



9 Osier Way ,Leyton, E10 5SB

Planning Statement

Incorporating an Economic and Local Labour Statement and

Tall Buildings Assessment

Boyer

Report Control

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TABLE OF CONTENTS

1. INTRODUCTION	2
2. POCKET & THE MAYOR'S HOUSING COVENANT	6
3. THE SITE & SURROUNDING CONTEXT	9
4. PLANNING HISTORY	10
5. PRE-APPLICATION DISCUSSIONS	11
6. THE PROPOSED DEVELOPMENT	13
7. THE DEVELOPMENT PLAN	10
8. PLANNING ASSESSMENT	18
9. SUMMARY & CONCLUSIONS	48

1. INTRODUCTION

- 1.1 This Planning Statement is submitted in support of a planning application made on behalf of Pocket Living for the re-development of the land at no. 9 Osier Way, Leyton, E10 5SB.
- 1.2 The site is located within the Greater London Authority Blackhorse Lane and Northern Olympic Park Housing Zone. The site is also located within the London Borough of Waltham Forest's Lea Bridge and Leyton key growth area. Local and strategic planning policies identify these areas as opportune locations for intensification and outline the importance of optimising residential and non-residential densities. The proposal is considered to respond positively to these policy designations and would comprise sustainable re-use of an underutilised site for much-needed affordable homes.
- 1.3 Surrounding sites are in different stages of the planning process but all are proposing high density mixed use development in line with the local and strategic aspirations for the area in terms of regeneration and growth. Significant redevelopment of the area is set to take place to sustainably meet significant housing targets and commercial space targets.
- 1.4 The Application Site will be the first site to come forward for a full planning application within the Lea Bridge and Leyton key growth area. The site is bound to the east, south and west by the Bywaters masterplan. The Bywaters site has outline planning permission for a 730 unit residential led mixed use scheme which includes 10 buildings varying from 2-15 storeys in height.
- 1.5 In view of planning policy and the emerging context of the area, the proposal is for a high-density development, reflecting the scale and massing of the adjacent outline permission. The proposal will provide 210 self-contained one, two and three bedroom dwelling flats. The proposal would a 100% affordable housing development, providing 100% intermediate affordable housing tenure. The proposal will also provide private and communal amenity spaces, secure cycle and refuse storage facilities and hard and soft landscaping.
- 1.6 100% affordable housing can be provided by virtue of the Pocket Living model, which provides consistent sized flats with an emphasis on communal living and shared amenity space. Pocket provide intermediate affordable housing for local people, and is affordable housing that has the fully support of the Mayor of London in the form of a loan. In order to qualify for a Pocket home, buyers have to satisfy three essential criteria:
 1. Live or work in the Borough
 2. Be first time buyers
 3. Earn below the Mayor's income threshold.

- 1.7 The dwelling mix will comprise a majority of one bedroom units, designed to be smart, compact and aimed at buyers who's needs are not met by the social or private housing markets. In order to respond to the great need for affordable housing, the proposal maximises the affordable housing quantum whilst offering a high quality and highly sustainable development.
- 1.8 The London Borough of Waltham Forest model supported the Pocket model in 2016 by approving 45 one bed affordable Pocket homes on Gainsford Road (ref: 161661). This is considered a high quality development that is typical of a Pocket development.
- 1.9 The proposal involves the demolition of the existing commercial building on site, which is currently utilised as a healthcare waste facility. The buildings are of low architectural quality and do not make a positive contribution to the townscape. In contrast, the proposed development will provide an exceptionally designed development providing active frontages and new public realm that will create a significant enhancement to the area.
- 1.10 The further benefit of the scheme is the increase in employment provision of the site. B1C light industrial floor space will be provided at ground floor and mezzanine level and is designed to be flexibly used by dedicated making, mending and upcycling spaces along with possible pottery, carpentry and metal workshops and print making. The space is designed to be flexible in its adaptability and it is anticipated that numerous light industrial businesses would be able to use the space. The proposal will create modern, efficient and flexible units that will overall support a greater number of jobs than currently offered on site. A modest café unit (use class A1) will also be provided, predominantly to serve the new light industrial units, but also the existing and proposed local residents, while not having a significant impact on existing or approved retail provision.
- 1.11 Overall, the proposal provides an exceptional development which optimises the site's potential for affordable housing and commercial space. The density and scale of the development would integrate successfully into the evolving fabric of the area, regenerating the site and making a significant contribution to much needed affordable housing. The proposal would improve the employment opportunities compared to the existing use and improve the public realm and access through the area, contributing to improved pedestrian and cycle routes.
- 1.12 This Planning Statement assesses the proposals against the policies in the Development Plan and other material considerations, which are relevant to the determination of the application. The Statement is structured as follows:
- Section 2- provides an explanation of the Pocket model and the Mayor's Housing Covenant;
 - Section 3 - details the relevant planning history;
 - Section 4- describes the site and surrounding context;
 - Section 5- details the pre-application discussions;
 - Section 6- details the proposed development;

- Section 7- provides an overview of the principle national, regional and local planning policy and guidance;
- Section 8- provides an assessment of the proposal against the provisions of the Development Plan and other material considerations; and
- Section 9 -concludes the findings of the assessment of the proposed development.

1.13 This Planning Statement should be read in conjunction with the following additional documents, which accompany the application:

- Signed and dated statutory application forms prepared by Boyer;
- A complete set of existing and proposed plans including a Site Location Plan prepared by Waugh Thistleton Architects;
- Design and Access Statement prepared by Waugh Thistleton Architects;
- Transport Assessment prepared by TPP;
- Travel Plan prepared by TPP;
- Statement of Community Involvement prepared by Four Communications;
- Servicing, Delivery and Waste Management Plan prepared by TPP;
- Draft Construction and Demolition Logistics Plan prepared by Pocket Living;
- Energy and Sustainability Statement prepared by TÜVSÜD;
- Archaeological Desk Based Assessment prepared by CgMS;
- Ecology Survey prepared by RPS;
- Arboricultural report prepared by RPS;
- Wind Desktop Study prepared by FD Global;
- Noise Assessment prepared by KP Acoustics;
- Air Quality Assessment prepared by Air Quality Assessments Ltd;
- Flood and Surface Water Assessment prepared by Robert Bird Group;
- Contamination Reports prepared by Geo Environmental;
- Landscaping Design Statement prepared by BD Landscaping;
- External Lighting Statement prepared by TUV SUD;
- Ventilation Statement prepared by TUV SUD;
- Access Statement prepared by Withernay Projects;
- Fire Strategy Statement prepared by JGA;

- Daylight and Sunlight assessment prepared by Rights of Light Consulting;
- Affordable Housing Statement prepared by Boyer; and
- Health Impact Assessment prepared by Boyer.

2. POCKET & THE MAYOR'S HOUSING COVENANT

Pocket

- 2.1 Pocket is an award-winning developer that provides a unique type of intermediate affordable housing to Londoners on low to medium incomes. Pocket homes are specifically targeted at helping those working Londoners who fall between the social housing and private housing markets. Pocket provides these people with an opportunity to buy their own home at an affordable price, own their own home outright, and eventually move up the housing ladder.
- 2.2 Pocket homes are purchased on a 100% equity basis with no public subsidy. Sale prices are set at 20% beneath open market levels.
- 2.3 Through the lease conditions, provisions and clauses within the S106 Agreement, Pocket ensures that its homes remain affordable in perpetuity. This distinguishes Pocket homes from shared-ownership homes, whose buyers can, over time, acquire additional equity (termed 'staircasing') until they own 100% equity and can sell the property freely on the open market. Pocket homes are not available to buy-to-let investors.
- 2.4 Pocket homes are affordable because of the way they are designed. They are smart, compact dwellings of 38m², aimed at single-occupancy living. The compact size enables them to be built to a high specification with low maintenance costs and low service charges. Pocket developments are sustainable, Lifetime Homes compliant and include high quality communal amenity areas.
- 2.5 Pocket's first completed development was in the London Borough of Camden and won a Camden Building Quality Award, was highly commended in the Evening Standard New Homes Awards and was shortlisted for the National Housing Design Awards in 2009. It also received a Building for Life Silver Standard Award.
- 2.6 Following these achievements, a Pocket scheme in Westminster won the RIBA 2013 London Regional Award, the RICS London 2013 Residential Award and was Best Development in the Affordable Homes Sector at the Evening Standard Homes and Property Awards 2012.
- 2.7 In more recent years a Pocket scheme in Hackney won the award for Best First Time Buyer Home at the Evening Standard Homes and Property Awards 2016. At the National Housing Awards of the same year Pocket also won the award for Most Innovative Specialist Solution. One of Pocket's most recent developments, constructed in Wandsworth, was a finalist for the Housing Project Award at the Sunday Times British Homes Award in 2017.
- 2.8 Pocket recently won the prestigious RIBA London Award 2019 for their 27-storey emerald green glazed terracotta building at Mapleton Crescent in Wandsworth.

Mayor of London's Housing Covenant and Innovation Fund

- 2.9 In September 2012, the GLA published the Mayor's Housing Covenant (homes for working Londoners).
- 2.10 The Mayor acknowledges that for many Londoners on modest incomes, London's current housing market is not working. Hard-working Londoners that occupy key positions in London's social infrastructure are often priced out of the private housing market and overlooked as a priority for scarce affordable rented accommodation. This forces these Londoners to look outside the borough they work in and contribute to, increasing their commuting times and removing them from their local communities.
- 2.11 The premise of the Housing Covenant is that those who work hard for London's economy should benefit from its success. To do this the Mayor recognises that the mid-market offer for these people must be addressed through the provision of more flexible housing products. The alternative is that London risks losing a significant proportion of its skilled workforce, to the detriment of London's economy and social fabric.
- 2.12 The Mayor's Housing Covenant made available up to £100 million to stimulate the supply of intermediate housing. This helped an initial 10,000 Londoners and established a ten-year revolving fund so that this investment can continue to help future generations onto the housing ladder.
- 2.13 The Mayor of London has put Pocket at the forefront of delivering the housing he seeks through his Housing Covenant, awarding Pocket a £21.7 million loan in 2013. In 2017 he invested a further £25m in Pocket from the Mayor's Innovation Fund to boost new factory-built affordable homes for first-time buyers in the capital. This will see Pocket start on 1,059 new homes by March 2021, with a third expected to be built using modern methods of construction. The Mayor's funding will help finance site purchases and will be paid back in full by the end of the next decade. The Mayor is supporting innovative schemes like this as he believes off-site construction is a key tool to tackle London's housing crisis and getting homes built more quickly.
- 2.14 Pocket has achieved planning permission previously in Waltham Forest for a scheme containing 45 one bed affordable homes and shared communal spaces on Gainsford Road. Pocket has also gained permission in other boroughs such as Barking, Camden, Hackney, Haringey, Lewisham, Westminster, Hammersmith and Fulham, Hounslow, Lambeth, Ealing, Southwark, Wandsworth and Kingston and Croydon.

The Mayors Housing Zones

- 2.15 In addition to his Housing Covenant and Innovation Fund, which aims to stimulate the development of intermediate affordable housing, the Mayor is also attempting to accelerate housing development across London in areas with high potential for growth.

- 2.16 A total of £600m in funding has been made available by the Mayor and government for the construction of around 75,000 new homes across London, providing 150,000 associated jobs over the next 10 years. The 31 Zones will collectively provide more than £30bn of investment, major station upgrades, new schools, new bridges and new community amenities.

3. THE SITE & SURROUNDING CONTEXT

The Site

- 3.1 The site is located south of and accessed from Osier Way and comprises a rectangular area of 0.53 hectares in size. Pursuant to an earlier planning consent, the site is in operation as a healthcare waste facility (use class B2). The built form on site is a warehouse style building, circa 8m in height, surrounded by hardstanding.
- 3.2 The site is bound directly to the south and the west by the Bywaters Waste Management Centre. Outline planning permission has been approved for the comprehensive re-development of this site for a mixed use scheme comprising ten buildings ranging from 2 to 15 storeys in height, 730 residential units, up to 4,500sqm of flexible commercial floor space, a two-form entry primary school, re-provision of a new Thames Water storm water facility and associated public realm landscaping and parking.
- 3.3 To the east of the site (across Auckland Road – which is in Bywaters ownership) is the Score Leisure Centre. It is understood that LBWF have a development partner, Taylor Wimpey, to deliver a mixed-use development of this site which includes circa 800 homes, a civic square, leisure centre and health hub.
- 3.4 The Oliver Road allotments lie to the north of the site. The surrounding area also offers the Auckland Road allotments and Coronation Gardens which offers further green areas in proximity to the site.
- 3.5 The site is in a Borough Employment Area (ref: BEA3). However, it also sits within the Northern Olympic Fringe Area and Phase 2 of the Blackhorse Lane and Northern Olympic Park Housing Zone, which identifies a target to provide at least 2,500 new homes over 10 years. The site lies in an area of significant change in context and land uses as a result of the aforementioned status. LBWF have prepared a Vision Document for the area setting out design and delivery aspirations for the site to create a new mixed use neighbourhood including residential uses.
- 3.6 The site is well connected to the highway network and public transport network, located close to the A12 and being within walking distance to Leyton Underground Station and the bus services along Leyton High Road. Although in close proximity to underground and overground stations the PTAL rating of the site is 2. However, it is understood that this is likely to rise as a result of planned public transport improvements which are being considered as part of the implementation of the Draft Coronation Square Supplementary Planning Guidance.
- 3.7 The site also lies within Flood Zone 1, an Air Quality Management Area and an Archaeological Priority Zone.

4. PLANNING HISTORY

Planning History

- 4.1 The planning history of the site is limited. An application was submitted in 2014 (ref 2014/2079/CLP) to request a Certificate of lawfulness for the use of a healthcare waste facility. The site has been in B2 use since this time.
- 4.2 More recently, a request for a screening opinion was submitted to LB Waltham Forest, under Regulation 5 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. The council summarised the following:
- ‘The proposal would result in a form of development that better reflects the prevailing and emerging character of the area introducing a residential-led scheme with ‘good neighbour’ light industrial uses. The development would result in significant public realm and landscaping enhancements and the introduction of renewable energy across the site. The development would therefore reduce environmental impact when considered in isolation or cumulatively with any other development in the locality.’
- 4.3 This screening opinion concluded that the development does not fall within a sensitive location as described in the EIA Regulations, and the proposal would not have significant environmental impact on the site and the surrounding area to warrant the need for an EIA to be submitted.
- 4.4 Neighbouring planning history includes an outline planning permission for 730 residential units was granted in April 2016 on the adjacent Bywaters site to the east (ref: 160923). The outline permission includes the demolition of the existing buildings and creation of 2 to 15 storey buildings and 4,500sqm of commercial floorspace.

5. PRE-APPLICATION CONSULTATION

Pre-application discussions

- 5.1 Detailed pre-application discussions have been held with Planning, Design, Housing and Transport Officers from LBHF. The proposals have also been presented to the Council's Design Review Panel. Pre-application consultation also included discussions with the Greater London Authority (GLA), and Transport for London (TfL), as well as extensive public consultation with the public.
- 5.2 The extensive pre-application consultation has informed the proposals for which planning permission is now sought. Design changes have been introduced to address comments raised throughout the pre-application consultation process.
- 5.3 In summary, the Applicant has engaged in extensive pre-application discussions with LBWF, meeting to discuss several revisions of the scheme. LBWF Planning and Design Officers have been supportive of the proposed affordable housing provision and offered advice and design guidance to assist in bringing forward a high quality scheme. LBWF Housing Officers have provided feedback on the quantum of existing employment floor space and layout and advised that the scheme must be developed in consideration of the adjoining sites within the Bywaters masterplan.

Design Review Panel

- 5.4 On 9th October 2018, the proposals were presented the Council's Design Review Panel at the Design Council. Formal written feedback was provided on 23rd October 2018 and a summary of the Panel's comments and how these have been responded to by the scheme architects, Waugh Thistleton, is included within the Design and Access Statement – Section 6.2 'LBWF Consultation'.

Greater London Authority

- 5.5 The applicant has also engaged with the Greater London Authority (GLA) to understand their views on the principle of development and its compliance with the London Plan. Pre-application advice from the GLA confirmed that the principle of a residential-led mixed-use scheme was strongly supported by the GLA. The officers advised on the quantum of commercial floor space, wheelchair accessible units and transport. The applicant has incorporated feedback and advice to design a scheme, which maximises the affordable housing provision on site whilst delivering a high quality development.

Community Engagement

- 5.6 The accompanying Statement of Community Involvement prepared by Four Communications details the applicant's consultations with the local community, including local people, local amenity groups, businesses and local Councillors.
- 5.7 The consultation programme sought to engage with all sections of the community to ensure that as many people as possible had the opportunity to take part in the process. This responds to LBWF's published guidance.

- 5.8 In order to ensure the consultation programme met the guidance, the Applicant also consulted the following stakeholders:
- Head of Neighbourhoods for Leyton Orient Trust
 - East End Trades Guild
 - Oliver Road Allotments
 - Leader of the Council
 - Leyton Ward Councillors
 - Lead Member for Housing
- 5.9 Two public exhibitions took place in the Score Centre Community Building in July and September 2018. Information boards for the proposals were available for interested members of the public to view. Consultation feedback forms were completed by attendees, and a review of the comments is provided within the Statement of Community Involvement.
- 5.10 Public consultation also involved door to door engagement which involved members of the project team knocking on resident's doors near to the site. Residents were provided with an introduction to Pocket's model and the initial site proposals. Verbal feedback was recorded and the main themes are documented in detail within the Statement of Community Involvement.
- 5.11 Questions were raised relating to a number of issues including the impact of construction works on local residents, transport impact, and public realm. Details relating to these queries are covered within the Construction Logistics Plan, Transport Assessment and the Design and Access Statement, all of which are submitted with this planning application.

6. THE PROPOSED DEVELOPMENT

6.1 Planning permission is sought for:

“Demolition of existing building and construction of a 6 to 13 storey building accommodating 210 Pocket (100% affordable) residential units and 1,096sqm of light industrial/commercial floorspace and 40sqm of A1 cafe floorspace, together with associated amenity space, servicing, cycle storage, accessible car parking spaces and public realm improvements.”

6.2 The proposals comprise a ‘C-shaped’ perimeter building varying between 6 and 13 storeys, which will complement the outline consent of the adjacent Bywaters site. The footprint of the building will establish a new street-facing elevation along Osier Way and Auckland Road, improving the quality of urban realm in this location. The proposal will appear as five separate blocks that will be connected with setbacks in the façade, helping to break up the overall massing.

6.3 The ground floor on the eastern side of the site, including a part mezzanine level will re-provide the commercial floor space in the form of 1,096sqm B1c light industrial floorspace and 40sqm A1 floorspace ensuring there is no net loss of employment floorspace in comparison to the existing 900sqm currently occupying the site. The proposed light industrial workshop space will be flexible to cater for many B1c users, vastly improving the commercial viability and employment capacity on site. The following table displays the split between proposed residential and commercial floorspace.

Use Class	Floorspace (GIA) sqm
Residential (Use Class C3)	14,531 sq.m
Light Industrial Floorspace (Use Class B1c)	1,096 sq.m
Cafe unit (Use Class A1)	40 sq.m
Total combined floorspace	15,667 sq.m

- 6.4 The proposed building will surround a central courtyard area, which will provide 4 disabled car parking bays as well as an access point and turning bay for delivery vehicles for the light industrial space and for emergency vehicles. Vehicle access into the site will be from Osier Way via a fob activated gate that provides access into the courtyard.
- 6.5 Aside from the disabled parking spaces the scheme will be car-free and the flats would be restricted from obtaining car parking permits in existing or future CPZ's.
- 6.6 The proposals will comprise the provision of 255 cycle parking spaces which will comprise 244 spaces (244 long-stay and five short-stay) allocated to the residential development and six spaces (five long-stay and one short-stay) allocated to the light industrial units. The proposed cycle parking provision will be located at the western and southern ends of the site. The proposed cycle parking provision also includes space for 13 non-standard bicycles.
- 6.7 Three cores will provide access to the residential accommodation, located in the centre of the three sides of the building. One would be accessed off Osier Way, one would be accessed off Auckland Road and one would be accessed from the internal courtyard. The Osier way residential entrance will provide access to the main reception and concierge where deliveries will arrive. Located next to the cores would be the refuse and recycling stores with space provided on Osier Way for the bins to be located on collection day. The bins would be moved between the bin store and the street by the on site management team on collection day.
- 6.8 The 210 residential homes will provide 100% intermediate affordable housing. The following table summarises the unit mix

Flat Type	Proposed Unit Mix	
	Units No.	% Mix
1 bed	176	84
2 bed	16	14
2 bed adaptable units	13	6
3 bed	5	2
Total	210	100%

- 6.9 The development provides 13 M4 (3) 'wheelchair user' dwellings designed to be easily adaptable for occupiers who are wheelchair users. These are located in Block E.

7. THE DEVELOPMENT PLAN

- 7.1 Section 38(6) of the Planning & Compulsory Purchase Act (2004), states that the determination of a planning application must be made in accordance with the development plan, unless material considerations indicate otherwise.
- 7.2 The Development Plan comprises the London Plan (as amended 2016) and the Council's adopted Core Strategy (2012) and the Development Management Policies document (2013).
- 7.3 Also relevant to the determination of the application is the Council's Site Specific Allocations document (preferred options stage, 2013). The Council have also adopted supplementary planning documents which are relevant to the proposals such the Urban Design SPD and the Inclusive Design SPD.
- 7.4 The National Planning Policy Framework (2012) contains national planning policy and sets out the Government's intentions for the planning system and how these are expected to be applied. The Government's National Planning Practice Guidance is also relevant to the determination of the application.
- 7.5 The planning policy relevant to the consideration of the application therefore comprises three levels of policy – national, regional, and local.

National Planning Policy Framework (July 2018)

- 7.6 The new NPPF was published on 24th July 2018 and advises that the primary objective of development management is to foster the delivery of sustainable development and not to hinder or prevent development. The NPPF encourages engagement in pre-application discussions, consultation and generally front-loading the planning application process. It also sets out that in determining planning applications, local planning authorities should apply the presumption in favour of sustainable development. The National Planning Policy Framework is very clear that development must not be prevented simply because it will cause change.
- 7.7 The presumption in favour of sustainable development, which should be seen as a golden thread running through both plan making and decision-taking, involves seeking positive improvements in the quality of the built environment, including replacing poor design with better design, improving the conditions in which people live, and widening the choice of high quality homes.
- 7.8 The NPPF places weight on the effective use of land by reusing land that has been previously developed. It states that planning should promote mixed use developments and encourage multiple benefits from the use of land in urban areas. Patterns of growth should be actively managed to make the fullest possible use of public transport, walking and cycling, and significant development should be focussed in locations which are sustainable.

- 7.9 Paragraph 59 of the NPPF emphasises the Government’s objective of significantly boosting the supply of homes, and that “it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.”
- 7.10 Paragraph 60 of the NPPF states that “small and medium sized sites can make an important contribution to meeting the housing requirement of an area and are often built-out relatively quickly.”
- 7.11 Paragraph 71 states that “Local planning authorities should support the development of entry-level exception sites, suitable for first time buyers”
- 7.12 The National Planning Policy Framework Annex 2: Glossary defines Affordable Housing in the following terms:
- “Housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers); and which complies with one or more of the four definitions”.
- 7.13 One of which is Discounted Market Sales Housing, which is defined as:
- “that sold at a discount of at least 20% below local market value. Eligibility is determined with regard to local incomes and local house prices. Provisions should be in place to ensure housing remains at a discount for future eligible households.”
- 7.14 Pocket homes qualify as affordable housing under this definition (as opposed to so-called ‘low-cost’ market housing) because they will satisfy key criteria being:
- Restricted eligibility – all buyers must meet the relevant eligibility criteria which will be agreed in conjunction with the Council’s housing department. Eligibility is likely to be restricted by a maximum income level and to those living and working within the borough for an agreed period.
 - Provisions to remain at an affordable price – the lease of Pocket homes will include conditions that ensure that owners follow the same eligibility rules when selling (or renting) their home. These restrictions are also enshrined within the s106 agreement.
 - Cost below open-market levels – pricing is agreed with boroughs before units are released onto the market. Pocket homes are sold at a discount of 20% to open-market value

The London Plan (as amended 2016)

- 7.15 The London Plan is the overall strategic plan for London, setting out an integrated economic, environmental, transport and social framework for the development of London over the next 20–25 years. The Mayor has confirmed that the Plan is consistent with the policies contained within the NPPF, in particular the presumption in favour of sustainable development.
- 7.16 The London Plan sets out policies to ensure there is an adequate supply of housing for the city's projected population growth. According to the Plan (table 1.1), the population of the London Borough of Waltham Forest is forecast to increase by 17.3% from 2011 to 2036.
- 7.17 The Mayor's stated Strategic Policies aim to ensure that "London is a city that meets the challenges of economic and population growth in ways that ensure a sustainable, good and improving quality of life and sufficient high quality homes and neighbourhoods for all Londoners and help tackle the huge issue of deprivation and inequality among Londoners, including inequality in health outcomes."
- 7.18 The principle of establishing a residential use of the site is supported by the London Plan's policy objectives which state that the most efficient use of land should be achieved. At paragraph 1.48, it is stated that London must plan for a growing population in a way that does not worsen quality of life for London as a whole which means that *"we will have to ensure we make the best use of land that is currently vacant or under-used, particularly in east London where the greatest potential exists."*
- 7.19 Policies within the London Plan are consistent with the thrust of the policies contained within the NPPF as they recognise the need to encourage the effective use of land by reusing land that has been previously developed (brownfield land). Paragraph 2.4 provides that *"the most efficient use will have to be made of London's limited reserves of land, identifying places with the potential for development on a strategic scale, and ensuring policies are in place to enable this to happen."*
- 7.20 Policy 3.1 seeks to ensure equal life chances for all. The Mayor is committed to ensuring equal life chances for all Londoners. Meeting the needs and expanding opportunities for all Londoners – and where appropriate, addressing the barriers to meeting the needs of particular groups and communities – is key to tackling the huge issue of inequality across London.
- 7.21 Policy 3.3 Increasing Housing Supply states that the Mayor will seek to ensure the housing need is met, particularly though the provision consistent with at least an annual average of 42,000 net additional homes across London. Table 3.1 sets out the borough housing targets. Boroughs should seek to exceed the relevant minimum annual average housing targets. The minimum target for Waltham Forest is 8,620 new homes over a 10-year period until 2025, which equates to 862 new homes annually.

- 7.22 Policy 3.3 provides that boroughs should identify and seek to enable additional development capacity to be brought forward to supplement these targets including the potential to realise brownfield housing capacity through intensification and (redevelopment of) surplus commercial capacity and surplus public land, particularly that with good transport accessibility.
- 7.23 Policy 3.4 seeks to ensure that the development potential of sites is maximised in order that housing potential is optimised. Table 3.2 provides guidance on the range of housing densities with regard to location and is a tool for increasing density in situations where transport proposals will change the public transport accessibility ranking.
- 7.24 Policy 3.5 concerns the quality and design of housing developments and states that these should be of the highest quality internally, externally and in relation to their context and to the wider environment, taking account of strategic policies in the Plan to protect and enhance London's residential environment and attractiveness as a place to live. Policy 3.5 refers to the minimum space standards at table 3.3 but states: "*Development proposals which compromise the delivery of elements of this policy may be permitted if they are demonstrably of exemplary design and contribute to achievement of other objectives of this Plan*".
- 7.25 Policy 3.8 concerns housing choice and provides that Londoners should have a genuine choice of homes that they can afford and which meet their requirements for different sizes and types of dwellings in the highest quality environments. It seeks to ensure that new developments offer a range of housing choices, in terms of the mix of housing sizes and types, taking account of the housing requirements of different groups, that all new housing is built to 'Lifetime Homes' standards and that ten per cent of new housing is designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users.
- 7.26 Policy 3.9 concerns mixed and balanced communities. It states that communities mixed and balanced by tenure and household income should be promoted across London through incremental small scale as well as larger scale developments which foster social diversity, redress social exclusion and strengthen communities' sense of responsibility for, and identity with, their neighbourhoods. They must be supported by effective and attractive design, adequate infrastructure and an enhanced environment.
- 7.27 Policy 3.10 defines affordable housing. Intermediate affordable housing is defined as "homes available for sale or rent at a cost above social rent, but below market levels. These can include shared equity (shared ownership and equity loans), other low cost homes for sale and intermediate rent, but not affordable rent."
- 7.28 It is relevant to note that in the Mayor's 14th Annual Monitoring Report (AMR), published September 2018.

- 7.29 In the 2016 AMR, to reflect Government's approach to shared ownership, a single £90,000 household income was introduced for intermediate housing; in effect removing the previous higher income cap for families in larger homes. However, recognising the different role that intermediate rented products play in meeting affordable housing need compared to shared ownership products and to ensure those rented products are genuinely affordable in line with the Mayor's London Living Rent product the cap for intermediate rented products will be reduced to a household income of £60,000 per annum, which is the income required to afford a two-bedroom London Living Rent home in the most expensive ward (Queen's Gate in Kensington and Chelsea).
- 7.30 Therefore, from April 2017 the costs, including service charges of intermediate ownership products such as London Shared Ownership and Discounted Market Sale (where they meet the NPPF and London Plan definition of affordable housing), should be affordable to households on incomes of £90,000 or less.
- 7.31 Paragraph 3.62 states that "increased provision of intermediate housing is one of the ways in which the supply of affordable housing can be expanded."
- 7.32 Policy 3.11 sets affordable housing targets. It states that provision of affordable housing provision should be maximised and that an average of at least 17,000 affordable homes are provided each year over the term of the Plan. In order to give impetus to a strong and diverse intermediate housing sector 40% of the affordable housing provision should be for intermediate rent or sale.
- 7.33 At Paragraph 3.65 it is stated that this 40% target has been informed by the role that intermediate housing can play in helping Londoners get a first step on the housing ladder, reducing the call on social/affordable rented housing, freeing up social/affordable rented homes, providing wider housing choices and securing a more balanced social mix on mono-tenure estates. Account has also been taken of the way intermediate housing development can extend the effectiveness of scarce public resources by increasing overall housing output through partnership working with the private sector.
- 7.34 Policy 3.12 concerns the negotiation of affordable housing. It is stated that the maximum reasonable amount of affordable housing should be sought when negotiating on individual private residential and mixed use schemes.
- 7.35 The London Plan recognises that in recent decades London's economy has been increasingly service-based, and this is likely to continue. It is stated that ensuring there is enough office space of the *right kind* in the *right places* is a key task for the London planning system.

Draft New London Plan

- 7.36 It is also worth noting that in November 2017, the Greater London Authority published their Draft London Plan. The plan has recently been consulted on and the GLA are in the process of reviewing the comments prior to preparing a submission version. As the Plan is in the early stages of its development, no material weight is applied to the policies within it.
- 7.37 The draft new London Plan allocates LB Waltham Forest a ten-year housing target of 17,940 new homes across the period 2019/2020 – 2028/2029. Annually this target averages to 1,794 homes a year, which is a vast increase to the current London Plan (2016) housing targets.

LBWF Core Strategy (2012)

- 7.38 Policy CS2 concerns improving housing quality and choice. In relation to housing growth, the policy provides that the Council will facilitate sustainable housing growth by prioritising development on previously developed land, particularly unused or underused land, focussing the delivery of new homes in the borough's growth areas and other key sites to meet or exceed the housing target over the plan period, making effective and efficient use of land by seeking to optimise housing densities and supporting initiatives to bring 1035 empty properties back into use over the plan period.
- 7.39 In relation to affordable housing, policy CS2 provides that the Council will maximise the number of quality affordable homes within the borough by aiming to provide at least 5,700 affordable homes over the plan period (50% of the total number of homes). The level of affordable housing will be assessed on a site by site basis.
- 7.40 Policy CS2 refers to creating mixed and balanced communities by seeking a range of home sizes and tenures in new development. It is stated that the Council will prioritise the need for larger homes of 3 bedrooms or more. High quality design will be required and new homes should be accessible to all members of the community. At paragraph 5.12 it is stated that "Given the urban nature of large parts of the Borough it is essential to make the most effective and efficient use of land in order to maximise housing supply. As a general rule, the Council will seek to optimise housing densities across the Borough". This will include affordable housing. Paragraph 5.18 provides that "given the significant level of need and the difficulties local residents have in accessing the housing market, the Council seeks to prioritise the delivery of affordable housing".
- 7.41 Paragraph 5.19 reveals that "the Council wants to encourage a more economically balanced community and will therefore seek a greater social mix in the Borough. Waltham Forest has experienced the trend of more people on higher and medium incomes moving out of the Borough than are moving in. This is largely due to the fact that they are unable to find suitable housing options to meet their needs".

- 7.42 Policy CS4 concerns minimising and adapting to climate change. The Council will tackle climate change locally and promote resource efficiency and high environmental development standards during design, construction, and occupation of new developments.
- 7.43 Policy CS5 concerns enhancing green infrastructure and biodiversity. Amongst protecting existing green spaces, the Council will ensure the adequate provision of allotments and other spaces to grow food and plants.
- 7.44 Policy CS6 relates to promoting sustainable waste management and recycling. The Council will require new development provides accessible, adequate and well-designed storage facilities for residual waste and recycling.
- 7.45 Policy CS7 concerns developing sustainable transport. The Council will facilitate growth and regeneration in a sustainable manner and promote sustainable travel. Car-free developments will be promoted.
- 7.46 Policy CS8 concerns making efficient use of employment land. The Council will facilitate sustainable economic growth by safeguarding and enhancing an appropriate range of sites and premises. At paragraph 11.2 the Council recognises that the need to cater for population growth, whilst also protecting the Borough's green assets, means that existing employment land will need to be used more efficiently in the future.
- 7.47 Policy text at Part B relates to development in Borough Employment Areas (BEA's). The aim of the policy is to increase and upgrade existing employment which could include the provision of jobs as part of a mixed use development. In such cases, priority is given to education, health and social infrastructure before considering residential use.
- 7.48 Policy CS15 concerns well designed buildings, places and spaces. It is stated that the Council's objective is to create positive, responsive and inclusive environments including buildings and spaces of high quality that contribute to the distinctiveness of neighbourhoods.

LBWF Development Management Policies (2013)

- 7.49 Policy DM1 provides that the Council will take a positive approach to considering development proposals that reflects the presumption in favour of sustainable development within the NPPF. The Council will work pro-actively with applicants to find solutions.
- 7.50 Policy DM3 concerns affordable housing provision. It is stated that in accordance with policy CS2 the Council aims to provide 50% of new housing to be affordable. The Council's policy text requires a tenure split in favour of social/affordable rented units.

- 7.51 Policy DM5 concerns housing mix. It is stated that the Council will seek all housing developments to provide a range of dwelling sizes and tenures particularly focussing on the provision of larger family sized homes. It is stated that the Council will generally not support development proposals containing only smaller homes (one and two bed).
- 7.52 Policy DM7 relates to external amenity and internal space standards. The Council will aim to ensure that all new residential development, is of the highest quality both internally and externally by seeking that proposals meet the Council's minimum internal space standards and the external amenity space standards. The policy states that the Council does not support studio flats or 1 bed, 1 person homes.
- 7.53 Policy DM10 concerns resource efficiency and high environmental standards. The Council will require developments to achieve the Council's stepped targets towards zero carbon by 2016 for residential development.
- 7.54 Policy DM11 concerns decentralised and renewable energy. It is stated that the Council will seek to reduce carbon emissions by requiring development to examine the feasibility of connecting to existing or future decentralised energy networks. Developments which seek to reduce carbon emissions through on-site renewable energy should ensure that the proposed system is appropriate and does not cause adverse effects.
- 7.55 Policy DM13 requires the co-ordination of land use and transport. The Council will ensure that development is properly integrated with the transport network and is supported by appropriate walking, cycling and public transport links. Where development is not within easy reach of public transport stops, applications will be required to promote sustainable travel measures and contribute to reducing car use.
- 7.56 Policy DM16 concerns car parking. The Council encourages car-free development in highly accessible locations and supports on-site car parking spaces designed for disabled people.
- 7.57 Policy DM24 concerns development on contaminated land.
- 7.58 Policy DM29 concerns design principles, standards and local distinctiveness. The Council will expect a high standard of urban and architectural design for all new development.
- 7.59 Policy DM30 concerns inclusive design and the built environment.
- 7.60 Policy DM32 relates to managing the impact of development on occupiers and neighbours.
- 7.61 Policy DM33 concerns improving community safety.
- 7.62 Policy DM34 concerns water supply and waste water infrastructure.
- 7.63 Policy DM35 concerns biodiversity and geodiversity.

8. PLANNING ASSESSMENT

Principle of Development

Residential land use

- 8.1 At a London-wide and local level, a strategic objective is to increase the supply of high quality homes and ensure that new housing meets local needs and aspirations. LBWF Policy CS2 sets out that the Council will work to exceed housing targets. The adopted London Plan places a target of 862 additional dwellings per year. The draft New London Plan vastly increases this target to 1,794 new homes per year.
- 8.2 London Plan Policy 3.33 outlines that the Mayor recognises the pressing need for more homes in London in order to promote opportunity and provide a real choice for Londoners in ways that meet their needs at a price they can afford. The policy emphasises that boroughs should seek to achieve and exceed the relevant minimum borough annual average housing targets.
- 8.3 Draft London Plan policy D6 (optimising housing density) requires that development proposals make the most efficient use of land to be developed at optimum density. Particular consideration should be given to the site context, connectivity and the capacity of surrounding infrastructure.
- 8.4 The Council's Core Strategy (paragraph 5.3) recognises that a growing population in the borough, along with smaller household size, are fuelling significant demand for new homes to buy and rent.
- 8.5 There is limited land within LBWF to accommodate significant population growth. The Core Strategy (paragraph 5.12) recognises that "given the urban nature of large parts of the Borough it is essential to make the most effective and efficient use of land in order to maximise housing supply". Development at sites including 9 Osier Way are vital to contribute towards meeting the targets whilst also reducing housing pressure on more valuable employment land.
- 8.6 Policy CS2 provides that the Council will facilitate housing growth by maximising the number of quality affordable homes in the borough by prioritising development on previously developed land, particularly unused or underused land; making effective and efficient use of land by seeking to optimise housing densities.
- 8.7 The brownfield site is also located within an area designated at both the local and strategic level as an area, which is opportune to optimise growth in both residential and commercial floorspace. At the local level, the site is situated within the Lea Bridge and Leyton key growth area in which Policy CS1 directs growth of up to 2500 new homes and identifies as having capacity for intensification and overall regeneration.

- 8.8 At the strategic level the site is also included within the Mayor's Lower Lee Valley Opportunity Area and the Olympic Legacy area, which identifies that the areas surrounding the main Olympic site could provide around 32,000 new homes and 1.35 million square metres of new and improved commercial floorspace.
- 8.9 The proposed development will provide 100% affordable housing. The development will optimise the affordable housing on the site whilst maintaining a high quality design, which relates positively to the overall strategy of the regeneration of the Lea Bridge and Leyton key growth area and the Mayor's Lower Lee Valley Opportunity Area, whilst offering 100% affordable housing.
- 8.10 Accordingly, pre-application responses from both LBWF and the GLA have confirmed that the principle of residential-led, mixed-use redevelopment of the site is acceptable.

Affordable housing need and demand

- 8.11 Housing need within the London Borough of Waltham Forest (LBWF) was assessed in the Strategic Housing Market Needs Assessment (SHMA) (2017) as a requirement for 1,810 dwellings per annum over the period 2014-2039.
- 8.12 House prices within the borough have risen sharply in recent years, suggesting a high degree of pressure within the housing market. From the period of 2006 - 2016 the mean house prices increased by 96% compared to the 2006-2016 period. This is a higher rate of increase than neighbouring authorities, and higher compared to the London-wide average of 85%. The most recent figures indeed show that Waltham Forest experienced the highest (15.7%) increase in house prices in England over the twelve months between January 2016 and January 2017.
- 8.13 As a result of this change, affordability (based on median sales prices and median earnings) in the borough has worsened greatly; the ratio has risen to about 1.8 times the national average. As reflected within the assessed affordable housing need, a vast amount of new housing provision will be required to meet affordable housing need which is a major challenge for the LBWF and is only likely to become more prominent as demand and house prices rise.
- 8.14 The SHMA has identified a substantial shortfall in the provision of affordable tenures of residential accommodation. The assessment identified a requirement to deliver 1,258 affordable housing units which represents 69% of the overall Objectively Assessed Need (OAN) for the borough.
- 8.15 The SHMA identifies that 38% of the net future annual affordable housing need is for housing at social rented sector rent levels, with about 1% of demand for housing at London Affordable Rent levels, and 61% for intermediate tenures.

- 8.16 This is further demonstrated within the council's *Building for the Future* (2008) strategy. It is noted that one of Waltham Forest's largest challenges is to target middle and modest income households who are locked out of home ownership. This population does not meet the criteria required to be allocated to social housing but yet can't afford the borough's high house prices. The strategy also states that this proportion of the population is economically vital for Waltham Forest and therefore it is important to support their housing needs.
- 8.17 Whilst there is an identified need for affordable family sized units, there is an evidenced need for smaller sized units too. The SHMA identifies that the characteristics of Waltham Forest are changing from an area which was once family-focussed towards an area catering for a growing single, professional area. As this population grows, it will be necessary for the borough to cater for the growing demand of smaller bed affordable units.
- 8.18 The SHMA provides estimates of dwelling size requirements by considering changes in the projected composition of household types which can then be taken into account in determining future size requirements. One reason for the projected increase in requirement for larger bedroom units is presented to be due to a reflection of the growing trend towards multi-adult households as opposed to the need for family sized dwellings.
- 8.19 The SHMA outlines that the growth of multi-adult households is considered to be a result of poor affordability, as a greater number of local professionals are unable to afford to buy or rent alone within the private market and as such turn to house shares. If there was a greater choice of affordable housing products which catered for the needs of this population, it is most likely that the need for larger-bedroom multi-adult households would decrease as a greater number of people would be able to afford to own a home as a single person.
- 8.20 It is important to acknowledge that although the SHMA identifies a need for larger bedroom units, the projection is based on the assumption that the borough's private market will still not cater for single adults in the future. LBWF needs to consider what the SHMA projections represent, as in the case for a need for larger bedroom units; there is an underlying pattern which could be solved by the provision for smaller sized affordable housing products which would satisfy both the need and aspiration of this segment of the population.
- 8.21 LBWF commissioned a research document titled *Housing for Young People in Waltham Forest* (2017). The research was commissioned by the council to investigate the housing needs of young people, and the trade-offs that people are willing to make so that local young people continue to call Waltham Forest their home.

- 8.22 It was identified that aspirations for home ownership were high amongst young people, however the majority of young people felt that home ownership in the borough would be unreachable. In response to the research, Waltham Forest concluded that many young people in the borough face severe housing pressures and as such there is a vital need to improve the range of housing options for young people, including increasing the amount of affordable housing within the Borough.
- 8.23 Overall, there is a clear and evidenced need to provide more affordable intermediate housing in the borough. In particular, there is an identified need for housing which meets the needs of local people who wish to stay living in LBWF yet are unable to get onto the Borough's private housing market. The provision of a high number of smaller sized units within the proposal will help to meet this great need by providing smaller housing units which are tailored to meet the social-economic profiles of first time buyers within the borough.

Redevelopment of Industrial Floor space

- 8.24 The site is currently occupied by a B2 general industrial use, in the form of a medical waste facility. The site is not a designated Strategic Industrial Location (SIL) nor is it a Locally Significant Industrial Location (LSIS) or a protected waste site. However, the site is located within a Borough Employment Area (BEA).
- 8.25 London Plan Policy 4.4 (Managing Industrial Land and Premises) seeks to manage industrial land, partly through the release of surplus industrial land so it can contribute to strategic and local planning objectives, especially those to provide more housing.
- 8.26 LBWF's Policy DM19 seeks to safeguard employment-generating uses within BEA's. It states that housing and social infrastructure may be permitted in the borough's key growth areas where they act as a facilitator to an improved and intensified employment offer on site.
- 8.27 LBWF's Policy CS8 concerns making efficient use of employment land. The policy states that the Council will facilitate economic growth in BEAs by intensifying and upgrading existing employment land to secure more jobs for local people.
- 8.28 It is acknowledged that this approach has borough-wide advantages by catering for population growth, whilst also protecting the borough's green assets. Supporting text acknowledges that the Council recognises the requirement of national planning policy which advocates a flexible approach to employment land provision.
- 8.29 The existing commercial space will be entirely re-provided to create 1,096 sqm of B1c light industrial space, suitable for location next to residential use. This will be located on the eastern side of the site at ground floor at ground and mezzanine level.

- 8.30 The upgraded industrial floorspace will vastly improve the commercial capabilities and will offer greater efficiency and flexibility for future occupiers. The floorspace will be intensified to offer a greater opportunity for employment than is currently offered on site. The healthcare waste facility currently employs 5 to 10 permanent workers whilst the proposed light industrial space will provide the opportunity for 20 or more permanent positions.
- 8.31 Overall, in line with LBWF safeguarding policies, there will be no loss of industrial floorspace or employment opportunity on site. The floorspace will be intensified to offer light industrial floorspace which will be of greater efficiency, viability and will vastly improve the employment opportunity on site.

Housing Policies

Density

- 8.32 The scheme is above the density levels for an urban location as identified in both the London Plan and the Draft London Plan, however, by virtue of the adopted and emerging policy designations for the area and the proposed transport improvements it is considered the higher density proposed is suitable on site.
- 8.33 London Plan Policy 3.4 and Policy D6 of the Draft London Plan seek to optimise housing density, with the Draft London Plan placing greater emphasis on a designed approach to density assessments, with consideration given to site context, public transport, walking and cycling accessibility and the capacity of surrounding infrastructure. Policy H1 (Increasing housing supply) and Policy H3 (Monitoring housing targets) also set out requirements for increasing housing supply across London and identify locations where increased housing capacity can be achieved.
- 8.34 Draft London Plan policy GG2 (Making the best use of land) emphasises the need to make the best use of land to cater for London's growing population. This should be achieved by creating places of higher density in appropriate locations to get more out of limited land, encouraging a mix of land uses, and co-locating different uses to provide communities with a wider range of services and amenities. The policy states that to make the most efficient use of land this will mean developing at densities above those of the surrounding area on most sites. The design of the development must optimise housing density.
- 8.35 Policy SD1 (Opportunity Areas), seeks to ensure that Opportunity Areas maximise the delivery of affordable housing and create mixed and inclusive communities. The policy recognises that designating large areas as opportunity areas can as result in them defining their own character and density.

- 8.36 Policy D6 (Optimising housing density) gives particular consideration to the site context; its connectivity and accessibility by walking and cycling, and existing and planned public transport (including PTAL); and the capacity of surrounding infrastructure. The policy goes on to state that proposed residential development that does not demonstrably optimise the housing density of the site in accordance with this policy should be refused.
- 8.37 The policy states that the density of development proposals should be based on, and linked to, the provision of future planned levels of infrastructure rather than existing levels and that boroughs should work with applicants and infrastructure providers to ensure that sufficient capacity will exist at the appropriate time. The surrounding area is set for change with 9 Osier Way set to be the first to come forward, with the other developments gradually coming forward in stages, helping the provision of necessary infrastructure and public transport services to be delivered accordingly.
- 8.38 It is acknowledged that there are already numerous public transport improvements which are in the preliminary stages of being planned. This is proposed to include the extension of bus route W19 into Leyton, via Orient Way and Oliver Road with the potential of travelling along Osier Way. This would connect the site directly to Whipps Cross University Hospital and also to transport interchanges of Ilford Station, Manor Park Station, to Leytonstone Underground Station, Walthamstow Central Station and Underground Station, Walthamstow Queens Road Station, St James Street Station and Leyton Underground Station.
- 8.39 It is also understood that there are early discussions taking place for a new railway station at Ruckholt Road approximately 200m to the south of the site, which would serve the existing line travelling between Stratford and The City and Hertfordshire. Four trains an hour now serve Lea Bridge Station, which is currently the closest station on this line circa 1km to the north of the site.
- 8.40 The extension to the existing bus route is expected to increase the PTAL of the area, with a further increase in PTAL coming from the new railway station.
- 8.41 The Council's adopted Core Strategy reaffirms the growth intention for the area by talking about the challenge and pressure for higher density and that this pressure is greatest in the Northern Olympic Fringe due to its proximity to the Olympic Park and Stratford City. The Core Strategy sets out the aim of the Northern Olympic Fringe to provide 2,500 new home and new jobs along with new social infrastructure, improved transport facilities, public realm and access to open space.

- 8.42 Higher density developments require greater attention to design (architectural style, landscaping, site coverage, open space, parking, etc.) with the Draft London Plan stating that the optimum density of a development should result from a design-led approach to determine the capacity of the site. Through the appointment of Waugh Thistleton Architects, who have formed an award winning partnership with Pocket, the scheme has been designed to the highest quality both in terms of the standard of accommodation and in the use of materials proposed and in architectural language and detailing.
- 8.43 The approach of optimising density and achieving the most appropriate development form has been based on an evaluation of the site's attributes and in understanding the surrounding context and capacity for growth. This evidence base has followed the process set out in Draft London Plan Policy D2 (Delivering good design) and Policy D1 (London's form and characteristics) in terms of delivering high quality design and placemaking. The process is also set out in Council Policies CS15 (well-designed buildings, places and spaces), DM1 (Sustainable Development and Mixed Use Development) and DM29 (Design Principles, Standards and Local Distinctiveness) which require buildings to respond positively to local context and character. The site has been through the Council's design review process to assess and inform design options early in the planning process.
- 8.44 Whilst the proposed density exceeds the upper limits of the London Plan density range, the range should not be applied mechanically. Design, residential quality, location to existing transport nodes and the planned transport capacity are important considerations in determining whether the proposed density is acceptable. In this case, where the high density does not manifest itself in any unacceptable impacts in terms of design, residential quality, neighbour amenity, strategic views or transport impacts, the proposed density is acceptable.
- 8.45 Overall, noting the characteristics of the location and emerging context and the improvements to transport infrastructure and to walking and cycling routes, the site is suitable to the provision to a well-designed high density mixed use development.

Affordable Housing

- 8.46 Policy DM3 sets the Council's aim to provide a minimum of 50% of new housing as affordable. The proposal will provide 100% affordable housing, significantly exceeding the Council's policy target and complying with the Council's aspirations to provide as many affordable homes as possible.
- 8.47 All of the proposed new homes would be intermediate affordable tenure, which must be considered against the requirement of policy DM3 which seeks tenure splits of 60% social/affordable rented units and 40% intermediate units.

- 8.48 Pocket housing is provided following a unique model that enables sites to deliver 100% affordable housing, without public subsidy, by providing all housing as intermediate housing. Inclusion of affordable housing of other tenures would compromise delivery of the model and dramatically reduce the ability of sites to bring forward the level of affordable housing provided.
- 8.49 Due to lease conditions and restrictions within the Section 106 Agreement, Pocket intermediate homes will remain affordable in perpetuity for future buyers. This distinguishes them from other forms of intermediate affordable housing, such as shared-equity, where over time owners can acquire remaining equity and finally sell the property on the open market. Once this occurs, an affordable unit is lost from the borough's supply. Pocket intermediate homes will always remain affordable, discounted in the future to values on the open market at that time. This will be secured within a S106 Agreement. The same eligibility criteria would also apply to any subsequent sales in that occupiers would have to live or work in the Borough, be a first time home owner and earn below the Mayor's income thresholds.
- 8.50 Recognising the Council's demand for affordable homes and the minimum policy requirement of 50% provision of affordable homes, the proposals are consistent with the Council's strategic policy objectives. These objectives seek to maximise affordable housing supply with policy 3.12 of the London Plan requiring that the maximum reasonable amount of affordable housing is sought when negotiating on private residential schemes.
- 8.51 It should be noted that the two and three bedroom units would also be affordable intermediate housing, which does not normally form part of the Pocket model, but the applicant is able to provide the larger units as affordable in perpetuity, which provides a good mix of affordable housing catering for a wider scope of people.
- 8.52 An affordable housing statement has been submitted in support of the application.

Mix of Dwellings

- 8.53 Policy DM5 provides that the Council will aim to secure a range of homes that will contribute to the creation of mixed, inclusive and sustainable communities by seeking all housing developments to provide a range of dwelling sizes and tenures particularly focusing on the provision of larger family sized homes (three bed plus) in line with the preferred housing mix.
- 8.54 However, the dwelling mix will be considered on a site by site basis taking account of the site size and other constraints, the surrounding context and character, the overall level of affordable housing proposed and the financial viability of the scheme.
- 8.55 The proposals do not comply with policy DM5 which is a dwelling mix policy that is common in intent to development plans across all the London boroughs. It is acknowledged that Pocket developments require an exception for these to be made to these policies.

- 8.56 We consider that an exception to adopted policy DM5 is warranted on the grounds that other material considerations – namely the provision of 210 new affordable high-quality dwellings, which include a mix of one, two and three bedroom units on a site that would otherwise deliver a lower number of dwellings, with a small contribution to affordable housing – outweigh the need to ensure that the site delivers a mix of dwellings of all sizes.
- 8.57 It must be recognised by officers that the reason Pocket homes are affordable is because Pocket provide a certain quantum of dwellings on a small site. The larger mix of one-bedroom dwellings is a key element in ensuring that Pocket developments are viable and affordable for the end user. The proposals are consistent with London Plan policies 3.3 (increasing housing supply) and 3.4 (optimising housing potential). Viability is also a consideration in this respect. Provision of more larger-sized homes within Pocket developments compromises the model by reducing the overall number of units affecting the viability of the scheme as a whole.
- 8.58 It must be recognised that the demographics of the population are changing; between 2006 and 2031 household growth is projected to increase from 21.5m to 27.8m of which 65% (i.e. 4.1m) will be one-person household growth (source: ONS). The vast majority of buyers of Pocket homes are singles and couples (without children) looking to get away from renting, with 91% of the purchasers to date being single persons.
- 8.59 Pocket targets buying small sites in highly accessible areas which are also the areas that single persons and couples are looking to locate to (sites within commutable distance to work). By designing smaller one-bed homes in these accessible urban locations Pocket is meeting this demand from singles and couples. Proof of the need for Pocket's one bed homes is demonstrated by the fact that over 13,000 people have registered their interest in buying a Pocket home.

Wheelchair Accessible Dwellings

- 8.60 It is recognised that policy 3.8 within the London Plan concerning housing choice provides that 10% of new housing should be designed as wheelchair accessible or easily adaptable for wheelchair users.
- 8.61 Within the proposed scheme this would equate to provision of 20.10 wheelchair units, however in the case of this particular development, this is not considered practical or proportionate to the evidenced level of demand. In LBWF, there are currently 1999 households registered with the Mayor of London's First Step Scheme with a maximum of 2 occupants whose earnings match the qualifying criteria for a Pocket flat. Of this number of applicants, only 17 have a wheelchair within their household. This represents less than 1% of the total.

- 8.62 Furthermore, the demand for wheelchair accessible units amongst buyers of traditional intermediate affordable housing is exceptionally low. This is consistent with the numbers in other boroughs where Pocket has previously obtained planning permission. Of all the Pocket registrants, there is only a demand from 0.3% for wheelchair accessible units.
- 8.63 These low figures are an unintended consequence of the uniform mix of units proposed, and the fact that eligibility to purchase is also further restricted by qualifying criteria (First time buyers, live or work in the borough, below income threshold). It is therefore apparent that to provide 10% of the total number of dwellings as wheelchair units would be unnecessary in this particular case.
- 8.64 Anecdotal evidence from housing departments within other boroughs where Pocket has a presence is that demand for one-bedroom intermediate-affordable wheelchair accessible homes is exceptionally low. Pocket have only sold one Pocket unit to a wheelchair registered person in the history of the company. Other boroughs where Pocket has a presence have accepted this reality and no longer require wheelchair provision from Pocket developments, or require a single unit which if no buyer is found can be sold to a non-disabled person.
- 8.65 For the reasons set out above the provision of 13 2-bedroom wheelchair adaptable units would be more proportionate to need. These are to be provided in the form of two bedroom apartments which will be designed to meet the Part Building Regulation requirement M4(3) 'Wheelchair user' dwellings designed to be easily adaptable for wheelchair occupiers. The adaptable units will be located from the upper ground level to the 12th level in Block E.
- 8.66 An access strategy prepared by Withernay Projects is also submitted as part of the application. The report itself provides details of the access strategy for entrance to and from the site, use of residential communal areas as well as the strategy for commercial units.

Internal Space Standards

- 8.67 Policy DM7 provides that new residential dwellings are expected to meet the Council's internal space standards as expressed within tables 8.1 and 8.2 (page 56 of the Development Management policies document). It is recognised within policy DM7 that the tables omit studio flats and 1 bed 1 person flats. It is stated that the Council does not support provision of these types of dwellings.
- 8.68 As noted within the Schedule of Areas within the architect's Design & Access Statement the majority of units within the scheme are 1 bedroom units of 38sqm and 39sqm. The two bedroom three person units exceed required standards at 67.5sqm, 68.3sqm and 75.9sqm as do the three bedroom four person apartments at 80.3sqm. The two bedroom wheelchair adaptable units measure 80.4sqm and 84.6sqm.

- 8.69 Whilst the Council's approach within policy DM7 is not consistent with policy 3.5 (and table 3.3) of the London Plan, which supports 1 bed 1 person dwellings of 37m² (GIA) such as those proposed, we require the Council to make an exception to policy DM7, in this case. We consider that the Council can make an allowance due to the fact that London Plan policy 3.5 states that, in reference to the minimum space standards (which LBWF have adopted from the London Plan): *'Development proposals which compromise the delivery of elements of this policy may be permitted if they are demonstrably of exemplary design and contribute to achievement of other objectives of this Plan'*.
- 8.70 As alluded to previously, the Pocket model, including the small nature of the dwellings is endorsed by the Mayor of London in full recognition of Policy 3.5 of the London Plan. It must also be recognised that approximately 91% of Pocket homes are sold to single people rather than being one-bed, two-person flats.
- 8.71 Pocket homes are designed extremely well, as demonstrated in the accompanying Design and Access Statement and the numerous awards they have won. Pocket homes are also designed on a standard layout which ensures consistency of quality and so that they can be built at a price that ensures they are affordable to purchasers.
- 8.72 Provision of a scheme of 100% affordable housing, without public subsidy is a significant material consideration in recognition of policies CS3 and DM3 which state that the Council will maximise the number of new affordable homes. The new Pocket homes will remain affordable in perpetuity. Due to the s106 agreement they are not available to buy-to-let owners or those who already own a residential property and they can never be sold on the open market.
- 8.73 This type of development is specific to the Applicant (Pocket) and distinguishes Pocket from other developers. For these reasons the Council can distinguish between Pocket and any other proposals for a development with a uniform mix of 1-bed dwellings that the Council may find unacceptable.

External Amenity Space

- 8.74 The proposed scheme provides areas of both communal and private external amenity space.
- 8.75 Private communal space will be provided in the form of landscaped roof terraces which will be located on the roofs of the blocks. The spaces would be accessible to all future residents and have been carefully designed as part of a high quality landscape masterplan prepared by BD Landscaping.
- 8.76 It is proposed the three separate roof terraces will have a different character in terms of their amenity use. This will include an active terrace, reflective and productive terrace and a social amenity terrace, each with specific landscaping features to create rich and diverse outdoor areas.

- 8.77 Future residents would also have access to communal interstitial areas which will exist on each residential floor. These areas would provide localised amenity offering private areas for 4-9 flats which could be used to provide relaxing seating areas. In addition, it is proposed to include 175 sqm of locker space for residents to utilise for any additional storage.
- 8.78 The two and three bedroom flats will also benefit from private balconies resulting in 34 units with access to private outdoor amenity space. The balconies will all be of generous size of 9.7 sqm which exceeds the minimum standards set out by the London Plan Housing SPG and the minimum size required by Policy DM.7. The balconies will all be on corners to create a good level of privacy.
- 8.79 The scheme provides 1,357 sqm of communal amenity space and in total with the inclusion of private amenity space will provide 1,687 sqm. It is acknowledged that this provision is below LBWF requirement of 2,490 sqm. However, the communal areas are designed to be of a high quality and will be functional and adaptable to a range of recreational activities as well as designed to facilitate social interaction and community living.
- 8.80 Overall, the scheme will be providing a total of 8 sqm of amenity per unit, and therefore also exceeds the London Plan amenity space requirements.

Play space Provision

- 8.81 The GLA's Supplementary Planning Guidance (SPG) 'Shaping Neighbourhoods: Children and Young People's Play and Informal Recreation' (2012) recommends that 10 sq m of play and recreation space is provided for children and young people in new developments.
- 8.82 The child yield is calculated to be 6 and therefore in accordance with the London Plan, the required play space is 60sqm.
- 8.83 The scheme will provide 60 sqm of playspace and is therefore policy compliant with London Plan standards. The play space will be located in a dedicated space within the north-eastern roof terrace.

Outlook & Visual Privacy of Future Occupiers

- 8.84 The majority of one bedroom units are single aspect, however will be provided with generous sized windows to both living space and bedrooms. The single aspect nature of the units is conventional of the Pocket model which has been developed over many years to ensure the units feel generous and efficient and still receive high levels of daylight and sunlight.
- 8.85 The two and three bedroom units will be located on corners and will therefore benefit from being dual aspect.

- 8.86 By virtue of the scheme design and taking into account the site surroundings, each of the proposed dwellings will have an appropriate level of outlook and visual amenity.
- 8.87 The proposed dwellings will also create increased natural surveillance to Auckland Road, Osier Way and also the internal courtyard area on site.
- 8.88 Potential overlooking to neighbouring residential properties and gardens is also mitigated by design and surrounding conditions. It is considered that the scheme would not introduce any harmful levels of overlooking to surrounding existing properties.
- 8.89 In terms of emerging developments, the scheme has been design to consider the Bywaters outline permission which proposes terraced properties and rear gardens along the boundary closest to the site. The built form has been designed to be positioned away from this boundary which will instead be closest to the one storey cycle store. This will ensure there is no direct overlooking or overbearing impact.
- 8.90 It is also considered that there will be sufficient distance from facing windows of the Score Centre redevelopment, which will mitigate any harmful impact upon privacy.

Daylight, Sunlight & Overshadowing

- 8.91 LBWF Policy DM32 (Managing Impact of Development on Occupiers and Neighbours) sets out that in order to achieve a high standard of design, proposals should take into account the protection of existing residential amenities, including daylight and sunlight.
- 8.92 Policy 3.5 of the London Plan expects housing developments to be of the highest quality, internally and externally. Guidance on the application of Policy 3.5 is provided by the Mayor's Housing SPG (2016). The SPG echoes Policy 3.4 of the London Plan, which seeks to optimise housing output, and recognises that in achieving optimum housing delivery that "an appropriate degree of flexibility needs to be applied when using BRE guidelines to assess the daylight and sunlight ... within new developments. Guidelines should be applied sensitively to higher density development, especially in opportunity areas, town centres, large sites and accessible locations, where BRE advice suggests considering the use of alternative targets. This should take into account local circumstances; the need to optimise housing capacity; and scope for the character and form of an area to change over time."
- 8.93 The Housing SPG at paragraph 1.3.46 goes on to state that "The daylight targets within a proposed scheme should be assessed drawing on broadly comparable residential typologies within the area and of a similar nature across London. Decision makers should recognise that fully optimising housing potential on large sites may necessitate standards which depart from those presently experienced but which still achieve satisfactory levels of residential amenity."

- 8.94 Paragraph 2.3.47 of the Housing SPG states “BRE guidelines on assessing daylight and sunlight should be applied sensitively to higher density development in London, particularly in central and urban settings, recognising the London Plan’s strategic approach to optimise housing output (Policy 3.4) and the need to accommodate additional housing supply in locations with good accessibility suitable for higher density development (Policy 3.3). Quantitative standards on daylight and sunlight should not be applied rigidly, without carefully considering the location and context and standards experienced in broadly comparable housing typologies in London.”
- 8.95 Daylight, Sunlight and Overshadowing assessments have been carried out by Right of Light Consulting Ltd to analyse the impact on existing and future neighbouring residential properties within the surrounding area.
- 8.96 A three-dimensional model (based on guidance published by the Building Research Establishment (BRE)) was used to assess the likely daylight, sunlight and overshadowing impacts of the development. The assessments ascertain whether the proposed mixed-use development will provide residential accommodation considered acceptable in terms of daylight, sunlight and overshadowing.
- 8.97 The assessment focused on the impacts to the light receivable by the neighbouring properties at 1 to 8 Palm Close, as well as 24,26 and 28 Osier Way. The assessment also focused on the impact of light attainable by the surrounding emerging developments at the Bywaters and Score Centre sites.
- 8.98 In terms of daylight, it was found that all main habitable room windows tested passed the Vertical Sky Component test. As such the proposed development satisfies the BRE daylight to windows requirement and does not have adverse impact to neighbouring properties in terms of daylight obstruction. This was the case for the windows of existing neighbouring properties and the estimated façade locations of the Bywaters and Score Centre site.
- 8.99 The assessment also tested sunlight to windows by testing all windows within 90 degrees of due south. It was found that all habitable room windows of existing properties would pass annual and winter sunlight hours test. It was also confirmed using estimated reference points that the Bywaters and Score Centre sites would surpass the BRE direct sunlight hours’ targets.

- 8.100 Overshadowing to the neighbouring gardens was also assessed. It was found that the overshadowing would cause low impact to the gardens of 2 to 6 Palm Close. The sunlight availability was still assessed as being better than the BRE minimum requirement. The sunlight reduction for the garden at 1 Palm Close was assessed as being slightly less than the BRE target. However, with consideration for this being an isolated shortfall and also being a minimal reduction that this is considered acceptable. Furthermore, the minor reduction should be considered acceptable given the location of the site within an opportunity area, where high densities are required to meet housing targets, and where rigid application of BRE guidelines would be inappropriate.
- 8.101 Right of Light Consulting have also undertaken an assessment of predicted daylight and sunlight levels to be experienced by future occupiers.
- 8.102 It was confirmed that in the case of the units at Osier Way, the majority of living rooms considered had at least one south facing window. Overall, the study confirmed that the proposed design of units means that all of the requirements set out in the BRE guide 'Site Layout Planning for Daylight and Sunlight' are satisfied.
- 8.103 It is therefore the case that proposals do not have an adverse impact upon the amenity of neighbouring occupiers in relation to daylight and sunlight, therefore the proposals accord with policy DM32. Furthermore, all of the proposed dwellings within the scheme will achieve an appropriate amount of internal daylight and sunlight for the future occupants.

Design

- 8.104 The proposed building is broken up into individual blocks which are defined by small recesses. This breaks up the massing by reducing the scale of the building and allows for subtle variations in architectural language across the site. The building is carefully arranged around the perimeter of the site to create an internal courtyard area. The height and scale of the blocks vary across the site as each block has been carefully informed by the neighbouring existing and emerging context.
- 8.105 The building will include a one storey element which will be used to provide indoor cycle parking along the western side of the site. This opens up the courtyard to the west and allows for greater light levels to enter the courtyard and units which are westerly facing. This arrangement also acknowledges the relationship with the consented Bywaters site that has residential gardens backing on to the Pocket site.

- 8.106 The north-western corner offers the opportunity for the taller 10 storey building to act as a 'marker' when approaching the site along Osier Way. The north eastern corner is limited to 6 storeys which is designed to respond sympathetically to the low rise housing to the north of the site. The building height increases along the north eastern elevation which is designed to mirror and engage with the stepped design of the permitted outline application of the Bywaters site. The south eastern corner will be 13 storey's in height which was designed to respond to the 15 storey buildings permitted at the Bywaters site.
- 8.107 The overall architectural design was supported by the GLA who welcomed the approach of complementing the outline permission of the Bywaters buildings. The GLA also stated that the outline nature of the Bywaters masterplan is likely to increase by height and massing and as such encourage further optimisation of the proposals. Furthermore the score centre site masterplan is currently being development which we understand is looking at similar densities.
- 8.108 The Bywaters Masterplan designates the strip of land to the north east between the Score and The Site proposals as new public route which will reinstate the use of Auckland Road. In view of this the proposals seek to establish a new street frontage along Osier Way and Auckland Road which will vastly improve the area and will contribute to the wider network of public realm. The ground floor uses will be differentiated to include the entrances to the residential lobbies and the active ground floor commercial floor space which will bring life into an area which is currently unwelcoming.
- 8.109 The building has been designed to be slightly set back from Osier Way. This allows new public space to be created to allow the continuation of Osier Way to the west to provide a new route for pedestrian, cycle and future public transport. This also seeks to open up views to the allotments to the north west of the site.
- 8.110 The overall design will be of a high quality with the main material being brick allowing the proposal to respond to the surrounding context of the area. It is the aim that each block is observed as distinct and this is expressed in the variations in height and scale and the subtle differences in materials and design.
- 8.111 The accompanying Design and Access Statement by Waugh Thistleton Architects provides greater detail on the evolution of the proposals and the design rationale behind the proposed scheme.

Landscaping

- 8.112 The landscape strategy is integral to the overall design of the proposed development. The landscape proposals have been developed by BD Landscaping. The specific details of the proposals are included within the Landscape Design Statement which is submitted in support of this application.

8.113 The Statement provides details of the proposed form, materials and envisaged uses of the external spaces on the roof terraces, interstitial areas and the new external public spaces surrounding the new buildings.

8.114 At present, the site is entirely formed by hardstanding with minimal ecological interest. The proposals will transform the site by incorporating new green landscaped areas which will encourage diversity in and around the site. The landscaping features will be used in external amenity areas to create attractive and relaxing areas within the courtyard and the roof terraces whilst also creating visual interest for views looking towards the site.

Ancillary Residential Floorspace

8.115 The proposals include two overnight guestrooms that offer a facility for family and friends who are visiting residents to stay overnight. The rooms will be situated at upper ground floor level in the southern block.

8.116 The rooms will be booked through a central booking system which will be managed by Pocket Living or the Management Agent of the development. The rooms will be restricted to family and friends of residents only and will only be available for short booking periods.

Economic Statement and Local Labour and Employment assessment

8.117 The site lies within a Borough Employment Area. Policy DM19 requires that the provision of employment should be increased through the intensification of employment uses on site. The proposal would increase the overall employment floorspace on the site while making more efficient use of the site in line with the policy designations for the area. The new employment floorspace will overall increase the number of jobs on site to over 20 permanent jobs in comparison to the 5-10, jobs which are currently accommodated on site.

- 8.118 The new employment floorspace is designed to be flexible to cater for different B1c businesses that would have access to both a ground floor and / or mezzanine area. The space would be serviced from the courtyard to the rear of the units, which provides a convenient and accessible space for loading and deliveries. The existing employment floorspace is a health care waste facility, which is no longer required and is to be closed. The proposed employment floorspace would provide uses within the B1c use class that would complement the residential surrounding while ensuring an increase in industrial capacity. Proposed uses would include businesses like makers' workshops, repair centres or print works. As part of the pre-application consultation exercise Pocket met with the East End Trade Guide to understand the needs of the sector and to talk to the type of local businesses Pocket consider would be suitable occupants of the proposed employment space. The employment floorspace has been designed following this consultation exercise and with the requirements of the businesses in mind to ensure the most attractive type of employment space is provided that would appeal to local businesses.
- 8.119 Policy CS10 seeks to ensure that employment opportunities are maximised for the local population. Through the construction phase the proposals will seek to maximise the use of local contractors which will provide a vast number of local job opportunities. The use of local labour during construction will be secured through the S106 agreement. The applicant will work with the Council to meet their objectives for local employment opportunities for both pre and post construction.
- 8.120 The development will also offer apprentice posts and work placements in the construction trade, with such posts being offered first to Local residents. Through the construction phase, reasonable endeavours will also be made to secure local suppliers, and this will be secured formally through the S106.

Technical Assessment

Transport Impact

- 8.121 Policy CS7 (Developing Sustainable Transport) seeks to ensure that development proposals fully assess the impact on transport capacity and should not adversely affect the transport network.
- 8.122 A Transport Assessment (TA) prepared by TPP accompanies this planning application. A Travel Plan prepared by TPP is also submitted with the planning application, which sets out measures to encourage the use of sustainable transport.

- 8.123 The Transport Assessment provides a full review of the impact of the proposals on the local and highway and public transport networks. The site is identified as being located in an area with a PTAL rating of 2, indicating a low level of public transport accessibility. However, as considered previously within the Density section and as described within the Car Parking Section below, the local area is expected to undergo significant change which will involve planned improvements to public transport infrastructure.
- 8.124 The Transport Assessment further details that the site is within less than 15-minute walking distance to numerous services including a doctor's surgery, retail and convenience stores and Primary and Secondary Schools. The location, together with the low level proposed parking means that nearly all the trips to and from the site will be by sustainable modes of travel. As a result, nearly all of the trips to and from the site will be by sustainable modes of travel.
- 8.125 The TA also concludes that the uplift in public transport usage will be comfortably accommodated within the current transport services. The resulting net increase in vehicle trips is also considered to be insignificant and would not have undue impact on the existing highway network.

Car Parking

- 8.126 In terms of sustainable transport, LBWF Policy DM13 (Co-ordinating Land use and Transport) seeks to ensure that new development proposals implement measures that promote sustainable travel, contribute to reducing car use and become properly integrated with the existing transport network.
- 8.127 LBWF Policy DM14 (Sustainable Transport Network) actively encourages sustainable travel modes and requires this to be supported through new developments to contribute to a well-connected and legible environment suitable for pedestrians and cyclists.
- 8.128 Aside from 4 disabled parking bays, the scheme is entirely car-free. It is acknowledged that given the vastly changing context, the local area will benefit from improvements to public transport which will transform the public accessibility of the site. This is proposed to include the extension of bus route W19 into Leyton, via Orient Way and Oliver Road with the potential of travelling along Osier Way. This would connect the site to Leytonstone Underground Station, Walthamstow Central Station and Underground Station and Leyton Underground Station.
- 8.129 There are also preliminary proposals to create a new railway station at Ruckholt Road, approximately 200m to the south of the site, which would serve the existing travels between Stratford, The City and Hertfordshire.

- 8.130 Core Strategy Policy CS7 and DM16 also set out that the Council will encourage car-free developments and will promote sustainable travel by guiding development to accessible locations, including town centres, to reduce the need to travel by car and to encourage walking and cycling and the use of public transport.
- 8.131 With consideration for the above, the principle of car free development is considered to be appropriate and was stated to be acceptable by LBWF and the GLA within their pre-app responses.
- 8.132 The car-free approach will promote the use of active modes of travel by future residents, typically young professionals and first time buyers who generally do not own or need to own a car for everyday activity.

Disabled parking

- 8.133 LBWF sets out the requirement for one off-street space per wheelchair unit. The scheme proposes to provide 4 car parking spaces only allocated to Blue Badge holders. The design will meet those set out within the London Plan.
- 8.134 As previously discussed, the demand for wheelchair units within intermediate affordable housing tenure is considered to be low and has been proven to be the case within the history of other Pocket schemes. For this reason, there will be no need for additional disabled car parking spaces to be provided as this would likely result in being a vacant and inefficient use of space.
- 8.135 Additional disabled parking would encroach into courtyard space which is currently required to ensure emergency vehicles can enter the site, turn around and leave through the courtyard.

Cycle parking

- 8.136 The cycle parking standards outlined in Table 6.3 of the London Plan recommend a minimum of 1 space per one bedroom flat or studio, and 2 spaces for all other dwellings.
- 8.137 The proposed development provides 244 secure, weather proof and accessible long-stay residential cycle parking spaces within a designated cycle storage building. The cycle parking provision meets the London Plan standards by providing a total of 239 long stay spaces, and 5 short stay spaces dedicated for residential visitors.
- 8.138 The long-stay residential cycle parking will be provided within two cycle stores accessed from the courtyard. This includes a cycle store to the west of the site which will primarily be accessed via a separate secure side from the western side of the front elevation of Osier Way.

- 8.139 In terms of the commercial floorspace, the proposal also seeks to provide 5 long stay cycle parking spaces for employees and 1 short stay space for visitors. These are proposed to be located within the courtyard and therefore will be secure by virtue that it is off the street and will benefit from natural surveillance.

Servicing and Waste

- 8.140 Policy DM32 requires that refuse storage should be stored in areas which benefit from safe and convenient access for occupants. The location should provide satisfactory access for refuse collection vehicles.
- 8.141 A ground floor refuse store is located towards the front of the site which will serve the two southern residential cores. Two further refuse stores to the north will serve the northern residential cores. Following the refuse strategy agreed by LBWF, the scheme will provide 12 Eurobins for general waste, 12 Eurobins for recyclable waste and 7 240 litre bins for food waste.
- 8.142 As advised, 6 Eurobins bins will be provided for the commercial use. The bins will also be located within the southern store but will be situated within a separate enclosure.
- 8.143 On collection day refuse from the stores will be gathered by the management team and placed at a collection point to the north west of the site. This will allow safe and efficient collection by refuse vehicles without the requirement to enter the courtyard.
- 8.144 Further details of servicing and waste management are provided in the Delivery and Servicing Management Plan prepared by TPP.

Construction Management

- 8.145 LBWF Policy DM13 (Co-ordinating Land Use and Transport) requires proposals to submit a Construction Logistics Plan in order to mitigate the impact of any noise, additional traffic or potential disruption to the network.
- 8.146 A Construction Management Plan produced by Pocket Living is submitted with this planning application and outlines the proposed measures that will be implemented during construction to ensure there are limited construction impacts on the local highway network and the neighbouring occupiers.
- 8.147 The CMP will act a 'live' document to be updated as the project is updated by additional information such as sub-contractor method statements and risk assessments.

Tall Buildings

- 8.148 The proposed height of the building will be assessed against Policies DM31 and DM32 from Waltham Forest's Development Management Policies DPD (2013).

- 8.149 Policy DM31 from the Development Management Policies Local Plan (2013) advises that proposals for tall buildings (ten storeys or more) will be subject to compliance Policy CS15 Paragraph C of the Core Strategy (2012). Paragraph C specifies that tall buildings may only be appropriate on specific sites within the key growth areas. The site is situated within the North Olympic Fringe which is one of these key growth areas. Therefore, the principle of a tall building in this area is policy compliant.
- 8.150 Policy DM31 also sets a list of the factors that the Council will consider when assessing proposals for tall buildings. The justification against these criteria is summarised in the following paragraphs.
- 8.151 The quality of design and architecture:
The proposal is supported by a Design and Access Statement which sets out the design in more detail. The design has been carefully considered and is influenced by the surrounding context, including the consented plans for the Bywaters site. The partnership with Waugh Thistleton Architects shows Pocket's intent to provide a well designed high quality building. Pocket's association with award winning architects is testament to they seek to achieve with all of their developments around London providing a high quality finish.
- 8.152 The quality of construction and materials:
The proposals have been carefully designed and will be constructed using the highest quality materials. Brick would be the prominent material ensuring the building responds positively to the surrounding context. The building is divided into separate blocks through the use of recesses and set backs in the building elevations as well as the differences in heights. This allows for subtle variations in the architectural language around the development with the different blocks either having a vertical or horizontal emphasis that includes different details around the fenestrations, for the banding around the building and in the type and colour of brick proposed.
- 8.153 Detail and impact at ground floor level:
The ground floor has been carefully considered to re-provide high quality and flexible employment space that will increase the employment capacity of the site and provide genuine B1C floorspace within the Borough Employment Area. This would also provide interaction with the street and ensure the scheme is truly mixed use providing employment opportunities as well as high quality housing for local people.
- 8.154 The scheme has been designed to ensure the ground floor that faces the public realm would interact positively with both Osier Way and Auckland Road, while the rear of the ground floor level facing the internal courtyard would accommodate the servicing areas. This will include servicing and delivery for the industrial space, along with parking for the wheelchair adaptable units and the refuse and bike stores that are easily assessable to future residents.

- 8.155 A high quality public realm would also be provided in front of the ground floor that contributes to the opening up of Osier Way and Auckland road as through routes to the public, particularly for pedestrians and cyclists, as well as clear and well designated spaces for different uses that could include public open space, a bus route, drop off points and refuse collection area and cycle route.
- 8.156 Impact on privacy and amenity with adjacent properties:
The immediate neighbours of the proposal comprise the residents of the existing low rise dwellings to the north and the future residents of the permitted Bywaters scheme to the south and west. There will be a significant distance between the scheme and the surrounding buildings to minimise the impacts on daylight/sunlight, outlook and privacy. The scheme has been purposely designed so that it steps down in the north of the site with the highest part of the scheme in the south-east corner of the site. The transition in height downwards from the south to the north of the site ensures that amenity and privacy of the low rise development to the north is protected.
- 8.157 An overshadowing assessment has been carried out as part of the submitted daylight and sunlight assessment, which shows the impact on the existing residents and on the consented Bywaters sites and emerging proposals for the score centre site are acceptable. The single storey element along the west of the site minimises the impact on the consented residential properties and gardens of the Bywaters Site, particularly in terms of daylight/sunlight, outlook and privacy.
- 8.158 Accessibility to transport interchanges and nearby facilities such as shops, community facilities and other services etc:
The site is within close proximity of Leyton, which provides a range of shops and services. Leyton Tube Station is within walking distance of the site and provides Central line services into central London. There are also a number of bus stops along the A112 with frequent services to the local area. Leyton Midland Road Overground and Lea Bridge Train Station are also within walking distance of the site.
- 8.159 PTAL levels are set to increase as a result of proposals to improve to bus routes and train services, which include extending bus route W19 pass the site and potentially a new train station at Ruckholt Road. Planning policy states that densities should be considered having regard to both existing and emerging public transport levels.
- 8.160 Impact on local and strategic views:
The Design and Access Statement provides views of the development from important locations around the area which shows the proposal would not be highly visible in mid to long views and only becomes visible when travelling along Osier Way. As well as the existing and emerging context the block heights have also been dictated by these views with the lowest block located on the corner of Osier Way and Auckland Road and the development stepping back along Osier Way and Auckland Road from this point ensuring a gradual increase in height when observed from local views.

8.161 Impact on micro climate for example wind, sun and reflection:

Technical assessments have been carried out by qualified consultants to assess the micro climate. It has been concluded that the environment around and within the site would be acceptable, which includes the public realm, internal courtyard and communal and private amenity areas. The daylight and sunlight assessment also shows all units and parts of the building receive good levels of daylight and sunlight in accordance with BRE guidelines.

8.162 Impact on the historic context:

The site is not located within a Conservation Area and there are no listed buildings on or near to the site. Therefore, there will be no negative impacts on the historic context. The proposal responds positively to the surrounding context through the design and choice of materials (predominantly brick). The location of height around the development is considered to have an acceptable impact on local and strategic views. The impact on the public realm would also be improved, providing active frontages along Osier Way and Auckland Road and providing an improved environment for pedestrians and cyclist and opening up Osier Way and Auckland Road as through routes again.

8.163 Relationship to topography and surrounding land form:

The proposals are based on the emerging surrounding land form. This permitted scheme on the Bywater site rises to 15 storeys and will accommodate 730 new homes. The nearly completed Nest E10 development on Dunedin Road to the south rises to 16 storeys and accommodates 84 new homes. This sets a precedent for high rise and high density residential development in the surrounding area. The proposals will respect this emerging built form by proposing 210 units across a scheme which rises to 13 storeys. This height will be the same as the proposed 13 storey adjacent building on the Bywaters site. The lowest part of the scheme will be 6 storeys and will be located on the northern corner which is adjacent to the low rise dwellings. These variations in height allow the scheme to respond to the surrounding context.

8.164 The management regime, particularly in relation to residential mix:

The proposals will provide 210 residential units, 40sqm of A1 café space and 1,096 sqm of industrial space (Class B1(c)) at ground floor level. The residential units will be a range of dwelling sizes, including 176 one bed units, 16 two bed units, 13 two bed accessible units, and 5 three bed units. This includes a density of 477 units per hectare.

8.165 As with all Pocket Schemes, there would be a management team who would man the reception desk and organise the bins on collection day, etc. All entrances for both pedestrian and vehicles would be fob activated ensuring a secure building for both residents and tenants of the employment units.

- 8.166 As described above, the proposals are demonstrated to accord with the criteria of Policy DM31. This policy also states that developers will be expected to take into account relevant guidance on design/heritage matters as published by CABE/English Heritage particularly in relation to the impact of such buildings on their surroundings and local historic context.

Managing Impact of Development on Occupiers and Neighbours

- 8.167 Policy DM32 relates to managing impact of development on occupiers and neighbours. It sets a list of criteria that new developments should achieve. The justification against these criteria in Policy DM32 is summarised in the following paragraphs.
- 8.168 Ensure that daylight/sunlight, outlook and privacy is maintained for existing occupants and their neighbours in their homes and gardens as well as for the intended occupants of new habitable rooms:
As discussed in paragraph 8.116, the design of the scheme has been carefully considered to prevent any negative impacts on the amenity of neighbouring occupiers. Heights and massing have been dictated to respond to the existing and emerging context and ensure there would be no significant detrimental impact on the amenity of neighbouring properties.
- 8.169 The future occupants of the proposed development will each benefit from a good standard of residential amenity. All two bed, two bed accessible and three bed units will be dual aspect to ensure good levels of daylight and sunlight. The flats have been carefully positioned to ensure a good level of privacy. There is a variety of shared amenity spaces across the different floors and the larger flats will benefit from good sized private balconies.
- 8.170 Ensure the provision of facilities for the storage, collection and disposal of refuse:
The policy states that in assessing such provision for refuse, the Council will have regard to the level and type of provision, the location, the impact on visual amenity, the impact on the health and amenity of the occupiers and security. The refuse capacity has been provided in accordance with conversations with the Council's Environmental and waste management team, where as a consequence of the number of one-bed Pocket units the Council agreed to the use of British Standards for these units. The two and the three bed units comply with Waltham Forest standards.
- 8.171 Discreet and secure bin stores will be located within the buildings to prevent negative visual impacts and will be accessed from the internal courtyard. Refuse will be collected from the stores on collection day by the management team and positioned at the north east of the site. A designated zone for refuse trucks will be located here.

8.172 As described above, the proposals are demonstrated to accord with the criteria set by Policy DM31 and DM32. The design, scale and massing of the proposals will complement the surrounding emerging land uses and context. The location is sustainable for high density residential development and is within a key growth area, which is suitable for tall buildings. The tall buildings will provide 210 residential units on an underutilised brownfield site, as well as high quality replacement employment floorspace, complying with the objectives of the National Planning Policy Framework and the London Plan. The scheme will make a significant contribution towards meeting Waltham Forest's housing targets and will provide 100% affordable housing scheme.

Wind and Microclimate

8.173 LBWF Policy DM31 sets out that proposals for tall buildings must demonstrate that the development would not have a detrimental impact on the local environment.

8.174 A Wind Microclimate Study has been carried out by FD Global LTD which assesses the safety and comfort of various points within and surrounding the proposed development. The assessment concludes that the proposed development will not adversely impact the pedestrian level wind microclimate around neighbouring buildings. The pedestrian level wind microclimate is also likely to remain safe for all users of the site.

Energy and Sustainability

8.175 An Energy Statement and a Sustainability Statement has been carried out by TUV SUD and is submitted as part of the planning application. In accordance with the Council's policies DM10 and DM11 and those within the London Plan, the proposal incorporates energy strategy for the proposed development has been formulated following the London Plan Energy Hierarchy: Be Lean, Be Clean and Be Green.

8.176 It is proposed that a community heating network will serve the development, supplied by a future district heating network.

8.177 A BREEAM assessment is provided within the report and summarises how the proposals will achieve the 'Very Good' rating for the proposed light industrial space.

8.178 The scheme would, through the provision of highly efficient building fabric, building services systems and adoption of feasible renewable technologies, achieve an overall 36% reduction (SAP2012) and 24% (SAO10 carbon factors) in the predicted development's 'regulated carbon dioxide emissions. The scheme would be able to meet a 'zero carbon' standard through a carbon offset payment scheme.

8.179 Overall, the proposed development would successfully meet the best practice standards referred to in the Mayor's Sustainable Design and Construction SPG, and the priorities found in the Local Plan.

Overheating

- 8.180 In line with the energy saving strategies, the proposed development has also been assessed in accordance with the cooling hierarchy within the London Plan, which seeks to reduce overheating and minimise use of active cooling.
- 8.181 London Plan policy 5.9 requires that proposals reduce potential overheating and reliance on air conditioning by following the cooling hierarchy, which outlines numerous design and ventilation requirements.
- 8.182 Local Plan Core Strategy Policy CS4 also requires building design to be sustainability focused to avoid flood risk, water stress and overheating.
- 8.1 The application is supported by a Dynamic Overheating Assessment Report prepared by TUV SUD. The assessment includes dynamic thermal modelling to give an indication of how the building will perform against the calculations methodology for overheating in dwellings.
- 8.2 The proposed development incorporates numerous design features to reduce the level of overheating risk. The report confirms that the majority of areas pass the specific criteria and that the implementation of design features will be effective.

Flooding

- 8.3 A site specific flood risk assessment has been prepared by Robert Bird Group. The site is located within Flood Zone 1 (lowest risk of flooding). The report highlights that the site is located in an area which is considered to be at low risk of flooding from surface water and artificial sources.
- 8.4 The site is found to be in an area, which has a moderate risk of groundwater flooding due to a shallow ground water table. In view of this, the assessment in conjunction with the accompanying Drainage Statement outlines drainage mitigation measures, which will be implemented throughout the development to ensure flood risk is managed in accordance with LBWF Policy DM34.

Drainage

- 8.5 A Drainage Statement prepared by Robert Bird Group accompanies the application. It is proposed that SuDS measures including green roofs, permeable paving and below ground attenuation tanks will be used to limit surface water run-off.
- 8.6 As part of the assessment, Thames Water has been consulted and it has been confirmed that the existing public sewers and drainage system have capacity to receive both surface and foul water flows from the site.
- 8.7 The proposals are therefore in accordance with LBWF policy which requires development proposals to demonstrate that, where they would generate additional demand, sufficient capacity already exists or that extra capacity will be provided to ensure that proposals would not overload Thames Water infrastructure.

Trees

- 8.8 Policy DM35 (Biodiversity and Geodiversity) requires that the loss or damage to trees should be avoided and mitigated where possible. The majority of the site is hard landscaped and only contains trees around the perimeter of the site; none of which are protected by a Tree Preservation Order (TPO).
- 8.9 An Arboricultural Assessment prepared by RPS has been conducted to investigate and mitigate any adverse impact to the neighbouring trees. The report finds that no trees will need to be removed and provides a tree protection plan which outlines all measures will be implemented to ensure the construction and overall development does not harm the existing trees.
- 8.10 The proposed development integrates the existing trees and other landscape features into the design so that the existing trees can continue to make a positive contribution to the street scene and upon the deliverability of the overall development. The proposals are therefore in accordance with Policy DM35.

Ecology

- 8.11 LBWF policy DM35 (biodiversity and geodiversity) requires that existing sources of biodiversity should be retained and must be protected during development. It is also required that where opportunities arise, development proposals must provide measures to support species and habitats through the use of landscaping features.
- 8.12 RPS also carried out a preliminary ecological appraisal which concluded that the site would not have adverse impacts on local biodiversity as the site is of little importance for species of conservation interest.
- 8.13 The report states that the warehouse building on site does present characteristics, which could be attractive for roosting bats. In order to determine if bats could be present, RPS also completed a bat roost assessment of the buildings on site.
- 8.14 The assessment found no evidence of bats and the building structures on site were concluded to have negligible to low bat roost potential.
- 8.15 The proposal also seeks to introduce a new landscaping strategy which will provide opportunities for ecological enhancement, creating spaces for species to nest, roost or hibernate.

Archaeology

- 8.16 Policy DM28 (Archaeological Heritage) seeks to ensure that archaeological heritage is preserved and protected and where possible enhanced.

- 8.17 The site is located within the River Lea and Tributaries Archaeological Priority Zone. As such an Archaeological assessment was conducted by CgMs to investigate the below ground potential of the site. It was concluded that the site had only a low archaeological potential for all time periods.
- 8.18 There are no remains of national significance anticipated at site. For these reasons, it is suggested that should archaeological mitigation measures be required, these should be secured via condition.

Air Quality

- 8.19 Policy DM24 (Environmental Protection) states that new developments should not contribute to, nor suffer from unacceptable levels of air pollution.
- 8.20 The site is located in an Air Quality Management Area (AQMA), for nitrogen dioxide, (NO₂) and particulate matter (PM₁₀). An Air Quality Assessment has been carried out by Air Quality Limited and is submitted as part of the planning application.
- 8.21 The Air Quality Assessment confirms that with proposed mitigation measures, the overall air quality impacts from the development will be insignificant. Furthermore, the proposed development has been shown to be air quality neutral with regard to buildings and transport.
- 8.22 Therefore, the proposals would be in accordance with LBWF policy DM24 and London Plan policy 7.14 (Improving air quality).

Noise

- 8.23 Policy DM24 (Environmental Protection) requires that all major developments should aim to minimise the adverse impacts of noise through design and management. Mitigation should be implemented for noise sensitive uses such as residential.
- 8.24 A noise and vibration assessment has been undertaken by KP Acoustics Ltd in order to measure prevailing background noise and vibration levels and to outline necessary mitigation measures to ensure the future occupants would not be exposed to harmful noise levels.
- 8.25 The assessment investigates the expected level of daytime and night-time noise levels likely to be experienced by the proposed development. The report states that the proposed development is suitable for residential occupation.
- 8.26 The noise generated from potential vehicle servicing activity for the commercial use is considered to be manageable and acceptable with consideration for the context and infrequent vehicle activity.
- 8.27 The proposals will therefore comply with Policy DM24.

Ground Conditions and Contamination

- 8.28 Policy DM24 states that when development is proposed on or near a site that is known to be, or there is good reason to believe may be contaminated or where a sensitive use is proposed, the applicant should carry out a site assessment and submit a report of the findings in order to establish the nature and extent of the contamination.
- 8.29 An initial desk study report and ground investigation works were undertaken by Geo-Environmental. The investigation identifies moderate risks for both construction works and future site users. As a result, it is recommended that a site investigation is completed. Mitigation measures, informed by site investigations would be defined in a future Remediation Strategy and contractor's method statements to ensure appropriate design and construction during the development. As is usual for an application site of this nature, it is anticipated that any further site investigation and remediation will be secured by planning condition.

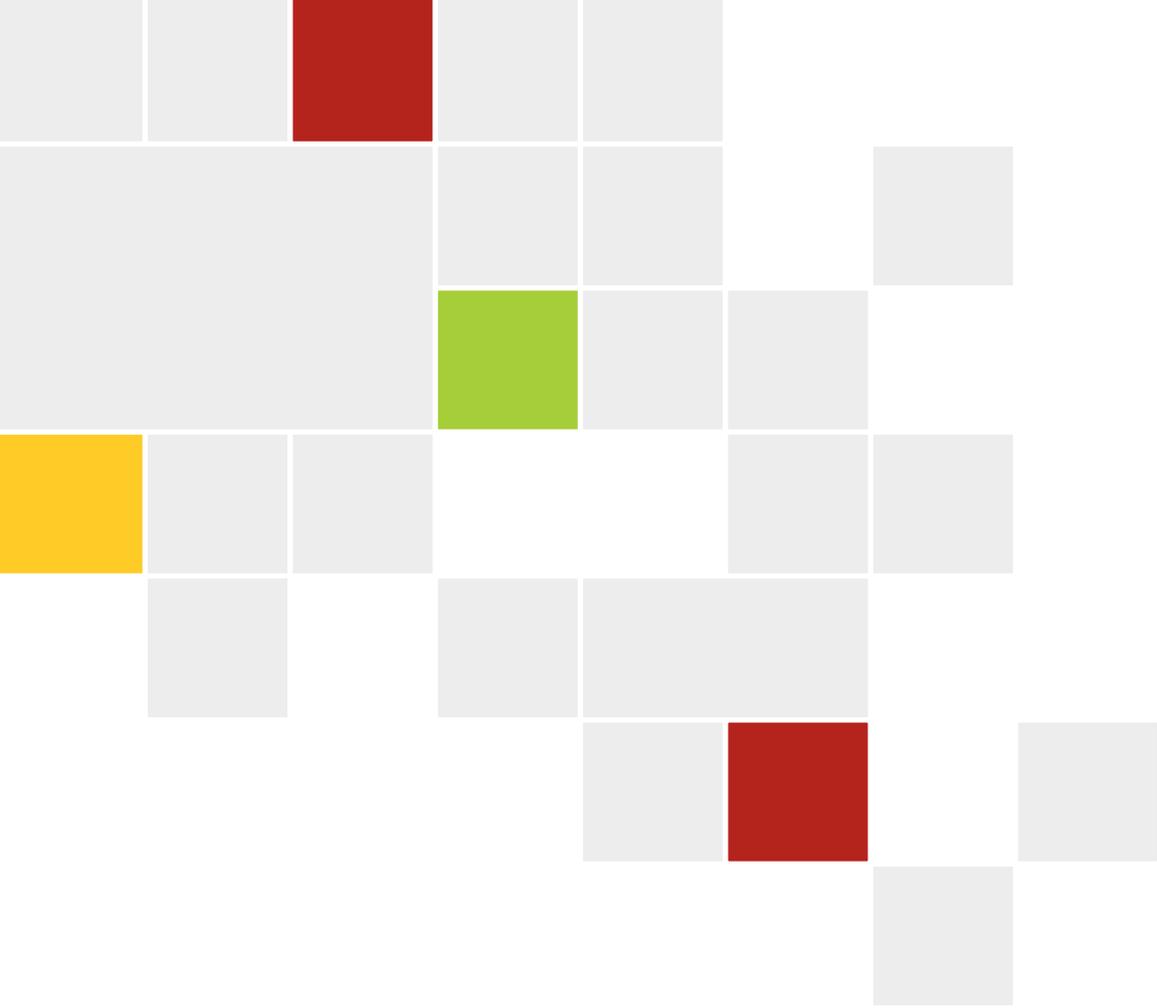
9. SUMMARY & CONCLUSIONS

- 9.1 The scheme is considered to make a positive contribution to the local area, providing both 100% affordable housing and improved employment opportunities for local people. The proposal would also improve the public realm and access through the area, contributing to improved pedestrian and cycle routes. The proposal would provide high quality affordable housing that is supported by the Mayor of London providing homes for young professionals currently living or working in the Borough of Waltham Forest and who currently do not own their own home. The proposal would contribute to infrastructure in the area through S106 payments and CIL contributions.
- 9.2 The site is located within the Major's Lower Lee Valley Opportunity Area and the Olympic Legacy area, which identifies that the areas surrounding the main Olympic site could provide around 32,000 new homes and 1.35 million square metres of new and improved commercial floorspace. The site is also located within Leyton which together with Lea Bridge is identified as a key growth area. By virtue of the adopted and emerging policy designations, it is expected that the context of the area will dramatically become more urbanised.
- 9.3 Noting the emerging context, the improvements to public transport, and to walking and cycling routes as well as the urgent need for housing intensification in the area, the site lends itself well to a well designed high density development. The applicant's intention to provide a high quality development is emphasised through its working partnership with award winning architects Waugh Thistleton.
- 9.4 The scale and height of the development is considered appropriate for an area earmarked for substantial change and has been designed so as not to cause significant harm to the amenity of existing surrounding properties or to consented developments. The proposal would have an acceptable appearance on the streetscape and wider townscape views, with the height stepping up towards the emerging context of the area, ensuring lowest parts of the proposal face the existing context. The proposal would also provide improved landscaped areas and public realm improvements that open up spaces and through routes that have been closed off to the public, allowing space for the improved permeability of pedestrians, cyclists and new public transport routes to serve the area. The roof spaces would be used for both landscaped communal gardens and green roofs, significantly increasing the biodiversity of the site compared to the existing situation.
- 9.5 The proposed development will provide 210 high quality new Pocket homes, all of which will be 100% intermediate tenure to meet the urgent need for affordable homes in the Borough. The proposal will therefore meet the requirements of the Council's strategic planning policies which identify the provision of new affordable homes to be a priority land use. The development will be of exceptional quality, providing secure cycle parking, landscaping, residential amenity space and play space.

- 9.6 The Council's SHMA has identified a substantial shortfall in the provision of affordable tenures of residential accommodation. The assessment identified a requirement to deliver 1,258 affordable housing units which represents 69% of the overall Objectively Assessed Need (OAN) for the borough.
- 9.7 The SHMA identifies that 61% of the net future annual affordable housing need is for housing at intermediate tenures. The proposal would target this identified housing need with affordable housing for middle and modest incomes households who are locked out of home ownership.
- 9.8 The SHMA also identifies that the characteristics of Waltham Forest are changing from an area which was once family-focussed towards an area catering for a growing single and professional population. Again, this proposal would cater for and satisfy the aspirations of this growing population.
- 9.9 The proposal incorporates an exceptional design, which has been carefully considered to positively respond to the scale and massing of the forthcoming adjacent Bywaters site and the emerging development of the Score Centre site and is therefore also reflective of the emerging context of the area. The proposal creates an active frontage along both Osier Way and Auckland Road which will significantly improve the visual appeal of this previously developed (brownfield) site which at present is occupied by an unattractive industrial building, bordered by a high security fence that forms a dead end to Osier Way.
- 9.10 Whilst the innovative development model proposed may appear unconventional in terms of the unit mix and unit sizes (in comparison with the Council's policy aspirations and requirements) the development provides all 210 new homes as 100% intermediate affordable housing, significantly exceeding the Council's policy requirement of 50% provision. The Pocket model, which is consistent across London in several other boroughs, is endorsed by the Mayor of London who is supporting Pocket as a partner developer in delivering new intermediate affordable homes through his Housing Covenant. The model was also accepted by the London Borough of Waltham Forest previously for a 45 unit scheme on Gainsford Road in Walthamstow.
- 9.11 The proposals would also seek to create a greater number of jobs by providing an increased quantum of B1 light industrial floorspace. The floorspace has been designed to be flexible and efficient and therefore a suitable location for dedicated making, mending and upcycling spaces along with possible pottery, carpentry and metal workshops and print making.
- 9.12 The proposed development is a sustainable form of development in line with the NPPF. It addresses the three dimensions to sustainable development referred to in paragraph 8 of the National Planning Policy Framework:

- Economic: it would contribute to building a strong, responsive and competitive economy, by ensuring that the Site is developed in a manner that supports growth;
- Social: it would support strong, vibrant and healthy communities, by contributing significantly to the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment and providing desperately needed market and affordable housing;
- Environmental: it would protect and enhance the natural, built and historic environment, improve biodiversity, minimise waste and pollution and mitigate climate change.

- 9.13 The development would achieve its public benefits without causing significant harm to local amenity, transport conditions, local or strategic views or local or global climate. It would integrate successfully into the evolving fabric of the area, regenerating the site and wider Lower Lea Valley Opportunity Area to a quality befitting its emerging urban location.
- 9.14 The application is supported by a suite of technical documents and reports that demonstrate that the planning proposal would comply with the Council's detailed development management policies, as well as the strategic objectives of the Council's core strategy, and those within the London Plan, which all acknowledge the imperative to provide new homes.
- 9.15 The development would result in the significant benefit of providing 210 new affordable residential dwellings within the borough. The proposal is consistent with the broad objectives of the NPPF, the London Plan and the Council's Development Plan.



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