (2021) states that PBSA must provide functional living spaces and layout.
- 8.25 The Mayor's Purpose-built Student Accommodation LPG (October 2024) also states that internal and external communal amenity space (only accessible to students, additional to living rooms), commensurate with the number of students, should be provided. The LPG further states that the distribution of such space should consider the balance between the need to avoid it being dominated by students from any one part of the building, ease of access, and the potential for larger / more concentrated spaces to feel intimidating and overwhelming.
- 8.26 Policy 18 of the Waltham Forest Local Plan LP1 (2024) states that PBSA should provide some common / communal facilities and / or services, however, does not provide bespoke amenity space standards for PBSA.
- 8.27 Policy 56 of the Waltham Forest Local Plan LP1 (2024) states that amenity space should be appropriately located and usable.
- 8.28 The proposed development comprises 261 student bedrooms (use class Sui Generis) with a mix of studios and en-suite bedrooms within clusters. The proposed mix is set out as follows:
- 63 studio bedrooms (24%); and
  - 25 clusters (ranging from 5-9 bedrooms) comprising 198 bedrooms (76%).

	<b>OVERALL ACCOMMODATION TYPE</b>			
	EN SUITE 13.5sqm	STUDIO 18sqm	STUDIO 23sqm	STUDIO 25sqm
<b>NO. OF ROOMS</b>	198	34	13	16
<b>TOTAL</b>	<b>261</b>			

Table 2: Student Accommodation Type

	<b>ACCOMMODATION TYPE (BLOCK A)</b>			
	EN SUITE 13.5sqm	STUDIO 18sqm	STUDIO 23sqm	STUDIO 25sqm
<b>NO. OF ROOMS</b>	71	8	8	11
<b>TOTAL</b>	<b>98</b>			

Table 3: BLOCK A Accommodation

	<b>ACCOMMODATION TYPE (BLOCK B)</b>			
	EN SUITE 13.5sqm	STUDIO 18sqm	STUDIO 23sqm	STUDIO 25sqm
<b>NO. OF ROOMS</b>	93	26	5	5
<b>TOTAL</b>	<b>129</b>			

Table 4: BLOCK B Accommodation

- 8.29 All cluster kitchen / living areas within Blocks A and B would be dual aspect, ensuring well-lit, ventilated spaces, which students will be able to utilise and enjoy. Each bedroom within a cluster will be provided with en-suite facilities and dedicated study areas for tenants to utilise providing high-quality internal accommodation (as is the case for studio bedrooms, ensuring high-quality accommodation is provided for all bedroom typologies).
- 8.30 The proposal would provide two bespoke communal amenity areas over a combined total of 381sqm of internal amenity space, split between Block A (at lower ground level) and Block B (ground floor level) equating to a ratio of 1.5sqm of internal amenity space per bedroom.
- 8.31 In addition, the proposals include external amenity space in the form of a landscaped rear communal area between the three blocks. This provides external space for future students to relax and socialise in an outdoor setting, with soft and hard landscaping areas for students to sit, relax and integrate.

	<b>ACCOMMODATION TYPE (BLOCK C)</b>			
	EN SUITE 13.5sqm	STUDIO 18sqm	STUDIO 23sqm	STUDIO 25sqm
<b>NO. OF ROOMS</b>	30	0	0	0
<b>TOTAL</b>	<b>30</b>			

Table 5: BLOCK C Accommodation

	<b>ACCOMMODATION TYPE (WILLIAM STREET PROPERTY)</b>			
	EN SUITE 13.5sqm	STUDIO 18sqm	STUDIO 23sqm	STUDIO 25sqm
<b>NO. OF ROOMS</b>	4	0	0	0
<b>TOTAL</b>	<b>4</b>			

Table 6: William Street Property

- 8.32 Block C would provide 30 en suite rooms of 13.5sqm each and the William Street property would provide four en suite rooms of the same size.

#### Accessibility and Inclusivity

- 8.33 Policy D5 of the London Plan (2021) states that developments should achieve the highest standards of accessible and inclusive design.
- 8.34 Policy D7 of the London Plan (2021) seeks to provide suitable housing and genuine choice for London's diverse population, including disabled people.
- 8.35 The Mayor of London's Purpose-built Student Accommodation LPG (October 2024) states wheelchair accessible room provision is expected at a level of 5%, with a further 5% adaptable, in line with the guidance in BS8300:2:2018 Design of an Accessible and inclusive built environment – Buildings – Code of Practice
- 8.36 Policy 16 of the Waltham Forest Local Plan LP1 (2024) seeks developments to provide M4(2) wheelchair adaptable and M4(3) wheelchair accessible accommodation.

<b>FLOOR LEVEL</b>	<b>STUDIO 25sqm</b>
G/F	2
1/F	3
2/F	2
3/F	2
4/F	2
5/F	1
<b>TOTAL</b>	<b>12</b>

Table 7: M4(3) Wheelchair Accessible Student Rooms



- 8.37 A total of 12 of the student bedrooms designed to M4(2) wheelchair adaptable standards and 12 student bedrooms are further designed to M4(3) wheelchair accessible standards, which would all be 25sqm studios as set out above. These are the largest rooms within the development. The studios measuring 23–25 sqm can be converted into adaptable units on a needs basis.
- 8.38 This wheelchair accessible provision would equate to 9.2%. As the proposal would be providing 24 wheelchair rooms overall and almost meets a 10% figure, it is considered acceptable and generally accords with Policies D5 and D7 of the London Plan (2021) and Policy 16 of the Waltham Forest Local Plan LP1 (2024).
- 8.39 It is also noted that wheelchair accessible bedrooms would be affordable subject to the interested parties meeting relevant criteria set by the HEP.

## D) DESIGN AND TOWNSCAPE

- 8.40 Policies D3 and D4 of the London Plan (2021) seek a design-led approach that optimises site capacity in a way that the local context of a site is enhanced by buildings that respond to local distinctiveness by appropriate layout, orientation, scale, and appearance, taking into consideration street hierarchy, building types and proportions. The design guidelines should be street-based with defined public and private environments with efficient servicing and maintenance strategies that protect the public realm. The design should also incorporate high quality materials that respond to the character and pattern of development of the site and its surroundings.
- 8.41 Policy 53 of the Waltham Forest Local Plan LP1 (2024) states that development proposals should reinforce or enhance local character, taking into account existing patterns of development, townscape, skyline, urban forms, building typologies, architecture, materials, and other features of local and historical significance. It adds that developments should respond appropriately to their context in terms of scale, height and massing.

### Scale and Layout

- 8.42 The proposed development involves the creation of 261 rooms as PBSA, along with 99sqm of commercial floorspace (use class E) on a building scale and massing and footprint informed by the residential-led scheme granted planning permission under Ref: 213777.
- 8.43 For comparison, the maximum building heights, measured from ground level to parapet level, are as follows:

	<b>CONSENTED SCHEME REF: 213777</b>	<b>PROPOSED SCHEME</b>
<b>BLOCK A</b>	17.3m	16.5m
<b>BLOCK B</b>	19.1m	19.8m
<b>BLOCK C</b>	16.6m	16.7m
<b>WILLIAM STREET PROPERTY</b>	8.4m	8.4m

*Table 8: Building Heights*

- 8.44 The proposed building heights (in storeys) of Blocks A-C, and that of the William Street dwelling, have been kept identical to the previous permission at the site. Blocks A and

C reach are five storeys in height, with Block B at six storeys. The proposed William Street property (also proposed as student accommodation (use class sui generis)) will reach c.2.5 storeys in height and would also be identical (in regard to building storeys) as the previous consent at the site.

- 8.45 The layout of the proposals would broadly be consistent with that consented with an east / west orientated block to the rear of William Street rear gardens (Block A), a north / south orientated block fronting St Heliers Road (Block B) and a block sitting behind the to-be-retained former cinema façade (Block C). The proposal also comprises a property within the William Street terrace, and whilst to be used for PBSA accommodation, still comprises the same footprint and form as the C3 dwelling previously consented in its location. The principle of the layout and format of the site generally was agreed under Planning Permission Ref: 213777, and thus that same layout has been sought broadly within these proposals, to ensure a synergy and continuation of the approved layout and orientation of the built form proposed.
- 8.46 There would be some variations from the previous scheme however, including notably, the addition of built form in the southeastern corner of Block B exceeding the footprint of that previously consented closer toward Leyton Green Towers. Having regard to separation distances and orientation of the building, the proposal is considered acceptable.

#### Appearance

- 8.47 Building on the principles of the consented scheme, this proposal provides an opportunity to further enhance the quality and integrity of the character of the built form.
- 8.48 The elevational treatments to Blocks A and B seeks an integration of modern design elements alongside more traditional architectural influences prominent in the surrounding area, particularly taking cues from both Edwardian and Georgian architecture. The choice of both red and buff bricks reflects the typical colour palettes often used in Edwardian and Georgian buildings, ensuring the new construction would complement the existing urban fabric and heritage.
- 8.49 Block C, which fronts High Road Leyton and like the consented scheme, seeks to incorporate modern architectural elements with distinctive art deco characteristics. This would create a building that would respect the site's historical context through the retention of the façade. The alterations to the art deco façade are required to ensure sufficient internal daylight and sunlight levels can be achieved for the PBSA bedrooms at first floor and above, but a sympathetic approach has been taken to ensure this does not appear incongruous or disjointed with the structure and form of the façade.

#### Landscaping

- 8.50 Policy G5 of the London Plan (2021) states that major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage.
- 8.51 Policy 53 of the Waltham Forest Local Plan LP1 (2024) also states that proposals will be supported where they incorporate high quality landscaping, tree planting and urban greening measures to maximise biodiversity and ecological value.
- 8.52 The soft and hard landscaping features proposed lie within the extensive external amenity space located between Blocks A, B and C. The focal point will be a new central communal area. Seating areas are proposed throughout this central area, and also in

the south of the site to the south of Block B, providing areas for students to sit, relax and socialise in amongst areas of high-quality soft landscaping. A high-quality, varied mix of soft landscaping treatments are proposed throughout the landscaped areas across the site at ground level.

- 8.53 Above ground level, there is a focus on maximising biodiversity and ecology, including the delivery of 1,067sqm of intensive green roofs atop the external bike store, to the north of Block A, and atop Blocks A, B and C, assisting with ecological enhancements at the site whilst also supporting sustainable urban drainage principles.
- 8.54 As a result of the proposed landscaping, the proposed development would achieve an Urban Greening Factor score of 0.41, which exceeds the requirement set in the London Plan (2021). Additionally, the imposition of a landscaping condition to any planning permission would ensure the development will secure the details as set in this application.
- 8.55 In summary, the proposed design of the buildings is considered acceptable, by reason that it would respond to the forms of development that are considered appropriate in the surrounding area. The proposal is therefore consistent with the objectives of Policies D3 and D4 of the London Plan (2021) and Policy 53 of the Waltham Forest Local Plan LP1 (2024) in achieving high quality design.

#### Internal Daylight

- 8.56 Policy D6 of the London Plan (2021) states that the design of development proposals should respect daylight and sunlight to surrounding residential dwellings with an appropriate approach to the context of the site, while minimising overshadowing and maximising the usability of outside amenity space.
- 8.57 In addition to this, Policy 57 of the Waltham Forest Local Plan LP1 (2024) highlights that development should respect the amenity of neighbours by avoiding loss of daylight and sunlight.
- 8.58 Although there is no specific requirement for student accommodation, the BRE guidelines suggest that the target for a main living space may be appropriate in shared use rooms. The bedrooms and studio rooms have therefore been assessed against the 150 median lux target for main living rooms.
- 8.59 Overall, the results of the daylight assessments show that of the 286 rooms assessed (25 living / kitchen rooms in clusters, 198 en-suite bedrooms and 63 studios), 263 (89%) will meet the daylight illuminance targets for their respective room's use. This is considered to be an excellent level of compliance for a large student accommodation scheme in an urban location and is indicative of the high-quality design.
- 8.60 Where daylight levels fall below the BRE recommendations across the bedrooms / studios, these are localised to the southern elevation of Block A that overlooks the Block B flank elevation / parking bay area, as they were with the consented site layout. Notwithstanding this, the student accommodation also benefits from larger communal spaces (including 381sqm of internal amenity space and high-quality landscaped external amenity areas), such that flexibility would be appropriate particularly given the urban location.
- 8.61 All other student rooms to the remaining proposed elevations satisfy the BRE recommendations and therefore this is considered to reflect the high-quality design of the proposal. All cluster living / kitchen rooms in Block A and B will be dual aspect in nature, ensuring good levels of lighting and ventilation, as well as outlook, for residents and are well-sized in order to allow sufficient use of the space by residents.

- 8.62 Overall, the proposal demonstrates an excellent level of compliance (in relation to daylight levels) for a large student accommodation scheme in an urban location setting and is considered acceptable in line with the function of the consented site layout and the design considerations set out in the BRE guidelines.

#### Internal Sunlight

- 8.63 Regarding direct sunlight, the relevant target is for proposed rooms to achieve at least 1.5 hours of direct sunlight on 21<sup>st</sup> March annually regardless of orientation. Guidance suggests that north-facing rooms should be minimised and as such, the scheme has been designed to optimise exposure to sunlight for the proposed rooms providing southerly aspect where possible. However, BRE guidelines do acknowledge that, particularly for large developments, it may not be possible to have every room enjoying a southerly aspect. This is particularly the case in respect of the current proposals which has been informed by the consented site layout and constrained backland nature of the brownfield site. As such, the guidelines should be interpreted flexibly and viewed on balance with other site constraints.
- 8.64 The internal sunlight exposure analysis demonstrates that of the 286 rooms tested, 148 (c.52%) meet or exceed the BRE target level of 1.5 hours of sunlight on 21<sup>st</sup> March. This result reflects a reasonably good level of sunlight exposure and is considered appropriate for denser accommodation developments, particularly where site layout constraints have an impact on unit orientation (such is the case in this instance).
- 8.65 Overall, the internal sunlight exposure compliance levels are considered to be appropriate for a modern accommodation scheme within an urban context with the scheme responding appropriately to the existing site layout as well as the consented footprint. The overall amenity provision is therefore considered to be fully acceptable and in line with the BRE guidance.
- 8.66 Rapleys were appointed to undertake an independent assessment of the submitted Daylight & Sunlight Report by EB7. Regarding internal daylight and internal sunlight, it concluded that the results demonstrate that 254/286 (89%) meet the recommendations in the BRE.
- 8.67 Due to the above considerations, the proposed development would be acceptable in terms of internal daylight and internal sunlight. As such, the development would accord with Policy D6 of the London Plan (2021) and Policy 57 of the Waltham Forest Local Plan LP1 (2024) and would be also on balance consistent with the advice given by the Mayor's Housing SPG (2016).

#### 8.68 Neighbouring Daylight and Sunlight Review

- 8.69 The independent assessment further assessed neighbouring properties that would result in some change from the proposed development and these are listed below.
- 8.70 The following properties were considered to have a **negligible** effect as a result of the proposed development:
- 2, 6, 8, 10, 12, 16, 20, 22, 24, 26, 28, 30 William Street.
  - 1-5 (all) St Heliers Road.
  - 794, 810, 812, 814 High Road Leyton.
- 8.71 The following properties were considered to have a **minor adverse** effect as a result of the proposed development:
- 4, 14 William Street.

- 6-10 (all) St Heliers Road.
- Leyton Green Towers.
- 790-792 High Road Leyton.

*4 William Street*

- 8.72 The residents may notice changes to their light levels, though it is unlikely to be determinantal to the current use and enjoyment of the light. Sunlighting is BRE compliant.

*14 William Street*

- 8.73 Overall, the development is more sympathetic to this property, with a isolate instance of reduced daylight. Sunlighting is BRE compliant.

*6 St Helier's Road*

- 8.74 The consented versus proposed results show that the proposed would cause slightly worse results than the consented, but these are within 7%. Overall, the occupier may notice a change, but it will not be detrimental to their use. Especially when the retained values are in line with widely accepted London targets. Sunlighting is BRE compliant.

*7 St Helier's Road*

- 8.75 There are 3 windows that deviate BRE recommendations (Ground W2, W3 and First W2). Whilst the deviation when reviewed in isolation show non-compliance, they serve rooms with multiple windows. In addition, the retained values are reasonable. Daylight distribution demonstrates full compliance, which demonstrates that light through either the size or number of windows serving the rooms is being let in. The consented versus proposed results show nearly identical levels to the consent, which sets the previously accepted changes in light. Sunlighting is subject to minor deviation.

*8 St Helier's Road*

- 8.76 It is likely the occupier may notice a change in their light levels, but it will not be large enough to be considered detrimental. The consented versus proposed results show nearly identical levels to the consent, which sets the previously accepted changes in light. Sunlighting is subject to a moderate change. However given there are multiple rooms receiving sunlight, the occupier will still have good access.

*9 St Helier's Road*

- 8.77 There are 4 windows that deviate BRE recommendations. These windows serve rooms with multiple windows which allow for mitigating light. It is likely the occupier may notice a change in their light levels, but it will not be large enough to be considered detrimental. The consented versus proposed results show nearly identical levels to the consent, which sets the previously accepted changes in light. Sunlighting is subject to a moderate change. However given there are multiple rooms receiving sunlight, the occupier will still have good access.

*10 St Helier's Road*

- 8.78 There are 4 windows that deviate BRE recommendations. These windows serve rooms with multiple windows which allow for mitigating light. It is likely the occupier may notice a change in their light levels, but it will not be large enough to be considered detrimental. The consented versus proposed results show nearly identical levels to the consent, which sets the previously accepted changes in light. Sunlighting is subject to a moderate change. However given there are multiple rooms receiving sunlight, the occupier will still have good access.

*Leyton Green Towers*

- 8.79 7 out of 102 windows deviate BRE recommendations. Overall, compliance to this property is good, there are improvements to VSC, compared to the previous scheme, in many cases and some isolated areas of deviation. Daylight distribution results are fully BRE compliant, which suggest the size of the windows allows for mitigating light. VSC and Daylight distribution results should be read in conjunction as the VSC is a spot measurement taken from the centre point of a window, which does not allow for mitigating light through the size or number of windows serving a room. This has been evidenced by the results. In addition to this mostly the retained VSC values are reasonable. The consented versus proposed results do demonstrate some changes, but where these occur it is to rooms served by multiple windows and therefore the room VSC are reasonable. Sunlighting is BRE compliant.

*790-792 High Road*

- 8.80 Whilst this property would have a slight decrease in daylight when reviewing against the consented, it is unlikely to be detrimental to the current use of the property. Sunlighting was not applicable.

- 8.81 The following properties were considered to have a **moderate adverse** effect as a result of the proposed development:

- 796, 808 High Road Leyton
- Market Parade

*796 High Road Leyton*

- 8.82 The consented versus proposed results demonstrate a noticeable change. It is likely this property will have an increased reliance on artificial lighting; the retained VSC is considered acceptable given the urban context. Sunlighting was not applicable.

*808 High Road Leyton*

- 8.83 It is likely this property will have an increased reliance on artificial lighting. The consented versus proposed results demonstrate a marginal change. Sunlighting shows some deviations. This property may notice some changes, but they are not too dissimilar to the consented, which was previously considered acceptable.

*Market Parade*

- 8.84 This property will experience noticeable changes to daylight and sunlight preservation. One of the reasons this property will experience change is due to the self-injurious building features (windows set in under the deck access above) combined with the underdeveloped nature of the site. A mirror massing study may have demonstrated that this property is built too close to the boundary and is a bad neighbour. It is likely that the occupiers will notice a change to their light levels to these windows, however, they are predominantly secondary/non-habitable windows to entrance hallways, bathrooms and bedrooms..

*Neighbouring Daylight and Sunlight Summary*

- 8.85 When reviewing the neighbouring daylight and sunlight levels, both the existing versus proposed schemes were considered and compared this to the results in the consented versus proposed. The development, based on the definition provided in the BRE would indicate a minor adverse effect. However, this is generated through a qualitative (percentage-based change) rather than reviewing the retained values. It is common in urban areas for alternative targeting to be adopted. This is because the BRE is typically set out for suburban areas. The retained VSC levels are consistent with the expectations for the site and surrounding locality for developments of this size and

massing. Sunlighting levels are generally acceptable, whilst there are areas of deviation when reviewing the results in isolation, when reviewing the results accumulatively on a property-by-property basis, the levels are reasonable and mostly in line with BRE recommendations. To conclude the proposed development leaves in most of the cases reasonable daylight and sunlight levels.

- 8.86 Due to the above considerations, the proposed development would be acceptable in terms of neighbouring daylight and sunlight. Overall, the development would have a minor effect on the neighbouring daylight and sunlight amenity in accordance with the BRE whilst the quality of the daylight and sunlight within the development is generally acceptable. Whilst there are minor deviations, these are due to other site relate factors and a balance between all considerations need to be taken account. As such, the development would accord with Policy D6 of the London Plan (2021) and Policy 57 of the Waltham Forest Local Plan LP1 (2024) and would be also on balance consistent with the advice given by the Mayor's Housing SPG (2016).

8.87 Outlook and Privacy

- 8.88 This PBSA-led scheme has been designed in terms of the built form with similar height, bulk and massing to that of the residential-led consented scheme Ref: 213777 and it is considered it has taken the opportunity to provide enhancements.

*East Elevation (Blocks A and B)*

- 8.89 The distances between the St Heliers Road properties and the proposed Blocks A and B range from 19m-26.9m, with the buildings set back from the road at different levels. The proposal ensures that the separation distance from the St Heliers Road houses exceeds 25m, which is considered acceptable.

*North Elevation (Block A)*

- 8.90 Considered to be the most sensitive back-to-back façade of the proposed development, it is important to note that currently, the William Street properties are immediately fronted with a large, blank façade of the existing cinema building, with little to no architectural interest and offering poor outlook for residents generally given the building sits immediately adjacent to the rear gardens.
- 8.91 The William Street elevation of Block A, this proposal places the buildings 14.7m-20.6m from the rear of the William Street houses, varying by storey, compared to the consented scheme, which ranges from 12.5m to 20.1m.
- 8.92 Further, the windows would be angled with one frosted side to prevent direct views to the William Street gardens, while the transparent glass would be oriented diagonally away from the William Street houses. The design of the angled windows aims to maintain privacy for the William Street residents by preventing overlooking, while also creating an active facade and allowing maximum light into the proposed bedrooms. The outlook distances from Block A to the William Street houses range from 23.1m-26.7m (21.1m-24.6m in the consented scheme Ref: 213777), exceeding the conventional target of 18-21m separation distance between to principle elevations.

*South Elevation (Block B)*

- 8.93 The separation distance from the rear of the High Road buildings to the south elevation of Block B would be up to 23.9m and is considered acceptable.

- 8.94 This proposal does however, step closer to the adjacent Leyton Green Towers than the consented scheme Ref: 213777, from first to fifth floor levels within Block B. To maintain privacy and outlook for residents of Leyton Green Towers the cluster bedrooms located at first to fourth floors do not have windows which face directly onto Leyton Green Towers (instead orientated looking south) to avoid directly overlooking from these rooms. Similarly, the east / north-east-facing living / kitchen rooms for these clusters at first to fourth floor would be orientated parallel to the orientation of Leyton Green Towers itself, which again would reduce direct overlooking from the living / kitchen areas into Leyton Green Towers.

*South-West Elevation (Block A)*

- 8.95 The parallel distances from the rear of the High Road Leyton buildings to the south-west corner of Block A would be 17.2m, which is considered acceptable.
- 8.96 Overall, this scheme has generally improved on separation distances from the consented scheme Ref: 213777 that would not cause unacceptable harm to the amenity of neighbouring properties and their occupiers and is therefore considered acceptable with regards to outlook and privacy.

**E) TRANSPORT, HIGHWAYS AND SERVICING**

- 8.97 Policy T1 of the London Plan (2021) states that proposals should support the delivery of the Mayor's strategic target of 80% of all trips in London to be made by foot, cycle, and public transport by 2041. Policy T1 requires developments to make the most effective use of land, in a way that reflects its connectivity and accessibility by existing and future transport links, walking and cycling routes to ensure that any impact on the London's transport networks and supporting infrastructure is mitigated.
- 8.98 Policy T5 of the London Plan (2021) sets out the minimum cycle parking standards for new developments and that development proposals should help remove barriers to cycling and create a healthy environment in which people choose to cycle, securing the provision of appropriate levels of cycle parking which should be fit for purpose, secure and well-located. Table 10.2 of the London Plan (2021) provides such minimum cycle parking standards for developments.
- 8.99 Policy T6 of the London Plan (2021) encourages car-free forms of development as a starting point for all development proposals in places that are well connected to public transport. Car-free developments should still provide disabled parking.
- 8.100 Policy T6.5 of the London Plan (2021) states that disabled persons parking for non-residential uses should be provided, ensuring that all non-residential elements should provide access to at least one on or off-street disabled persons parking bay.
- 8.101 Policy 60 of the Waltham Forest Local Plan LP1 (2024) sets out that new development will be expected to contribute to the Council's objective to deliver more attractive, accessible, healthy and safe streets, places and neighbourhoods for all residents in Waltham Forest.
- 8.102 The site has a Public Transport Accessibility Level (PTAL) score ranging from 5 to 6a, which is the highest PTAL. The site is located within the Bakers Arms District Centre with bus stops along High Road Leyton. The site is also a circa 8-minute walk to / from Leyton Midland Road Station (serving London Overground stations) and a 16-minute walk to / from Walthamstow Central Station (serving Victoria Line and London Overground stations).



#### Car Parking

- 8.103 The proposal would be car-free with the exception of the provision of one disabled parking space, accessed via St Heliers Road.
- 8.104 With the exception of disabled parking provision, car-free developments are supported and allowing proposals to optimise the use of the site in a sustainable location with good transport facilities nearby.
- 8.105 Policy 61 of the Waltham Forest Local Plan LP1 (2024) sets out that all new development will be expected to support a shift to active transport modes and encourage an increase in walking and cycling.

#### Cycle Parking

- 8.106 The proposals would provide long-stay and short-stay cycle parking for both the student accommodation and commercial element of the proposals:
- 262 long-stay PBSA spaces;
  - 28 short-stay PBSA spaces;
  - 4 long-stay commercial spaces; and
  - 4 short-stay commercial spaces.
- 8.107 The above provision would accord with the minimum requirements set in the London Plan (2021) and is therefore considered acceptable.
- 8.108 Notwithstanding the submitted application documents, a planning condition is recommended as part of any planning permission requesting a detailed cycle parking strategy, to ensure finalised details are agreed with officers.

#### Refuse

- 8.109 Policy SI 7 of the London Plan (2021) promotes a more circular economy that improves resource efficiency that encourages waste minimisation and waste prevention through the re-use of materials.
- 8.110 Policy SI 8 of the London Plan (2021) states how developments should plan for identified waste needs and measures for reducing waste, in line with the Circular Economy.
- 8.111 Policy 87 of the Waltham Forest Local Plan LP1 (2024) seeks to minimise waste during the construction and operation phases of development in line with the Circular Economy Statement and Whole Lifecycle Carbon Assessment, as required by the London Plan, to cover the whole lifecycle of the development on referable schemes.
- 8.112 On-street refuse collection is proposed for the PBSA use adopting the current routing so therefore no diversions would be required for the refuse collection vehicle.
- 8.113 The bin store for the commercial unit would be served from High Road Leyton and be located within 15m of High Road Leyton. Refuse collection for the student accommodation house (use class sui generis) will take place along William Street. The bins will be collected from William Street. Private collection services would be sought for the collection of commercial waste from the commercial unit fronting High Road Leyton.

#### Deliveries and Servicing

- 8.114 As with the consented residential-led scheme, an on-site loading bay is proposed to accommodate deliveries for the PBSA element of the proposals and would be retained as part of this PBSA application. It is proposed that deliveries for the commercial unit on High Road Leyton would occur on-street, on High Road Leyton.
- 8.115 Overall, the Council's Highways team raise no objection in principle, subject to identified S106 obligations and S278 works at Section 1 of this report with a number of recommended planning conditions as part of any planning permission including a detailed CLP, Delivery & Servicing Plan and Waste Management Strategy. The development would therefore be consistent with Policies SI 7, SI 8, T1, T5 and T6 of the London Plan (2021) and Policies 60 and 87 of the Waltham Forest Local Plan LP1 (2024).

## **F) TREES, LANDSCAPING AND ECOLOGY**

### Ecology

- 8.116 Policy G5 of the London Plan (2021) notes that major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage.
- 8.117 Policy G6 of the London Plan (2021) states that development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. This should be informed by the best ecological information and addressed from the start of the development process.
- 8.118 Policy 53 of the Waltham Forest Local Plan LP1 (2024) seeks to deliver high quality design through incorporating high quality landscaping, tree planting and urban greening measures to maximise biodiversity and ecological value in accordance with Policy 77 'Green Infrastructure and the Natural Environment', Policy 78 'Parks, Open Spaces and Recreation', Policy 79 'Biodiversity and Geodiversity' and Policy 80 'Trees'.
- 8.119 An Ecological Impact Assessment was submitted as part of the planning application. The Assessment identified that the site is dominated by hardstanding which is of negligible ecological interest. The ruderal habitat on-site, small in size, is of minor ecological value. An assessment for several species, both flora and fauna, identified limited ecological value present on the site overall.
- 8.120 The Epping Forest SAC and Epping Forest SSSI are located 4.6km and 3.1km north respectively, from the site. Natural England concurred with the Assessment conclusions with no adverse impact on the sites from recreational pressure resulting from the proposal if all mitigation measures are appropriately secured. In addition, a S106 financial contribution of £67,600.00 towards Strategic Access Management and Monitoring Strategy (SAMMS) would form part of any legal agreement. The methodology behind this amount is provided below and without this SAMMS contribution, Natural England would object to the proposed the development.
- 8.121 Policy H1 of the London Plan (2021) for the purposes of calculating SAMMS states at Para 4.1.9 that net non-self-contained accommodation for students should count towards meeting housing targets on the basis of a 2.5:1 ratio, with two and a half bedrooms / units being counted as a single home. Therefore, 261 student rooms or bedspaces when divided by 2.5 equals 104 units. The SAMMS tariff at LB Waltham Forest is £650.00 per unit, thereby resulting in a SAMMS contribution for this PBSA-led development of £67,600.00.

- 8.122 With the soft landscaping measures proposed and secured as a condition to any planning permission, these would enhance the ecological value of the site. With limited exceptions all permissions granted after 12<sup>th</sup> February 2024 are required to deliver 10% biodiversity net gain and are deemed to have been granted subject to the biodiversity net gain condition Biodiversity Net Gain on-site could be achieved through the implementation of soft landscaping measures that would exceed the required 10% net gain in habitats and hedgerows, wildlife-friendly soft landscape planting scheme (including green roofs and tree planting) and provisions of wildlife features such as bird, bat and invertebrate boxes. The proposals and mitigation measures to deliver biodiversity enhancements on-site stated in the submitted Ecological Impact Assessment are considered acceptable and would accord with Policies G5 and G6 of the London Plan (2021) and Policies 53, 77, 78, 79 and 80 of the Waltham Forest Local Plan (2024). Landscaping and biodiversity conditions are recommended as part of any planning permission and on this basis, the proposal is considered acceptable.
- 8.123 The application documents also comprises a Habitat Regulation Assessment (HRA) Screening and Appropriate Assessment template, which outlines mitigation measures on recreational impact and S106 financial contributions towards SAMMS with financial contributions towards Suitable Alternative Natural Greenspace (SANG) Strategy as part of the Community Infrastructure Levy; all of which are considered acceptable.

#### Trees

- 8.124 Policy G1 of the London Plan (2021) outlines the critical nature of green infrastructure in London, stating that London's green spaces and features should be protected and enhanced. Green infrastructure should be planned, designed and managed in an integrated manner.
- 8.125 Policy G7 of the London Plan (2021) states that within London, existing trees of value should be protected and maintained where achievable, along with the planting of new trees.
- 8.126 Policy 80 of the Waltham Forest Local Plan LP1 (2024) seeks to retain and protect significant trees.
- 8.127 An Arboricultural Impact Assessment was submitted with the application and concluded the proposal would be of negligible magnitude.
- 8.128 The proposal would ensure no mature, ancient, veteran or notable trees, no category 'A' or 'B' trees, and no trees of high landscape or biodiversity value would be removed. one self-seeded, suppressed sycamore tree (to facilitate the delivery of the proposed built form) would be removed resulting in a negligible alteration to the overall arboricultural character of the site. Pruning is proposed to two trees to facilitate the proposed development and is considered overall the proposal would not have an adverse impact on the arboricultural character and appearance of the local landscape.
- 8.129 As with the consented scheme, financial contributions were secured for the following and in the event on any loss of identified trees as part of the consented scheme:
- A financial contribution of £3,866.66 for an increased regime maintenance to 3 years.
  - Payment of Capital Asset Value for Amenity Trees (CAVAT) value of £35,317.00 in the case of the loss or removal of single tree (Council trees Ref: 9812) as a result of the demolition, construction or operation phases of the development.

- Payment of CAVAT value of £28,976.00 in the case of the loss or removal of single tree (Council trees Ref: 9809) as a result of the demolition, construction or operation phases of the development.
- 8.130 In respect to these and any other off-site trees adjacent to the application site, and as with the consented scheme Ref: 213777, any accidental damage or loss of such off-site trees particularly on St Heliers Road during the construction process are to be mitigated via respective CAVAT financial contributions as part of any S106 Agreement. It is therefore recommended that the above financial obligations are attached to any legal agreement for this proposed development to ensure trees are maintained where possible or compensated by any CAVAT payment.
- 8.131 The proposal would not result in any trees of significant, historic or ecological / habitat value and therefore is considered acceptable in accordance with Policies G1 and G7 of the London Plan (2021) and Policy 80 of the Waltham Forest Local Plan (2024).

## **G) ENERGY EFFICIENCY AND SUSTAINABLE DESIGN AND CONSTRUCTION**

- 8.132 Policy D11 of the London Plan (2021) requires that the resilience of proposals are maximised and potential physical risks, including those related to extreme weather such as flooding, draught, and overheating, should be minimised.
- 8.133 Policy SI 2 of the London Plan (2012) states that major developments should be net zero-carbon, reducing carbon dioxide emissions from construction and operation, and minimising energy demand in line with the energy hierarchy as follows:
- Be Lean: use less energy and manage demand during construction and operation.
  - Be Clean: exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly. Development in Heat Network Priority Areas should follow the heating hierarchy in Policy SI 3 Energy infrastructure.
  - Be Green: generate, store and use renewable energy on-site.
- 8.134 Policy SI 2 also notes that in meeting the zero-carbon target, a minimum on-site reduction of at least 35 per cent beyond Building Regulations is expected. Residential development should aim to achieve 10 per cent, and non-residential development should aim to achieve 15 per cent through energy efficiency measures.
- 8.135 Policy SI 4 of the London Plan (2021) states that development proposals should minimise internal heat gain and the impacts of the urban heat island through design, layout, orientation and materials, whilst demonstrating through a supporting energy strategy how they will reduce the potential for overheating and reliance on air conditioning systems.
- 8.136 Policy 85 of the Waltham Forest Local Plan LP1 (2024) seeks to reduce carbon footprint. One of the criteria of the policy specifies that all development of more than one home or greater than 100sqm to be supported by an Energy Assessment (for major development schemes this must be undertaken in accordance with GLA's latest Energy Assessment Guidance) setting out energy information for the development to demonstrate compliance with the following:
- All new major development must meet or exceed the net zero-carbon emissions target in line with the London Plan energy hierarchy and in line with best practice guidance including the GLA's latest energy planning guidance.
  - All new build development of more than one home or greater than 100sqm must achieve a minimum of 35% reduction below Part L of the Building Regulations

on-site, targeting net zero carbon where possible, in line with the London Plan energy hierarchy and with best practice guidance, including the GLA's Energy Planning Guidance. Development should meet the following London Plan 'Be Lean' stage (energy efficiency) carbon reduction targets before other measures are incorporated to meet the overall 35% reduction target, achieving a minimum of:

- 10% reduction below Part L of the Building Regulations for residential development.
- 5% reduction below Part L of the Building Regulations for non-residential development.
- Carbon Offset Fund (COF) contributions will then be required for any shortfall in emission reductions.

- 8.137 As required by the London Plan, the development follows the energy hierarchy, incorporating passive design measures, energy efficient equipment and renewable energy.
- 8.138 The development would result in an efficient building fabric, including high-quality wall insulation, highly efficient glazing and efficient building systems / services in particular. The Be Lean stage of the London Plan hierarchy, would result in a 16.8% CO2 emissions reduction for the development as a whole exceeding the London Plan Be Lean target of 15% reductions.
- 8.139 For Be Green stage of the London Plan hierarchy, features such as PV Panels and a communal air source heat pump system for heating and hot water (for the student component of the proposals) are proposed. A separate VHR heat pump system is proposed for the commercial unit. Overall, as a result of these Be Green features, the proposals at present achieve a 35% improvement in carbon emission reductions over the Building Regulations Part L, thus achieving the London Plan target for on-site carbon savings.
- 8.140 To achieve zero carbon emissions, an offset payment is proposed in line with policy requirements. the carbon offset is estimated at £49,619.00 secured as an obligation to any S106 Agreement.
- 8.141 Accordingly, the proposal is considered acceptable and would accord with Policies SI 2 and SI 4 of the London Plan (2021).

## **H) FLOOD RISK AND DRAINAGE**

### Water Efficiency

- 8.142 Policy SI 5 of the London Plan (2021) states that development proposals should minimise the use of mains water in line with the operational requirements of the Building Regulations to achieve mains water consumption of 105 litres or less per head per day. These requirements can be met through the capture and re-use of surface, greywater, and rainwater.
- 8.143 Policy 89 of the Waltham Forest Local Plan LP1 (2024) seeks to prevent any adverse impacts on water quality and water supply through a number of measures including residential development must not exceed a maximum water use of 105 litres per head per day (excluding the allowance of up to 5 litres for external water consumption).
- 8.144 The developer is encouraged to reduce water use within the development to achieve the 105 litres per person per day as advised by the Council's Sustainability Consultant, to ensure that the requirements of Policy SI 5 of the London Plan (2021) and Policy 89 of the Waltham Forest Local Plan LP1 (2024) are met.

Flood Risk and Drainage

- 8.145 Policy SI 12 of the London Plan (2021) states development proposals should ensure flood risk is minimised and mitigated through sufficient measures integrated within the development.
- 8.146 Policy 91 of the Waltham Forest Local Plan (2024) seeks to manage flood risk.
- 8.147 A Flood Risk Assessment and Drainage Strategy was submitted with the application, which concluded that the potential risk of flooding from sources at the site are considered low / very low risk following the implementation of mitigation measures proposed in the Assessment. The site is within Flood Zone 1 and the Environment Agency raise no objection to the proposal who consider there are no constraints on the site.
- 8.148 A surface water drainage strategy would reduce flood risk by restricting surface water flows in accordance with the London Plan. A sustainable drainage system is proposed that would incorporate a combination of green roofs and permeable paving.
- 8.149 Storm water attenuation is provided for all storms up to and including the 1 in 100-year critical event (including a 40% allowance for climate change) in line with relevant policy requirements. The proposed development would result in a betterment over the pre-development scenario in terms of a reduction of surface water runoff equating to up to 98%.
- 8.150 The Flood Risk Assessment concluded that the site would not be at significant risk of flooding nor would it increase the risk of flooding to neighbouring properties. Thames Water raises no concerns in relation to the proposed development. Subject to drainage conditions, the development would be consistent with the requirements of Policy SI 12 of the London Plan (2021) and Policy 91 of the Waltham Forest Local Plan LP1 (2024), in that it would not pose a risk of flooding, by virtue of its position within a Flood Zone 1 and the acceptable drainage mitigation measures.

**I) ENVIRONMENTAL IMPACT**

Contaminated Land

- 8.151 Policy SD1 of the London Plan (2021) only supports developments that take appropriate measures that deal with contamination that may exist within a site.
- 8.152 Policy 90 of the Waltham Forest Local Plan LP1 (2024) seeks to manage contaminated land and prevent the spread of contamination.
- 8.153 Environmental Health officers raise no objection to the proposal subject to conditions to address the risk associated with site contamination. The proposal would therefore accord with Policy SD1 of the London Plan (2021) and Policy 90 of the Waltham Forest Local Plan LP1 (2024).

Noise

- 8.154 Policy D14 of the London Plan (2021) notes that residential proposals should seek to reduce, manage and mitigate noise to improve health and quality of life. Such proposals should seek to mitigate and minimise the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development without placing unreasonable restrictions on existing noise-generating uses. Where development cannot be located a significant distance from existing noise sources, due to site-specific constraints, Policy D14 encourages the mitigation of any potential

adverse effects resulting from noise-generating sources through applying good acoustic design principles within the development.

- 8.155 Policy 50 of the Waltham Forest Local Plan LP1 (2024) seeks to minimise the impact of noise, vibration and light pollution.
- 8.156 The Council's Environmental Health team reviewed the submitted Noise Impact Assessment, which requires further information from the developer at the time of writing and cannot be accepted. However, subject to further information provided to address any detrimental impact on amenity and to ensure that an acceptable living environment is delivered for existing residents surrounding the site and future occupiers of the proposed development, it is recommended that this could be addressed as a condition to any planning permission to accord with Policy D14 of the London Plan (2021) and Policy 50 of the Waltham Forest Local Plan LP1 (2024).

#### Air Quality

- 8.157 Policy SI 1 of the London Plan (2021) sets out the requirements for new development to address poor air quality. All forms of development must be at least air quality neutral and all major applications should demonstrate appropriate mitigation measures through an Air Quality Assessment.
- 8.158 Policy 82 of the Waltham Forest Local Plan LP1 (2024) states that the Council will protect and enhance the natural environment of the Epping Forest and its Special Area of Conservation (SAC) and seek to ensure that development proposals contribute to the mitigation of adverse recreational and air quality effects on the SAC.
- 8.159 Policy 88 of the Waltham Forest Local Plan LP1 (2024) states that new development should ensure the avoidance of any adverse air pollution impacts and aim to improve air quality in the borough.
- 8.160 Within the Council's Air Quality Action Plan (AQAP), the entire Borough of Waltham Forest has been declared an Air Quality Management Area (AQMA), which highlights pollution levels that exceed the Government's Air Quality Objectives. The Council will continue to seek planning obligations on a site-by-site basis when it is identified during the planning process that the construction of a development or the operation of a certain use of a development will potentially harm or cause impact to the surrounding environment.
- 8.161 An Air Quality Assessment has been submitted with this application and found that in regard to the construction phase of the development, potential air quality impacts such as from fugitive dust emissions could (theoretically, without mitigation) occur as a result of demolition, earthworks, construction and track-out activities. It is considered however that the use of good practice control measures would provide suitable mitigation for a development of this size and nature and reduce potential impacts to an acceptable level.
- 8.162 The level of anticipated [low] traffic generation from the site concluded that impacts on existing pollutant levels as a result of operational phase pollutant emissions were predicted to be not significant in accordance with relevant screening criteria. The London Plan states that new developments must be considered air quality neutral, which the proposed development is considered to achieve.
- 8.163 As with the consented scheme, where a financial contribution of £8,300.00 towards air quality mitigation and monitoring was secured, it is recommended that the identical amount is attached as an obligation to any legal agreement for this proposed development.

- 8.164 The Council's Environmental Health section raise no objection to the proposal regarding air quality and recommended air quality related conditions to any planning permission including requiring compliance with the non-road mobile machinery (NRMM) Low Emission Zone.
- 8.165 Due to the above, the development would be acceptable with regards to air quality and pollution and in accordance with policy SI 1 of the London Plan (2021) and Policy 88 of the Waltham Forest Local Plan LP1 (2024), subject to conditions.
- 8.166 Archaeology
- 8.167 Policy HC1 of the London Plan (2021) states that development proposals affecting heritage assets and their setting should be sympathetic to the assets' significance and appreciation within their surroundings. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations in the design process.
- 8.168 Policy 73 of the Waltham Forest Local Plan LP1 (2024) seeks to protect archaeological assets and Archaeological Priority Areas.
- 8.169 The site is located within the Leyton Tier 2 Archaeological Priority Area and an Archaeological Desk-Based Assessment has been submitted as part of the planning application. The Assessment identifies that no designated archaeological assets, such as scheduled monuments or registered battlefields, have been identified within the site, and likewise there are no archaeological monument entries within the site.
- 8.170 Historic England Archaeology – Greater London Archaeological Advisory Service (GLAAS) were consulted on this application who raise no objection subject to conditions requiring written schemes of investigations prior to commencement of development. As such, the development would accord with the provisions of Policy HC1 of the London Plan (2021) and Policy 73 of the Waltham Forest Local Plan LP1 (2024).

## **J) SAFETY AND SECURITY**

### Fire Safety

- 8.171 Policy D12 of the London Plan (2021) requires the submission of a Fire Safety Statement for all major forms of development proposals. This strategy should be produced by a third-party, independent, and suitably qualified assessor and should aim for design proposals that incorporate appropriate features to reduce the risk of a fire. The strategy should include appropriate fire alarm systems, measures for minimising the risk of fire spread, details of means of evacuation and passive/active fire safety measures.
- 8.172 The submitted Fire Statement demonstrates that the design of the development is based on the functional requirements of Approved Document B Volume 1 Dwellings using BS 9991:2015 - Fire Safety in the design, management and use of Residential buildings – Code of practice to achieve reasonable standards of fire safety for all people in and around buildings.
- 8.173 The Fire Statement addresses the requirements of Policy D12 of the London Plan (2012) and ensures the following points have been detailed:
- Identify suitably positioned unobstructed outside space for fire appliances;
  - Appropriate for use as an evacuation assembly point;



- Appropriate features which reduce the risk to life and the risk of serious injury in the event of a fire;
- Constructed in an appropriate way to minimise the risk of fire spread;
- Suitable and convenient means of escape has been developed along with an evacuation strategy for all building users; and
- Suitable access and equipment for firefighting.

8.174 The fire strategy also considers fire safety provisions for disabled persons with consideration given to the evacuation of disabled persons so as not to disadvantage any person with reduced mobility. The building has been designed to incorporate safe and dignified emergency evacuation for all building users. There would be two lifts provided and both designed to meet the requirements for fire evacuation lifts, suitable to be used to evacuate people who require level access from the building.

8.175 The Health & Safety Executive (HSE) were consulted on this application, although they review buildings in excess of 18 metres in height, which the proposal is not and therefore have not provided any comment. No condition requiring the re-submission of a fire strategy is required in this instance and only a compliance condition that ensures that the development is carried out in accordance with the submitted Fire Statement is recommended that would accord with Policy D12 of the London Plan (2021).

#### Crime Prevention

8.176 Policy D11 of the London Plan (2021) sets out policy requirements that ensure all new forms of development to incorporate acceptable levels of safety and security measures and ensure that buildings remain resilient to emergencies.

8.177 Policy 58 of the Waltham Forest Local Plan LP1 (2024) seeks to make places safer and design out crime.

8.178 The Metropolitan Police were consulted on the application, raising no objection to the proposal and recommends a condition seeking Secured by Design certification. The development would therefore meet the requirements of Policy D11 of the London Plan (2021) and Policy 58 of the Waltham Forest Local Plan LP1 (2024) with regards to security and designing out crime.

#### **K) PLANNING OBLIGATIONS**

8.179 S106 Agreements are a material consideration in the determination of a planning application. The purpose of such an Agreement is to make otherwise unacceptable development acceptable and they should only be sought where they meet all of the following tests:

- i) Necessary to make the development acceptable in planning terms;
- ii) Directly related to the development; and
- iii) Fairly and reasonably related in scale and kind to the development.

8.180 The following S106 Heads of Terms are recommended (and in more detail at Section 1 of this report), having regard to planning policy:

- 35% affordable student accommodation.
- Nomination Agreement.

- Student accommodation Marketed to University of Portsmouth for three months.
- Wheelchair Accessible Marketing Strategy.
- Employment and Skills Plan.
- £105,000.00 for loss of existing employment floorspace.
- 30% local labour, 14 apprentice posts and 13 work placements with default payments if any remain unfulfilled.
- Highways enabling works.
- A S278 Agreement with Highways.
- £11,000.00 towards Construction Logistics Plan monitoring.
- £75,000.00 towards Healthy Streets for London objectives.
- Car-free development with the exception of disabled parking space.
- Development and occupiers ineligible for parking permits for any CPZ in the borough.
- £49,619.00 towards COF with second COF payment calculation after the Energy Strategy has been updated.
- Connection ready.
- Updated Energy Statements on commencement and completion.
- £8,300.00 towards implementation of the Air Quality Action Plan.
- £3,866.66 for three years tree maintenance.
- Payment of CAVAT value of £35,317.00 in the case of the loss or removal of single tree (Council trees Ref: 9812) as a result of the demolition, construction or operation phases of the development.
- Payment of CAVAT value of £28,976.00 in the case of the loss or removal of single tree (Council trees Ref: 9809) as a result of the demolition, construction or operation phases of the development.
- Other CAVAT contributions in the event of any accidental damage or loss of any other off-site trees on St Heliers Road during the construction process.
- £67,600.00 towards Strategic Access Management and Monitoring Strategy (SAMMS) for Epping Forest SAC.
- To register the site on the Biodiversity Gain Site Register.
- To complete the Habitat Creation and Enhancement Works at the application site in accordance with the Habitat Management and Monitoring Plan.
- To provide Management Plan Monitoring Reports to the Council for either on-site provision or biodiversity off setting scheme.
- Financial contribution towards BNG monitoring, over periods including year 1, 2, 5, 10, 20 and 30 for either on-site provision or biodiversity off setting scheme.

- Any shortfall or failure to deliver 10% uplift on site, will require either of the following options to be taken up via either Biodiversity Offsetting scheme or statutory biodiversity credits.
- Retention of Architect during build phase of the development.
- 5% of the total amount of contributions towards monitoring, implementation, and compliance with the S106 Agreement.
- Legal Fees.

## **9 CONCLUSION**

- 9.1 The proposed buildings would be acceptable in terms of scale, height, and massing, particularly as they have been referenced with the consented scheme under Ref: 213777. The design of the buildings would provide a modern approach whilst respecting the art deco façade fronting High Road Leyton and character of the surrounding context. The proposals are therefore considered to be of high quality.
- 9.2 The proposed development would be acceptable in terms of neighbouring daylight and sunlight. Overall, the development would have a minor effect on the neighbouring daylight and sunlight amenity in accordance with the BRE whilst the quality of the daylight and sunlight within the development is generally acceptable. Any impact is considered to be outweighed by the benefits of the proposed development, particularly in terms of providing much-needed student accommodation within the locality.
- 9.3 The proposed student accommodation with 35% affordable as required by policy would provide an acceptable living environment and would be consistent with the criteria outlined by Policy H15 of the London Plan (2021) in terms of spatial requirements and provision of internal and external amenity spaces.
- 9.4 The proposed development would have an acceptable impact on highway safety and would involve highways works that would aim to enhance the public realm and pedestrian safety. The development would provide acceptable waste and cycle stores and the provision of one disabled parking space is accepted given its sustainable location.
- 9.5 The development would incorporate the highest environmental standards and would be sustainable, in that it would deliver acceptable energy reduction measures and meet the required carbon dioxide reduction targets. There would be a clause in any S106 Agreement for the development to provide an option to connect to a DHN. Furthermore, the development would achieve a 'very good' BREEAM rating and the development would also consider proper measures to minimise impact on air quality, flood risk and contamination.
- 9.6 Any removal of trees as a consequence of the development would result in a financial contribution to compensate for such loss. Further, the proposal would provide an opportunity for enhanced soft landscaping and public realm for future occupiers of the proposed development and would enhance the green infrastructure and natural vegetation of the site with tree planting and green measures that would contribute to the biodiversity of the site. Notwithstanding the uplifted ecological value, landscaping conditions are recommended. The development would also achieve a greenfield run-off rate as a result of SuDS; a significant improvement on the current situation.
- 9.7 The development would achieve appropriate safety and security measures and a condition requiring Secured by Design certification, as advised by the Metropolitan Police.

- 9.8 The conditions and planning obligations set out in the S106 Heads of Terms would ensure that any adverse impact of the scheme would be mitigated against the positive aspects of the proposed development. All material planning considerations have been considered, including responses to consultation. On balance, it is not considered that there are any material planning considerations in this scheme that would warrant a refusal of the planning application.
- 9.9 Due to the above considerations and considering the planning merits of the scheme and the consistency of the development when assessed against the Development Plan, the proposed development is acceptable when reviewed against the relevant planning policies mentioned above.

## **10 ADDITIONAL CONSIDERATIONS**

### Public Sector Equality Duty

- 10.1 In making your decision you must have regard to the public sector equality duty (PSED) under S149 of the Equalities Act. This means that the Council must have due regard to the need (in discharging its functions) to:
- A. Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.
  - B. Advance equality of opportunity between people who share a protected characteristic and those who do not. This may include removing or minimising disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic; taking steps to meet the special needs of those with a protected characteristic; encouraging participation in public life (or other areas where they are underrepresented) of people with a protected characteristic(s).
  - C. Foster good relations between people who share a protected characteristic and those who do not including tackling prejudice and promoting understanding.
    - The protected characteristics are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.
    - The PSED must be considered as a relevant factor in making this decision but does not impose a duty to achieve the outcomes in s.149 is only one factor that needs to be considered and may be balance against other relevant factors.
    - It is not considered that the recommendation to grant permission in this case will have a disproportionately adverse impact on a protected characteristic.

### Human Rights:

- 10.2 In making your decision, you should be aware of and take into account any implications that may arise from the Human Rights Act 1998. Under the Act, it is unlawful for a public authority such as the London Borough of Waltham Forest to act in a manner that is incompatible with the European Convention on Human Rights.
- 10.3 You are referred specifically to Article 8 (right to respect for private and family life), Article 1 of the First Protocol (protection of property). It is not considered that the recommendation to grant permission in this case interferes with local residents' right to respect for their private and family life, home and correspondence, except insofar as it is necessary to protect the rights and freedoms of others (in this case, the rights of the applicant). The Council is also permitted to control the use of property in accordance with the general interest and the recommendation to grant permission is

considered to be a proportionate response to the submitted application based on the considerations set out in this report.

## **11 RECOMMENDATION**

- 11.1 The Planning Committee is recommended to **GRANT** planning permission subject to conditions and informatives and completion of a S106 Agreement with the Heads of Terms as set out in Paragraph 1.1 of this report.

### **CONDITIONS**

#### **Time Limit:**

1. The development shall be begun before the expiration of three years from the date of this permission.

REASON: To comply with the Section 91 of the Town and Country Planning Act 1990 (as amended).

#### **Approved Drawings and Documents:**

2. The development hereby approved shall be carried out in accordance with the following drawings and documents:

##### Drawings:

24080-0220 Rev P02 Site Location Plan  
24080-0201 Rev P02 Existing Basement Plan  
24080-0202 Rev P02 Existing Ground Floor Plan  
24080-0203 Rev P02 Existing First Floor Plan  
24080-0204 Rev P02 Existing Second Floor Plan  
24080-0205 Rev P02 Existing Third Floor Plan  
24080-0206 Rev P02 Existing Fourth Floor Plan  
24080-0207 Rev P02 Existing Roof Plan  
24080-0208 Rev P00 Existing Site Plan  
24080-0209 Rev P00 Existing Front & Rear Elevations  
24080-0210 Rev P00 Existing West Street Elevation & East Side Elevation 2  
24080-0211 Rev P00 Existing South Side Elevations 1 & 2  
24080-0212 Rev P00 Existing North Side Elevations 1 & 2  
24080-0213 Rev P00 Existing Part West Elevation  
24080-0214 Rev P01 Existing East St El. Western Side High Road Existing Section AA  
24080-0215 Rev P01 Existing Section BB & CC  
24080-0309 Rev P08 Proposed – Plan Site Plan  
24080-0310 Rev P02 Proposed – Plan Basement  
24080-0311 Rev P10 Proposed – Plan Ground Floor  
24080-0312 Rev P02 Proposed – Plan First Floor  
24080-0313 Rev P02 Proposed – Plan Second Floor  
24080-0314 Rev P02 Proposed – Plan Third Floor  
24080-0315 Rev P02 Proposed – Plan Fourth Floor  
24080-0316 Rev P02 Proposed – Plan Fifth Floor  
24080-0317 Rev P05 Proposed – Plan Roof  
24080-0320 Rev P05 Proposed Elevation Block A&B – East Elevation  
24080-0321 Rev P05 Proposed Elevation Block A&B – West Elevation  
24080-0330 Rev P05 Proposed Elevation Block A - North

24080-0331 Rev P03 Proposed Elevation Block A – South Elevation  
24080-0332 Rev P05 Proposed Elevation Block B – South Elevation  
24080-0333 Rev P03 Proposed – Elevation Block B – North Elevation  
24080-0334 Rev P03 Proposed Elevation Block A&B – Section AA  
24080-0335 Rev P03 Proposed – Section Block B – Section BB  
24080-0340 Rev P03 Proposed – Elevation Block C – High Road  
24080-0341 Rev P04 Proposed – Elevation Block C – North East Elevation  
24080-0342 Rev P00 Proposed – Section Block C –Section AA  
24080-0343 Rev P00 Proposed – Elevation Block C – Side Elevations  
24080-0350 Rev P02 Proposed – Elevations Infill Property  
24080-0351 Rev P00 Proposed – Section Infill Property  
24080-0360 Rev P01 Proposed – Elevation External Cycle Store  
24080-0361 Rev P00 Proposed – Elevation Heat Rejection Plant  
24080-0370 Rev P01 Proposed Bay Study Block A  
24080-0371 Rev P02 Proposed Bay Study Block C

Documents:

Air Quality Technical Note by Enzygo (June 2024)  
Arboricultural Implications Report by SJA Trees (July 2024)  
Archaeological Desk Based Assessment by HCUK Group (June 2024)  
Basement Impact Assessment Report by SD Engineers (4<sup>th</sup> October 2024)  
Biodiversity Impact Calculator Report by ACD Environmental (13<sup>th</sup> March 2025)  
Circular Economy Statement by JAW Sustainability (17<sup>th</sup> September 2024)  
Construction and Demolition Method Statement by Ardent (July 2024)  
Daylight & Sunlight Report by EB7 (14<sup>th</sup> March 2025)  
Delivery and Servicing Management Plan by Ardent (July 2024)  
Design & Access Statement by Corstorphine & Wright (July 2024)  
Desktop Health Impact Assessment by Hodkinson Consultancy (July 2024)  
Ecological Impact Assessment by ACD Environmental (13<sup>th</sup> March 2025)  
Energy Strategy Report by JAW Sustainability (8<sup>th</sup> November 2024)  
External Lighting Statement Report by Integration Consultancy (1<sup>st</sup> October 2024)  
Fire Statement by London Bridge Associates (24<sup>th</sup> July 2024)  
Flood Risk Assessment & Drainage Strategy by Ardent (July 2024)  
Framework Travel Plan by Ardent (July 2024)  
Geo-Environmental Assessment by IDOM (September 2019)  
Healthy Streets Transport Assessment by Ardent (July 2024)  
Heritage Impact Assessment by HCUK Group (July 2024)  
Landscape General Arrangement Drawing No. 1039-ENP-XX-00-DR-L-90301 Rev P17 by Enplan (Apr 2024)  
Noise Impact Assessment by Syntegra Consulting (July 2024)  
Outline Construction Logistics Plan by Ardent (March 2025)  
Overheating Assessment by JAW Sustainability (15<sup>th</sup> July 2024)  
Parking Management Plan by Ardent (March 2025)  
PBSA Needs Assessment by Savills (23<sup>rd</sup> July 2024)  
Planning Statement by Savills (October 2024)  
Plant Noise Assessment by Syntegra Consulting (July 2024)  
Site Waste Management Plan by Ardent (September 2024)  
Statement of Community Involvement by Cavendish (May 2024)  
Student (PBSA) Management Plan by Homes for Students Rev C (February 2025)  
Sustainability Statement by JAW Sustainability (8<sup>th</sup> November 2024)  
Transport Technical Note by Ardent (March 2025)  
Urban Greening Factor based on Drawing No. 1039 -ENP-XX-))-DR-L-90301.P16 by Enplan (undated)  
Utilities & Servicing Statement by Ardent (July 2024)

Ventilation & Extraction Statement by Integration Consultancy (2<sup>nd</sup> October 2024)  
Ventilation Strategy (G/F) by Integration Consultancy Drawing No. 679-INT-300924-SK01 (30<sup>th</sup> September 2024)  
Ventilation Strategy (Roof) by Integration Consultancy Drawing No. 679-INT-300924-SK02 (30<sup>th</sup> September 2024)  
Whole Life Carbon Assessment by JAW Sustainability (23<sup>rd</sup> September 2024)

REASON: For the avoidance of doubt and in the interests of proper planning.

**Materials:**

3. Prior to commencement of the development (excluding ground works and substructure), and notwithstanding any indications shown on the submitted plans, samples, and a schedule of materials to be used in the external surfaces of the development hereby permitted shall be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details and thereafter retained as such for the lifetime of the development.

REASON: To ensure a satisfactory appearance in accordance with Policy D4 of the London Plan (2021) and Policy 53 of the Waltham Forest Local Plan LP1 (2024).

**Highways and Parking:**

4. A detailed finalised Construction Logistics Plan is required to be submitted for approval by the Local Planning Authority considering the construction phase of the development using the TfL template and guidance, which include inter alia:

- Journey planning, highlighting access routes.
- Method of access and parking of construction vehicles.
- Measures to prevent deposition of mud on the highway.
- Dust mitigation and suppression measures to control the spread of dust from demolition, disposal, and construction.
- Site operation times.
- Loading and unloading locations, taking into consideration existing parking restrictions.

The development shall be implemented in accordance with the approved details.

REASON: In the interests of highway and pedestrian safety in accordance with Policy 65 of the Waltham Forest Local Plan LP1 (2024).

5. Prior to commencement of development, a Highways Condition Survey of the carriageway and footways fronting the site shall be submitted to and approved in writing by the Local Planning Authority. The condition survey report would include a site location plan highlighting the location of the photographs. Any damage to the highways as a result of the construction works will be reinstated by the Council and funded by the developer.

REASON: In the interest of pedestrian and highway safety, to comply with Policy 63 of the Waltham Forest Local Plan LP1 (2024).

6. Prior to first occupation of any part of the development hereby approved, a Car Park Management Plan shall be submitted to and approved in writing by the Local Planning Authority. The car parking spaces shall be laid out and allocated in accordance with the approved Management Plan and shall be made available for the purposes of parking private motor vehicles in association with the development and for no other purpose. The development shall be implemented in accordance with the approved details and retained as such for the lifetime of the development.

REASON: In the interests of highway and pedestrian safety in accordance with Policy 66 of the Waltham Forest Local Plan LP1 (2024).

7. Prior to first occupation of the development and notwithstanding any indication on the submitted drawings, a schedule showing the number and location of all cycle parking spaces and details of secure and sheltered cycle storage facilities, shall be submitted to and agreed in writing by the Local Planning Authority. The agreed facilities shall be fully implemented prior to occupation and shall be permanently retained thereafter.

REASON: In the interest of security and sustainable development, in compliance with Policies 60 and 61 of the Waltham Forest Local Plan LP1 (2024).

8. Prior to first occupation of any part of the development hereby permitted, a detailed Delivery and Servicing Plan (DSP) shall be submitted to and approved in writing by the Local Planning Authority. The DSP shall make reference to safety measures that will be in place to reduce conflicts between service vehicles and other users (cycle stores, disabled parking and any other pedestrians) and shall also include details on how delivery vehicles are restricted during peak periods.

REASON: In the interest of highway safety, in compliance with Policy 64 of the Waltham Forest Local Plan LP1 (2024).

9. Prior to occupation, details of any form of external illumination and / or external lighting on the buildings and around the site including any street lighting shall be submitted to and approved in writing by the Local Planning Authority. The approved details shall be fully implemented prior to the first occupation of any part of the development hereby permitted and retained as such for the lifetime of the development.

REASON: In the interest of health and to protect the living conditions of existing and future residents in the locality in accordance with Policy 50 of the Waltham Forest Local Plan LP1 (2024).

**Basement Approval in Principle:**

10. No demolition or development shall commence, until full details of Basement Approval in Principle (AiP) has been submitted to and approved in writing by the Local Planning Authority. The approved Basement AiP shall be fully implemented, and the implemented measures shall thereafter be retained and maintained as such for the lifetime of the development.

REASON: In the interests of highway and pedestrian safety in accordance with Policy 66 of the Waltham Forest Local Plan LP1 (2024).

**Air Quality and Noise:**



11. No non-road mobile machinery (NRMM) shall be used on the site unless it is compliant with the NRMM Low Emission Zone requirements (or any superseding requirements) and until it has been registered for use on the site on the NRMM register (or any superseding register).

REASON: To ensure that air quality is not adversely affected by the development in line with Policy SI 1 of the London Plan (2024) and the Mayor's SPG: The Control of Dust and Emissions during Construction and Demolition.

12. No demolition or development shall commence until full details of the proposed mitigation measures for impact on air quality and dust emissions, in the form of an Air Quality and Dust Management Plan (AQDMP), have been submitted to and approved in writing by the Local Planning Authority. In preparing the AQMDP, the applicant should follow the recommendations outlined in the AQ assessment submitted with the application. If the development is located in or near an air quality focus area the applicant should follow the guidance on mitigation measures for **Medium Risk** and include automatic dust monitoring as a minimum.

REASON: To manage and mitigate the impact of the development on the air quality and dust emissions in the area and London as a whole, and to avoid irreversible and unacceptable damage to the environment in accordance with Policy SI 1 of the London Plan (2024).

13. The noise of all new plant shall be 10dB(A) below the underlying background noise level (LA90) during the time of plant operation at a position one metre external to the nearest noise sensitive premises. The underlying background LA90 shall be determined in the absence of the new plant noise. This assessment must be completed in accordance with BS4142: 2014 Method for rating industrial noise affecting mixed residential and industrial areas.

REASON: To protect the amenities of adjoining occupiers and the surrounding area, in order to comply with Policy 50 of the Waltham Forest Local Plan LP1 (2024).

#### **Hours of Operation:**

14. Prior to first use of any part of the commercial floorspace, details of hours of operation shall be submitted to and approved in writing by the Local Planning Authority. Such details as approved shall be for the first use until a change in any of the commercial floorspace within Use Class E would require the submission of further details for approval by the Local Planning Authority.

REASON: To protect the amenities of occupiers and the surrounding area, in order to comply with Policy 50 of the Waltham Forest Local Plan LP1 (2024).

15. No deliveries shall be taken to or dispatched from, the site, other than between the hours of 08:00 and 23:00 Mondays to Saturdays, and at no time on Sundays, Bank Holidays or Public Holidays.

REASON: To protect the amenities of occupiers and the surrounding area, in order to comply with Policy 50 of the Waltham Forest Local Plan LP1 (2024).

#### **Landscaping & Biodiversity:**

16. Prior to occupation of any part of the development hereby permitted, a scheme of hard and soft landscape works shall be submitted to and approved in writing by the Local Planning Authority. Soft landscape works shall include: planting plans, and schedules of plants, noting species, plant sizes and proposed numbers / densities within a planting schedule and any proposed green roofs and living walls. Also the method of planting including soil composition, tying, and staking, a maintenance care regime including mulching and watering and the replacement of any species that die within 5 years of planting. The development shall be implemented in accordance with the approved details and retained as such for the lifetime of the development.

REASON: To ensure a satisfactory appearance and in the interest of local amenity and biodiversity in accordance with Policies 53, 77 and 79 of the Waltham Forest Local Plan LP1 (2024).

17. Subject to the recommendations of a tree survey carried out by a suitably qualified arborist in line with British Standard 5837:2012, prior to occupation of any part of the development hereby permitted, a detailed Arboricultural Method Statement shall be submitted to and approved in writing by the Local Planning Authority. Such details should include protection measures, foundation design, root barriers and any other steps required to ensure the protection of the trees on and adjacent to the site. The details shall be implemented as approved and thereafter maintained for the lifetime of the development.

REASON: To ensure a satisfactory appearance and in the interest of local amenity and biodiversity in accordance with Policies 53, 77, 79 and 80 of the Waltham Forest Local Plan LP1 (2024).

18. Prior to the commencement of the development on site, notwithstanding site investigation work, no other work including any site clearance or demolition shall take place until a Biodiversity Gain Plan has been prepared in accordance with the ACD Environmental, Biodiversity Impact Calculator Report, Revision 6 13<sup>th</sup> March 2025 and submitted to and approved in writing by the Local Planning Authority. The development shall be implemented in full and retained thereafter in accordance with approved Biodiversity Gain Plan, failure to achieve 10% Biodiversity Net Gain or any shortfall, will require for the developer to either enter "A Biodiversity Offsetting Scheme" or "Statutory Biodiversity Credits" as set out in the S106 Agreement.

REASON: To ensure the development delivers a biodiversity net gain on site in accordance with Schedule 7A of the Town and Country Planning Act 1990, Policies G6 of the London Plan (2021) and Policy 79 of the Waltham Forest Local Plan LP1 (2024)

19. Prior to first occupation of any part of the development hereby permitted, details of habitat enhancement shall be submitted to and approved in writing by the Local Planning Authority. Details shall include the number and type of habitat bricks and boxes proposed for birds, bats and invertebrates and details of the permeability of site boundaries for ground-based wildlife.

REASON: In the interest of biodiversity in accordance with Policies 53, 77, 79 and 80 of the Waltham Forest Local Plan LP1 (2024).

**Waste Management:**

20. Prior to first occupation of any part of the development hereby permitted, a Waste Management Strategy which sets out a scheme for the storage and disposal of waste and recycling, including details of methods for collection and enclosures, shall be submitted to, and approved in writing by the Local Planning Authority. The development shall be implemented in accordance with the approved details and the refuse stores brought into use prior to first occupation of any part of the development hereby permitted and shall thereafter be retained for the lifetime of the development.

REASON: In the interests of highway and pedestrian safety in accordance with Policy 93 of the Waltham Forest Local Plan LP1 (2024).

**Energy and Sustainability:**

21. The units hereby permitted shall be constructed to achieve not less than BREEAM 'very good' in accordance with the submitted Energy Report (or the equivalent standard in such measure of sustainability for non-residential building design which may replace that scheme). The units shall not be occupied until formal certification has been issued confirming that not less than 'very good' has been achieved for each, and this certification has been submitted to, and approved in writing by, the Local Planning Authority."

REASON: In the interest of sustainability, energy efficiency and to provide a high-quality development in accordance with Policy 87 of the Waltham Forest Local Plan LP1 (2024).

22. Prior to the occupation of any part of the development hereby permitted, a report demonstrating how the scheme reduces the carbon dioxide emissions of the development by at least 35% compared to the 2021 Building Regulations shall be submitted to, and approved in writing by, the Local Planning Authority. The report shall reference the measures set out in the Energy Statement accompanying the planning application but shall explain what measures have been implemented in the construction of the development. The development and energy efficiency measures shall thereafter be retained.

REASON: In the interests of sustainability and energy efficiency of the development and to meet the requirements of Policy SI 2 of the London Plan (2021) and Policy 85 of the Waltham Forest Local Plan LP1 (2024).

**Water and Drainage:**

23. No above ground works for the development shall take place until details of a drainage scheme including reference to SuDs and to restrict runoff from the site to greenfield runoff rate of 2.0l/s have been submitted to and approved in writing by the Local Planning Authority. The drainage scheme shall include flow control design, discharge hydrograph, construction details and rainwater harvesting potential, details of its design, implementation, adoption, maintenance, and management.

No development shall take place except in accordance with the approved details, which shall be installed prior to first occupation of any part of the development hereby

permitted and thereafter retained and maintained as such for the lifetime of the development.

REASON: To mitigate the risk of flooding, ensure that the development is adequately drained, and minimise the use of water in the interests of future health of occupiers of the development and to protect pollution of groundwater in accordance with Policies 90 and 91 of the Waltham Forest Local Plan LP1 (2024).

24. No piling shall take place until a Piling Method Statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) and piling layout plan including all Thames Water wastewater assets, the local topography and clearance between the face of the pile to the face of a pipe has been submitted to and approved in writing by the Local Planning Authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved Piling Method Statement and piling layout plan.

REASON: The proposed works will be in close proximity to underground sewerage utility infrastructure and in the interests of future health of occupiers of the development and to protect pollution of groundwater in accordance with Policies 90 and 91 of the Waltham Forest Local Plan LP1 (2024).

25. No development shall be occupied until confirmation has been provided that either:- all water network upgrades required to accommodate the additional demand to serve the development have been completed; or a development and infrastructure phasing plan has been agreed with Thames Water to allow development to be occupied. Where a development and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan.

REASON: The development may lead to no / low water pressure and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development in accordance with Policy 68 of the Waltham Forest Local Plan LP1 (2024).

**Contamination:**

26. No development shall take place until a scheme to address the risk associated with site contamination has been submitted to and approved in writing by the Local Planning Authority:

a). A ground investigation based on the findings of the Desk Study Report to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site.

b). The results of the investigation and revised risk assessment and based on these, in the event that remediation measures are identified necessary a remediation strategy shall be submitted giving full details of the remediation measures required and how they will be undertaken.

c). A verification report providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy are complete.

d). In the event that additional significant contamination is found at any time when carrying out the approved development, it must be reported immediately to the Local Planning Authority and no further development shall take place until a revised remediation strategy has been submitted to and approved in writing by the Local Planning Authority.

Any investigation and risk assessment must be undertaken in accordance with the Environment Agency's Model Procedures for the Management of Contaminated Land (CLR11).

REASON: To ensure that the development can be carried out safely without unacceptable risks to workers, neighbouring residents, and other off site receptors and risks from land contamination to future users of the site and neighbouring land, together with those to controlled waters, property, and ecological systems, are minimised, in accordance with Policy 48, 89 and 90 of the Waltham Forest Local Plan LP1 (2024).

**Archaeology:**

27. No demolition or development shall take place until a stage 1 written scheme of investigation (WSI) has been submitted to and approved by the Local Planning Authority in writing. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, and the programme and methodology of site evaluation and the nomination of a competent person(s) or organisation to undertake the agreed works.

If heritage assets of archaeological interest are identified by stage 1 then for those parts of the site which have archaeological interest a stage 2 WSI shall be submitted to and approved by the Local Planning Authority in writing. For land that is included within the stage 2 WSI, no demolition / development shall take place other than in accordance with the agreed stage 2 WSI which shall include:

- A. The statement of significance and research objectives, the programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works.
- B. Where appropriate, details of a programme for delivering related positive public benefits.
- C. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the stage 2 WSI.

REASON: In order to protect historic assets of archaeological interest that may be present on site, which the Local Planning Authority seeks to ensure investigated and conserved, in compliance with Policy 73 of the Waltham Forest Local Plan LP1 (2024).

28. No demolition shall take place until a written scheme of historic building investigation (WSI) has been submitted to and approved by the Local Planning Authority in writing. For buildings that are included within the WSI, no demolition or

development shall take place other than in accordance with the agreed WSI, which shall include the statement of significance and research objectives, and:

- A. The programme and methodology of historic building investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works.
- B. The programme for post-investigation assessment and subsequent analysis, publication and dissemination and deposition of resulting material. This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the stage 2 WSI.

REASON: In order to protect historic assets of archaeological interest that may be present on site, which the Local Planning Authority seeks to ensure investigated and conserved, in compliance with Policy 73 of the Waltham Forest Local Plan LP1 (2024).

**Safety and Security:**

29. The development hereby approved, shall achieve Secured by Design Certification.

- a) Prior to above ground works, details of the measures to be incorporated into the development demonstrating how the development can achieve Secure by Design Certification, shall be submitted to, and approved in writing by the Local Planning Authority, in consultation with the Metropolitan Police Designing Out Crime Officers. The development shall be carried out in accordance with the agreed details.
- b) Prior to the first occupation, the development shall achieve a Certificate of Compliance to the relevant Secure by Design Guide(s) submitted to and approved in writing by the Local Planning Authority in conjunction with the Metropolitan Police and thereafter shall be fully retained and maintained as such for the lifetime of the development.

REASON: In the interest of security and to protect the living conditions of existing and future occupiers in the locality in accordance with Policy D11 of the London Plan (2021) and Policy 58 of the Waltham Forest Local Plan LP1 (2024).

30. The development shall be carried out in accordance with the submitted Fire Statement dated 24<sup>th</sup> July 2024. The development shall be implemented with the details contained within the Fire Statement hereby approved and retained as such for the lifetime of the development.

REASON: In order to protect the living conditions and safety and security of the occupants in line with Policies D5 and D12 of the London Plan (2021).

**Boundary Treatment:**

31. Prior to the construction of roof slab level, details relating to the siting, design and height and finish of all new walls, gates, fencing, railings, and other means of enclosure shall be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out solely in accordance with the approved details, prior

to the first occupation of any part of the development hereby approved and thereafter shall be fully retained and maintained accordingly for the lifetime of the development.

REASON: In the interest of general visual amenity, and amenity of neighbouring occupants, in accordance with Policy 53 of the Waltham Forest Local Plan LP1 (2024).

**Wheelchair User Rooms:**

32. At least a total of 12 of the student rooms shall be designed to M4(2) wheelchair adaptable standards and at least 12 student rooms shall be designed to M4(3) wheelchair accessible standards hereby permitted. All wheelchair user rooms must provide sufficient footprint and drawings must demonstrate that they can achieve a fully accessible layout.

REASON: To ensure inclusive development in accordance with Policy D7 of the London Plan (2021) and Policy 16 of the Waltham Forest Local Plan LP1 (2024).

**Student Management Plan:**

33. Prior to first occupation of any part of the development hereby permitted, a Student Management Plan shall be submitted to and approved in writing by the Local Planning Authority. Details shall include the management of move-in and move-out times shall be provided for approval and thereafter maintained.

REASON: To ensure that adequate arrangements are made for pedestrian and vehicular movements to and from the site and to ensure that the operational management of the development has no harm on the amenity of local residents in accordance with Policy H16 of the London Plan (2021) and Policy 64 of the Waltham Forest Local Plan LP1 (2024).

**Use Class E Restriction:**

34. The commercial use (Class E) hereby permitted shall operate only within Use Class E of the Use Classes Order 1987 (as amended), excluding E(f) creche, day nursery or day centre. No change of use of this premises that would otherwise be permitted by the Use Classes Order 1987 (as amended) or the Town and Country Planning (General Permitted Development) Order 2015 (or any order revoking and re-enacting that order) shall be carried out without planning permission having first been obtained in writing from the Local Planning Authority.

REASON: To safeguard the amenities of neighbouring occupiers in accordance with Policy 57 of the Waltham Forest Local Plan LP1 (2024).

**Infill Property:**

35. The infill property fronting William Street hereby permitted shall operate only as student accommodation (within Use Class sui generis) of the Use Classes Order 1987 (as amended) or the Town and Country Planning (General Permitted Development) Order 2015 (or any order revoking and re-enacting that order).

REASON: To safeguard the amenities of neighbouring occupiers in accordance with Policy 57 of the Waltham Forest Local Plan LP1 (2024).

## INFORMATIVES

1. To assist applicants, the Local Planning Authority has produced policies and written guidance, all of which is available on the Council's website, and which offers a pre-planning application advice service. The scheme was submitted in accordance with guidance following pre-application discussions and the decision was delivered in a timely manner.
2. Highway works under a S278 Agreement will be required upon completion of the development, prior to occupation.
3. Unless otherwise agreed, hardstanding levels within the red line boundary, and threshold levels should be designed to tie into existing public highway back of path levels. Discharge of surface water onto public highway will not be permitted.
4. It is the developer's responsibility to ensure all signage associated with the proposed development (i.e., street nameplates, building names, and door numbers) are erected prior to occupation, as agreed with the Council's Street Naming / Numbering Officer.
5. It is an offence to place scaffolding, skip or hoarding on the highway without permission. Early contact with the Council's Network Operations is advisable, as it may affect the construction programme.
6. Written schemes of investigations will need to be prepared and implemented by a suitably professionally accredited archaeological practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London. Condition 27 is exempt from deemed discharge under Schedule 6 of The Town & Country Planning (Development Management Procedure) (England) Order 2015.
7. For information on the NRMM Low Emission Zone requirements and to register NRMM, please visit <http://nrmm.london/>
8. Construction and demolition works audible beyond the boundary of the site should only be carried out between the hours of 0800- and 1800-hours Mondays to Fridays and 0800 and 1300 hours on Saturdays, and not at all on Sundays or Public / Bank Holidays.
9. The proposed development is located within 15m of Thames Waters underground assets, as such the development could cause the assets to fail if appropriate measures are not taken. Piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. <https://url.uk.m.mimecastprotect.com/s/c5gACWPV9cploYWU6f3loct1r> Should you require further information please contact Thames Water. Email: [developer.services@thameswater.co.uk](mailto:developer.services@thameswater.co.uk) Phone: 0800 009 3921 (Monday to



Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB

10. The developer can request information to support the discharge of Condition 25 by visiting the Thames Water website at [https://url.uk.m.mimecastprotect.com/s/it\\_ECXQW9I6prNzCVh2IWGIGR](https://url.uk.m.mimecastprotect.com/s/it_ECXQW9I6prNzCVh2IWGIGR). Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (e-mail: [devcon.team@thameswater.co.uk](mailto:devcon.team@thameswater.co.uk)) prior to the planning application approval.
11. The applicant must seek the advice of the MPS Designing Out Crime Officers (DOCOs). The services of MPS DOCOs are available free of charge and can be contacted via [DOCOMailbox.NE@met.police.uk](mailto:DOCOMailbox.NE@met.police.uk) or 0208 217 3813.