

London Borough of Redbridge Design Review Panel

Report of Formal Review Meeting: 720 High Road

Tuesday 13 October 2020

Video conference

Panel

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Attendees

[REDACTED]	London Borough of Redbridge
[REDACTED]	London Borough of Redbridge
[REDACTED]	Frame Projects
[REDACTED]	Frame Projects

Apologies / report copied to

[REDACTED]	London Borough of Redbridge
[REDACTED]	London Borough of Redbridge
[REDACTED]	Frame Projects

Confidentiality

This is a pre-application review, and therefore confidential. As a public organisation Redbridge Council is subject to the Freedom of Information Act (FOI), and in the case of an FOI request may be obliged to release project information submitted for review.

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1. Project name and site address

Former 'Homebase' Retail Warehouse, 706-720 High Road, Goodmayes, IG3 8RS

2. Presenting team



Stockwool Architects
Stockwool Architects
Savills
Savills
Fabrik Limited
Fabrik Limited
Clarion Housing Group
Robert West
Elizabeth Comms
Hadley Property
Hadley
Rolfe Judd Planning
Rolfe Judd Planning

3. Planning authority briefing

The 1.25 hectare site comprises a 5,600 sqm Homebase store with a 160 space carpark. To the west of the site there is an Aldi store and to the east there is Singh Saba Gurudwara, a Sikh temple, facing High Road. Opposite the site is St Cedd's Catholic Church, a non-designated Heritage Asset, and the locally listed Ilford Grammar School, also a non-designated Heritage Asset.

The site falls within opportunity Site 73 in the Local Plan, which is allocated to provide 2,500 sqm of retail space and 179 homes. The site has a PTAL rating of 3 and is a five minute walk, from both Goodmayes and Seven Kings stations. There are plans to introduce borough wide Controlled Parking Zone that will support car free development, except for 10% of homes having a disabled parking space, covering the Crossrail Growth area.

The principle for a mixed use high density residential scheme is supported by Redbridge, however they highlight the following points for consideration. Employment levels need to be maintained to expected site allocation levels. Leisure use / community / childcare space should be provided to support the needs of the community and make for a successful public space. The panel's views were requested on: the towers in townscape views; the residential quality of the scheme; defensible space; communal and play space; parking; servicing; and vehicular routes through the site.

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4. Design Review Panel's views

Summary

The panel welcomes the opportunity to further comment on this scheme which will form part of a series of developments along the Crossrail corridor in Redbridge. While panel commends the positive changes made since the previous review, there remain aspects where there is scope for further refinement to ensure the creation of a high quality neighbourhood. The density of development creates a substantial requirement for bike and bin stores. The panel supports the way in which bike stores are integrated, but thinks more needs to be done to minimise the impact of bin stores on the public realm. Similarly, the quantum of development places substantial pressure on the public realm. The landscape design needs further work to maximise the value of open space to residents, and ensure it is well connected to the surrounding area. The panel welcomes the shifting footprints of Blocks A, B and C which helps to break up the bulk of proposals in long views. However, it would like to see more testing of the visual impact of the scheme in townscape views. Detail emerging on the proposal's architectural expression is promising, but the panel would like to see further exploration of this, and would encourage a carefully planned and perhaps calmer approach to brick tones, details and finishes. Engagement with the existing communities will be vital to the scheme's success. The panel would like to see more active engagement which is clearly documented to demonstrate how residents have influenced the proposals. These points are expanded below.

Ground floor uses and activity

- The panel welcomes careful thinking about ground plane activity which has led to a more active and engaging ground floor.
- The introduction of double height entrances and bike stores is commended. The open relationship between the cycle storage and building entrances works well.
- The panel is, however, concerned that bin stores continue to take up a significant amount of frontage. While acknowledging the numerous practical constraints, it urges the design team to think creatively about reducing the visual prominence of bin stores in building frontages and particularly in key locations.
- The panel commends the inclusion of more residential family units at ground floor. Access between the gardens associated with these homes and the wider public realm needs to be resolved.

Public realm, landscape and edges

- In the panel's view the quality of the public realm is still being affected by the density of accommodation that is being proposed on the site.



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- While improvements have been made across the ground floor of proposals, the panel continues to feel that the landscape and public realm of the scheme require further clarity and hierarchy to be successful.
- Routes across the site step and appear fragmented. The panel highlights that the success of the landscape and public realm proposals are vital in knitting the whole development together. The key east west route through the site that is intended to link to adjacent sites in due course does not stand out sufficiently and in places is blocked.
- The widths of paving and tree planting do not create clear legible routes through the site.
- The panel welcomes the inclusion of trees in the landscape. These should be positioned to enhance the clarity and hierarchy of the public realm, and contribute to placemaking.
- There is a sameness to the character across the public realm and the panel suggests more structure and difference might help create hierarchy.
- The panel finds the relationship between the landscape and architecture is not harmonious and feels there is more that could be done to ensure they work together to reinforce the site's overall character.
- For example, the panel would like to see the articulation and shifts which have been made in the massing of Blocks A, B and C influencing the landscape.
- While the panel welcomes the ambition of the south facing play spaces, it is concerned that these may feel somewhat cut off from the rest of the scheme.
- Play space could spill out into the central spine of the scheme, where it would be more visibility and add to the vibrancy of the development.
- There are a high number of small areas of green space that don't always connect and whose purpose isn't clear.
- The panel notes that greenery situated close to tight corners of the service routes may not survive the impact from manoeuvring service vehicles.
- The panel welcomes the inclusion of more roof terraces in the proposals but did not discuss in detail how these are accessed and by which residents.

The central square

- Careful thought is needed about the urban qualities of the central square. The panel suggests that small patches of green space rarely work in urban squares – for example, people tend to cut across lawns.



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- The diagram of the square and the surrounding street lacks clarity. It is not sufficiently enclosed and its edges blend into the surrounding spaces which may limit how effective it can be as a community gathering point.
- The design team should make more use of the square to add clarity to how people move around the site. Traditionally squares are located where there is a change of direction in movement. In its current location and form, the square does not sit entirely comfortably in the urban composition although the applicant has tested alternative locations and has concluded this is their preferred option.
- Clearer thinking is also needed about how people will inhabit the central square in this exposed location open to the site and the main road. For example it feels unrealistic that people will choose to exercise in such an exposed location as shown on the CGIs and if not this then what it is intended to be used for that might be more realistic.

Parking

- The panel strongly advises against a design that requires the removal of trees to allow future disabled parking provision to be brought into use. It will be essential to ensure that any additional future parking will have a minimal impact on the public realm and landscape, particularly after this has become established.

Eastern entrance

- The panel welcomes the removal of the building to the south of the Gurudwara, which gives more space back to the public realm and helps keep the northern end of the route into the site clear.
- The eastern entrance to the site lacks clarity. The panel would like to see careful thought given to this threshold and how people will move through the site from here.
- The design team should think more holistically about the orchard –it could be a space that you spend time in, walk through, drive through or park in. A potential precedent for this is a project in Copenhagen by Kay Fisker, where parking is located underneath a canopy of trees.

Future development

- Part of the proposed play space to the west of the site at the end of the access road blocks a future link to development of the Aldi site which had been expressed as longer term aspiration, and was supported by the panel. The applicant team must decide and agree with the LPA if there is an aspiration for the sites to be linked in the future. If this is not the aspiration it should not be used as design rationale for other elements of the development such as 'aligning geometry' of the east west route.



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Height and massing

- The panel welcomes the shifting footprints of Blocks A, B and C which help to break up the bulk of the scheme in long views.
- Further townscape analysis is needed to refine the layout and massing of these shifting blocks, to ensure elegant proportions are created and that the positive impact is achieved in practice. There is also scope to further explore of how the shifting layout massing can frame high quality landscape and its impact on the quality of residential accommodation.
- The panel notes the value of corner units in residential accommodation. In shifting the blocks, the design team have increased the number of corners. However, the spatial potential of these corner units does not seem to have been fully explored.
- In principle, if the buildings' bulk is carefully articulated, and the public realm works successfully, the panel could find the proposed height of Blocks A, B and C acceptable.
- However, the panel is not convinced by the height and bulk of the lower blocks along High Road, where their deep flank walls would be very prominent.
- It would like to see this bulk and mass broken up. Introducing set backs accommodating balconies could be one way to achieve this.
- Drawings and street views are needed to show the scheme in the context of the two storey buildings on the opposite side of High Road, which will be significantly impacted by the proposals.
- The panel encourages the design team to explore the sense of enclosure to the central square created by the buildings' massing.
- The panel would encourage continuing exploration of the potential for the layout of buildings and landscape to respond to the geometry of the railway line. It thinks this could have a positive impact on the public realm.

Architectural expression

- The panel is encouraged by emerging architectural expression. However, no matter how attractive the architecture is, the development will not be successful, without high quality public realm, and clearly navigable pedestrian routes through the site.
- Subtle changes in brickwork could complement the shifting footprints of Blocks A, B, and C, helping to break up the buildings massing. Some testing of different approaches was demonstrated but it is suggested that further options for different brick colours and patterns are carefully considered in a range of long views.



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- The architectural expression of the lower blocks to the front of the proposals feels very horizontal. This risks emphasising their bulk – especially on flank walls.
- It suggests further exploration of the balance between horizontality and verticality, to help articulate the buildings' mass.
- The material palette uses four different types of bricks and numerous brick details. While variation is welcomed, the panel recommends simplifying the mix of brick colours, textures and details.
- Ensuring that the fronts and backs of the blocks are differentiated through the use of different tones and brick patterns, will help add clarity to the proposals.

Engagement

- The panel reiterates the importance of engaging established communities around the site in the design process. Their insight could help unlock difficult aspects of the development, and the design team could work with them to workshop areas such as the orchard.
- It would like to see documented analysis of conversations with existing communities to understand how they are influencing design proposals.
- The development will have an impact on neighbouring residents. This needs careful consideration in terms of their amenity, quality of life, and building and landscape uses - as well as townscape.
- Careful thought needs to be given to what makes the development specific to this site, not just in form but in how it responds to specific communities.
- The panel suggests that the design team draw the plan of the Gurudwara and its existing landscape to understand how proposals will interact with it.

Next steps

The panel were pleased to see the progress that had been made since the last meeting, particularly in some areas. They would welcome the opportunity to review proposals further once they have been revised in response to the comments above.



Energy Memo: GLA Consultation

Case details

Date of first review:	31/03/2021
Case Name:	706 To 720, High Road, Goodmayes, Ilford
Case Number:	2021/0314
Case Officer:	<div></div>
London Borough:	Redbridge
Application Type (Outline/Hybrid/Detailed):	Detailed
Applicant:	HADLEY GOODMAYES LLP
Energy Consultant:	Environmental Services Design
Document Title:	Energy Assessment
Document Date:	26/01/2021

Development proposals

Use	Floorspace/Number of units
Residential	568 units
Flexible Class E and F1 floorspace at ground and first floor including co-working office space, childcare, digital music academy, growers' market, and sustainable transport hub;	1,287m2

1	Draft London Plan: The Mayor has published his Intend to Publish version of the new London Plan which includes new carbon, energy and heat risk policies (See Policies SI 2, SI 3 and SI 4). Please ensure that you are aware of these new policies in preparation for submitting your planning application. The latest status of the draftnew London Plan can be found here: https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/what-new-london-plan .
2	Guidance: Applicants should follow the GLA Energy Assessment Guidance 2018 (https://www.london.gov.uk/sites/default/files/energy_assessment_guidance_2018_-_update.pdf) which sets out the information that should be provided within the energy assessment to be submitted at Stage 1. Please note that an updated 2020 version of this guidance has been published on the GLA’s website in draft form which aligns with the new London Plan carbon, energy and heat risk policies (https://www.london.gov.uk/sites/default/files/gla_energy_assessment_guidance_april_2020.pdf). Applicants should ensure they are familiar with the new guidance in preparation for submitting their planning application.
3	The following comments summarise key points for you to be aware of in progressing your energy strategy, but you should refer to the guidance for full details.
Net zero carbon target	
4	The Mayor’s draft London Plan requires all major developments (residential and non-residential) to meet his net-zero carbon target . This should be met with a minimum on-site 35% reduction in carbon emissions beyond Part L of 2013 Building Regulations with any carbon shortfall to net zero being paid into the relevant borough’s carbon offset fund.
5	Applicants should submit a completed Carbon Emissions Reporting spreadsheet (https://www.london.gov.uk/what-we-do/planning/planning-applications-and-decisions/pre-planning-application-meeting-service-0) alongside their Stage 1 application to confirm the anticipated carbon performance of the development and should clearly set out the carbon emission factors they are proposing to use in their energy assessment. Although results for both sets of carbon emission factors should be submitted, applicants are encouraged to use the SAP 10.0 carbon emission factors for referable applications when estimating CO2 emission performance against London Plan policies. However, for developments in Heat Network Priority Areas with the potential to connect to a planned or existing district heating network (DHN) the SAP 2012 emission factors may be used provided that the heat network operator has developed, or is in the process of developing, a strategy to decarbonise the network which has been agreed with the GLA.
6	The carbon emission figures should be reported against a Part L 2013 baseline. Sample SAP full calculation worksheets (both DER and TER sheets) and BRUKL sheets for all stages of the energy hierarchy should be provided to support the savings claimed.
Be Lean Demand Reduction	
7	Applicants are expected to meet the London Plan energy efficiency targets: <ul style="list-style-type: none">• Residential – at least a 10% improvement on 2013 Building Regulations from energy efficiency• Non-residential – at least a 15% improvement on 2013 Building Regulations from energy efficiency
8	Applicants will be expected to consider and minimise the estimated energy costs to occupants and outline how they are committed to protecting the consumer from high prices. See the guidance for further detail.
Cooling and Overheating	
9	The Good Homes Alliance (GHA) Early Stage Overheating Risk Tool (https://goodhomes.org.uk/wp-content/uploads/2019/07/GHA-Overheating-in-New-Homes-Tool-and-Guidance-Tool-only.pdf) should be submitted to the GLA alongside the Stage 1 application, if this was not submitted at pre-application stage, to identify potential overheating risk and passive responses early in the design process.
10	Evidence should be provided on how the demand for cooling and the overheating risk will be minimised through passive design in line with the cooling hierarchy. Dynamic overheating modelling in line with CIBSE Guidance should be carried out (TM59 for residential and TM52 for non-residential) for all TM49 weather scenarios.
11	The area weighted average (MJ/m ²) and total (MJ/year) cooling demand for the actual and notional building should be provided and the applicant should demonstrate that the actual building’s cooling demand is lower than the notional.
Be Clean Heating Infrastructure	
12	The applicant should investigate opportunities for connection to nearby existing or planned district heating networks (DHNs). Where such opportunities exist, this should be the priority for supplying heat to the site in line with the London Plan heating hierarchy. Evidence of this investigation should be provided including evidence of active two-way communication with the network operator, the local authority and other relevant parties. This should include information on connection timescales and confirmation that the network has available capacity. See the guidance for full details on the information that should be provided.
13	The site should be provided with a single point of connection and a communal heating network where all buildings/uses on site will be connected. Relevant drawings/schematics demonstrating the above should be provided.
14	The applicant should provide evidence confirming that the development is future proofed for connection to wider district networks now or in the future, where an immediate connection is not available.
15	Where a DHN connection is not available, either now or in the future, applicants should follow the London Plan heating hierarchy to identify a suitable communal heating system for the site. It should be noted that generally ambient loop proposals are not considered wholly compatible with wider LTHW district heating networks
16	The draft London Plan limits the role of CHP to low-emission CHP and only in instances where it can support the delivery of an area-wide heat network at large, strategic sites. Applicants proposing to use low-emission CHP will be asked to provide sufficient information to justify its use and strategic role while ensuring that the carbon and air quality impact is minimised.
Be Green Renewable Energy	
17	All major development proposals should maximise opportunities for renewable energy generation by producing, using and storing renewable energy on-site. This is regardless of whether the 35% on-site target has already been met through earlier stages of the energy hierarchy.
18	Solar PV should be maximised. Applicants should submit the total PV system output (kWp) and a plan showing that the proposed installation has been maximised for the available roof area and clearly outlining any constraints to further PV.
19	Should heat pumps be proposed, applicants will be expected to demonstrate a high specification of energy efficiency measures under be lean, a thorough performance analysis of the heat pump system and, where there are opportunities for DHN connection, that the system is compatible. The detail submitted on heat pumps should include: <ul style="list-style-type: none">a. An estimate of the heating and/or cooling energy (MWh/annum) the heat pumps would provide to the development and the percentage of contribution to the site’s heat loads.b. Details of how the Seasonal Coefficient of Performance (SCOP) and Seasonal Energy Efficiency ratio (SEER) has been calculated for the energy modelling. This should be based on a dynamic calculation of the system boundaries over the course of a year i.e. incorporating variations in source temperatures and the design sink temperatures (for space heat and hot water).c. The expected heat source temperature and the heat distribution system temperature with an explanation of how the difference will be minimised to ensure the system runs efficiently. The distribution loss factor should be calculated based on the above information and used for calculation purposes.d. Whether any additional technology is required for top up or during peak loads (e.g. hot water supply) and how this has been incorporated into the energy modelling assumptions.
Carbon Offsetting	
20	Applicants should maximise carbon emission reductions on-site. Where it is clearly demonstrated that no further carbon savings can be achieved, but the site falls short of the carbon reduction targets, applicants are required to make a cash-in-lieu contribution to the relevant boroughs’ carbon offset fund using the GLA’s recommended carbon offset price or, where a local price has been set, the borough’s’ carbon offset price.
21	Energy strategies should provide a calculation of the shortfall in carbon emissions and the offset payment that will be made to the borough.
New London Plan policies (for information)	
22	Applicants will be expected to investigate the potential for energy flexibility in new developments, include proposals to reduce the amount of capacity required for each site and to reduce peak demand. The measures followed to achieve this should be set out in their energy assessment. See the 2020 guidance for further details.
23	Applicants will be expected to calculate and reduce whole life-cycle carbon emissions to fully capture the development’s carbon footprint. Applicants should submit a whole life-cycle carbon assessment to the GLA as part of the Stage 1 application submission, following the Whole Life-Cycle Carbon Assessment Guidance and using the GLA’s reporting template (https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/planning-guidance/whole-life-cycle-carbon-assessments-guidance-pre-consultation-draft). Applicants will also be conditioned to submit a post-construction assessment to report on the development’s actual WLC emissions.
24	Applicants will be expected to monitor on their development’s energy performance and report on it through an online monitoring portal. Applicants should review the ‘Be seen’ energy monitoring guidance to ensure that they are fully aware of the relevant requirements to comply with the ‘be seen’ policy (https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/planning-guidance/be-seen-energy-monitoring-guidance-pre-consultation-draft). A commitment should be provided that the development will be designed to enable post construction monitoring and that the information set out in the ‘be seen’ guidance is submitted to the GLA’s portal at the appropriate reporting stages. This will be secured through suitable legal wording.

[REDACTED]

From: [REDACTED]@london.gov.uk>
Sent: 23 June 2021 15:29
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: 2021/0314/S1 706 To 720, High Road, Goodmayes, Ilford 0680/21
Attachments: Air quality.docx; Circular economy.xlsx; Green infrastructure.docx; Water.docx; Whole lifecycle carbon.docx; 20210314 706 To 720, High Road, Goodmayes, Ilford Post Stage 1 GLA Consultation - Energy Memo 2021.xlsx; London Plan policy requirements 0499 High Road Goodmayes.docx

Afternoon [REDACTED],

I hope you are both well.

Please see attached comments with respect to **energy, whole lifecycle carbon, air quality, circular economy, water and green infrastructure** which should be addressed prior to Stage 2 referral.

In terms of **affordable housing** – the affordability of the intermediate units should also be secured.

Our comments with respect to **transport** issues are as follows and should be addressed prior to proceeding to Stage 2:

1. Clearer, more detailed plans of cycle storage. Until TfL has this we are unable to confirm compliance with LP T5 and its design requirements.
2. Mode share analysis re-visit to address concerns including too-low cycle share and scrutiny of apportionment of rail and underground vs bus trip generation – considering the latter mode can be used more conveniently than the more distant stations I am surprised it is not higher. Only when agreement on these points has been reached can TfL comment on what/whether contribution level to public transport is appropriate.
3. Basic information on how delivery and servicing will operate – given this is a busy area it is not acceptable or practicable to leave this until after determination as the applicant has responded.
4. A commitment to contributing to wayfinding – there is no mention of this in the draft Heads of Terms, though I note there are un-costed highway improvements listed.
5. Confirmation of the dimension of the clear width buffer strip between the site and the railway lines.
6. Documents supplied by 'Stockwool' which may or may contain have some relevant information are referenced in the response to the GLA however these need to be supplied/explained further as they don't appear to be on the LBR planning portal.

The provision of active ECVF for all spaces (BB) and a parking management plan to be secured by condition is welcomed.

With respect to **fire safety**, please could you provide a plan to show the location of the evacuation lifts.

Finally, please also see attached requirements relating to **'be seen'** and **zero carbon** that take effect since the adoption of the London Plan and should be addressed.

Kind regards,

[REDACTED]
Principal Strategic Planner
GREATERLONDONAUTHORITY
City Hall, The Queen's Walk, London SE1 2AA

[REDACTED]
london.gov.uk/what-we-do/planning

[REDACTED] london.gov.uk

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From: [REDACTED]@redbridge.gov.uk>
Sent: 28 May 2021 09:44
To: [REDACTED]@london.gov.uk>
Subject: 2021/0314/S1 706 To 720, High Road, Goodmayes, Ilford 0680/21
[REDACTED]

In advance of the Stage 2 as we are planning on taking this to the 15 July committee please find enclosed the responses to the GLAs comments. Any comments could you let me know in next 2 weeks (by 11 June).

Best regards

[REDACTED]
Regeneration & Culture
London Borough of Redbridge
11th floor, Lynton House, 255-259 High Road, Ilford, Essex IG1 1NN
[REDACTED]

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Save time, go online: www.redbridge.gov.uk



From: [REDACTED]@rolfe-judd.co.uk>

Sent: 25 May 2021 17:47

To: [REDACTED]

Subject: RE: 0680/21 706 High Rd

Hi [REDACTED]

Further to [REDACTED] email, please find enclosed (via the We Transfer link) our response to the consultee comments relating to the proposed redevelopment of 706 -720 High Road, Goodmayes.

<https://we.tl/t-Pun9Y2dIPr>

Our position on each item is summarised within the cover letter, which I have attached for ease of reference. We have also produced a table detailing our response to the GLA items (also attached). Supplementary documentation has been submitted to support our position on these points.

I trust this is self-explanatory, but please let me know if you have any queries.

Please confirm receipt of the documentation.

Kind regards,

[REDACTED]

[REDACTED]

Rolfe Judd

Architecture **Planning** Interiors

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0499 Pre-stage 2 Air Quality comments

The applicant's air quality consultant, Phlorum, provided a response (12th May 2021) to the Stage 1 consultation memo, which has been reviewed.

The applicant has committed to NOx filtration on all ground and first floor air intakes fronting Ilford High Road. It is recommended that this be conditioned to ensure the filtration is implemented as stated in Phlorum's response.

Provided the required filtration is implemented and secured by condition, there are no outstanding concerns. The proposed development can be deemed compliant with London Plan air quality policies.

0499 Pre-stage 2 comments – Green infrastructure

The applicant has addressed the comments raised at Stage 1.

The applicant suggests that a Construction Environment Management Plan (CEMP) may be suitable to detail protection of the adjacent Site of Importance for Nature Conservation (SINC) through construction. This is considered reasonable and should be conditioned, should the proposal be granted permission.

The urban greening proposed has been reviewed and the UGF increased accordingly to 0.41, which is compliant with Policy G5.

The Arboricultural Assessment identifies the removal of 18 trees (16 category C and 2 category U). Over 100 trees are proposed as part of the scheme.

The responses provided are positive and address the matters raised at Stage 1.

No further information is required.

0499 Pre-stage 2 comments – Water

The Applicant has provided a plan showing the indicative exceedance flood flow routes and has confirmed that rain gardens will be included within the scheme proposals. As suggested, the proposed SuDS should be stated in any decision notice to ensure they are included within the scheme as it progresses through further stages of design.

0499 pre-stage 2 Whole Lifecycle Carbon comments

The applicant has submitted a WLC report which appears to cover much of the assessment requirements, however an Excel version to the GLA WLC template must also be submitted to allow a full review to be completed against the guidance. The WLC templates are available here:

<https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance-and-spgs/whole-life-cycle-carbon-assessments-guidance-consultation-draft>

The applicant should submit a WLC assessment template in full with all sections completed. This is important to allow results to be recorded and tracked through to the post-construction stages, and to allow a proper review of the results against material quantities and other assumptions made.

As per the GLA 'Whole Life-cycle Carbon Assessment – draft for consultation – guidance document' this assessment should comply with EN 15978 and cover all building elements. Please also ensure sequestered carbon is reported separately in the template, as a negative figure.

Two assessments have been included in the report submitted but Assessment 2 should account for decarbonisation to both operational and embodied carbon (Assessment 2). Carbon emissions during lifecycle modules A1-A5 and B1 of Assessment 2 should not include the decarbonised figures. Please refer to the GLA WLC guidance documents and RICS PS for more details.

Green Infrastructure Memo: Stage 1 consultation

706-720 Goodmayes High Road**19/04/2021**

To / Case officer:	
From:	
Case name:	706-720 Goodmayes High Road
London Borough:	Redbridge
Case number:	2021/0314
Outline/Full:	Full
Applicant:	Hadley Goodmaynes LLP
Landscape Plan:	Urban Greening Factor Plan and Landscape General Arrangement Plans
DAS:	Goodmayes Homebase Site DAS February 2021

Overview of assessment

The applicant is requested to provide additional information in relation to green infrastructure policy. The following is requested:

- Assessment of potential impacts on the adjacent Site of Importance for Nature Conservation.
- Improvement to the Scheme's Urban Greening Factor.

Proposal

"Redevelopment of retail warehouse for mixed use development comprising 7 buildings, ranging up to 20 storeys in height. Provision of flexible Class E and F1 floor space at ground and first floor and up to 568 residential dwellings (Class C3). Provision of central public square, new areas of public realm, private landscaped amenity spaces, ancillary car parking and ancillary cycle & refuse stores. This is a phased development for the purposes of CIL."

Policy Review

Biodiversity- London Plan Policy G6: Biodiversity and Access to Nature

1. The Ilford to Chadwell Heath Railsides Site of Importance for Nature Conservation (SINC) is located immediately south of the site. As requested at the pre-app stage, the application should demonstrate how impacts on the SINC have been avoided in line with Policy G6 of the London Plan. This should include an assessment of the potential impacts to the SINC, specifically construction impacts and (with reference to Paragraph 8.6.4 of the London Plan) indirect impacts of noise and lighting.
2. The application demonstrates biodiversity net gain.

Green Infrastructure and Urban Greening - London Plan Policy G1: Green Infrastructure and London Plan Policy G5: Urban Greening

3. The applicant has calculated the UGF of the proposed development as 0.3, which is below the target set by Policy G5 of the London Plan for predominantly residential development.
4. The applicant should review the UGF calculation for consistency with other application drawings. In particular, the 'Roof Plan' drawings (3514-A-STO-PL-20-126_03 and 3514-A-STO-PL-20-127_03) appear to show greater coverage of brown roofs than that considered on the UGF Plan (1001 PL04).
5. The applicant should also review the design, seeking to improve the quality or quantity of the proposed greening, in order to increase the application's UGF and achieve the specified target. This should include consideration of the proposed green roofs given that the majority of roofs are proposed to be sedum roofs which do not provide as much benefit as intensive green roofs.
6. Further features for consideration may include the addition of a green wall across sections of the building façade and replacement of amenity grassland with flower rich grassland.

Trees- London Plan Policy G7: Trees and Woodlands

7. The planning statements explains that 18 on site trees have been assessed. All 18 trees were found to be of low value and are all proposed for removal. The Scheme proposes 100 new trees to be planted. The arboricultural assessment concluded that the "proposals are considered to result in a significant improvement in the arboricultural value of the site".
8. For biosecurity reasons, the applicant should seek to plant a broad range of tree species, with large-canopied trees are preferred.

[REDACTED]

From: [REDACTED]
Sent: 19 April 2021 12:48
To: [REDACTED]
Subject: RE: SAC at Homebase 0680/21 - ecology comments
Attachments: Place Services ecology comments Development Site At Car Park And 706 To 720 High Rd Goodmayes 068021.pdf

Dear [REDACTED]

As requested by [REDACTED], we have reviewed the submitted details for development 0680/21 and attached our comments which particularly relate to impacts on Epping Forest SAC.

If you have any queries or have any new information which may overcome our holding objection, please let me know and we can provide updated comments on its sufficiency.

Once the applicant has submitted their *Information to support HRA report*, if you would like us to prepare the LPA's project-level HRA Appropriate Assessment for formal consultation with Natural England, again please get in touch.

Suzanne has also sent me your pre app advice for Mill Road Ilford and it would be very helpful if you can clarify the need for ecology comments on the Bridge feasibility for green link on west side of borough to support the Mill Road scheme. Thanks.

I would advise that the principles for access to SANG and SAMM contributions for other residential schemes either at pre app or submissions will remain the same as comments in this consultation response.

I'm happy to arrange a Teams meeting to discuss this and/or the proposed ecology surgery for planners & being consulted as part of the pre-app process on schemes with over 100 units in the ZOI - just let me know when would suit you.

Best wishes

[REDACTED]

[REDACTED] S

[REDACTED] / PlaceServicesecology@essex.gov.uk
web: www.placeservices.co.uk
linkedin: uk.linkedin.com/in/sue-hooton-04811178



From: Suzanne Lansley <Suzanne.Lansley@redbridge.gov.uk>
Sent: 08 April 2021 16:15

To: [REDACTED]
Subject: FW: SAC at Homebase 0680/21

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender's email address and know the content is safe.

Kind Regards

[REDACTED]
[REDACTED]
Regeneration and Culture
London Borough of Redbridge
Floor 11, Lynton House, 255 – 259 High Road, Ilford, Essex IG1 1NN

[REDACTED]@redbridge.gov.uk
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London Borough of

Redbridge



From: [REDACTED]@redbridge.gov.uk>

Sent: 30 March 2021 16:59

To: [REDACTED]

Subject: SAC at Homebase 0680/21

Hi below is an approach in the HRA statement and legal advice gained at pre app stage.

Legal say collect 30 pounds per home within SAC (30-50 homes)

Dear [REDACTED]

Goodmayes – Habitat Regulations Assessment

Greengage Environmental Ltd have been appointed to advise on ecological issues associated with the proposed redevelopment of the former Homebase warehouse in Goodmayes, in the London Borough of Redbridge (here after 'Redbridge').

This letter has been produced to detail the approach to mitigating of potential impacts upon the Epping Forest Special Area of Conservation (SAC) associated with the population increase and potential increased recreational pressure the proposed development may influence.

Any proposed development which will generate additional residential dwellings within a 6.2km radius of Epping Forest SAC is considered by Nature England (NE) in their interim advice to local planning authorities (LPA) within this radius, dated 6th March 2019. Within this advice NE set out that each LPA when considering large scale residential developments (100 units plus) should propose strategic and bespoke mitigation measures on a case by case basis and that developers will deliver some indicated mitigation measures as well based on the scale, proximity to the SAC and ease of access to the SAC and availability of other green space.

Only the north-western corner of the proposed development site falls within the 6.2km buffer for Epping Forest SAC. The proposed development will only have a portion of one block (Block E1) within this zone. This represents only a small proportion of the population likely to eventually inhabit the site (see plan in Appendix 1).

It is our understanding that Redbridge have indicated a s106 contribution to mitigate the potential recreational impact that might result from residents in Block E1 through enhancing green space close to the proposed development. In addition, we set out below the additional measures that are within the development that NE also indicate in their March 2019 interim advice letter should be provided.

In order to provide adequate high-quality green space within the proposed development, a comprehensive landscaping and green infrastructure strategy has been implemented to increase the ecological value of the site and reduce the likelihood of residents traveling to Epping Forest.

Specifically, intensive green roofs and terraces are provided across the buildings on site, in addition to high proportions of play space and allotments within the site boundary.

This provides on-site green infrastructure within the development and will minimise any predicted increase in recreational pressure to the SAC by containing recreational activities within or around the development site boundary. This will actively encourage visits away from the SAC.

We trust this provides you with details on how the proposed development at Goodmayes has considered the potential recreational pressures resulting from the residents in Block E1 that are within the 6.2km buffer from Epping Forest SAC, and has actively sought design solutions within the site boundary to encourage these residents to use the green infrastructure within the site boundary, rather

1

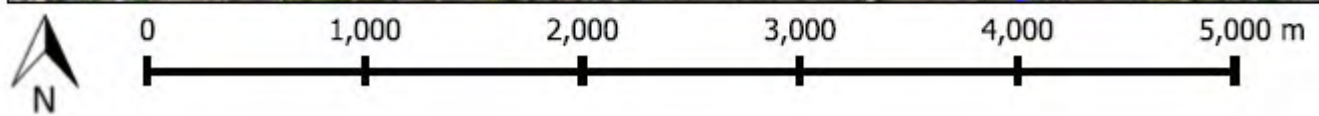
www.greengage-env.com

Greengage Environmental Ltd Registration No. 08155937 Registered Address: Camburgh House, 27 New Dover Road, Canterbury, Kent, CT1 3DN



than seeking recreation at the SAC. Furthermore, that the s106 contribution to Redbridge will further enhance green space close to the proposed development and encourage recreational activities there rather than at the SAC.

If you have any queries or comments, then please let me know.



Best regards

[REDACTED]
Regeneration & Culture
London Borough of Redbridge
11th floor, Lynton House, 255-259 High Road, Ilford, Essex IG1 1NN

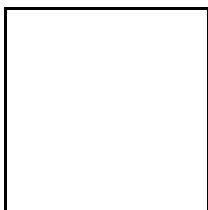
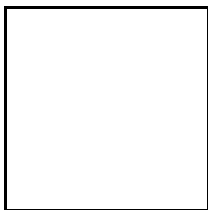
[REDACTED]
[REDACTED]@redbridge.gov.uk

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19th April 2021

██████████
Regeneration & Culture
London Borough of Redbridge
11th Floor
Lynton House
255-259 High Road
Redbridge IG1 1NN

By email only

Thank you for requesting advice on this discharge of condition from Place Services' ecological advice service. This service provides advice to planning officers to inform the London Borough of Redbridge's planning decisions with regard to potential ecological impacts from development. Any additional information, queries or comments on this advice that the applicant or other interested parties may have, must be directed to the Planning Officer who will seek further advice from us where appropriate and necessary.

Dear ██████████

Application: 0680/21
Location: Development Site At Car Park And 706 To 720, High Road, Goodmayes, Ilford
Proposal: Demolish existing structures. Redevelopment of retail warehouse for mixed use development comprising 7 buildings. Provision of flexible use space at ground and first floor. Creation of up to 568 residential units with associated public space, private landscaped amenity spaces, ancillary car parking and cycle and refuse stores. (Summary).

Recommended Refusal	
No ecological objections	
Recommended Approval subject to attached conditions	
Further information required prior to determination	x
Recommended Approval of Details	

Thank you for consulting Place Services on the above application.

Summary

We have reviewed the Design and Access Statement submitted by the applicant (Stockwool, Feb 2021), the Illustrative Masterplan – Proposed Drg no. 3514-A-STO-PL-90-104_03 (Stockwool, Feb 2021) and correspondence relating to likely impacts from the development on designated sites. We note that there are no ecology documents available on the LPA's planning portal and this issue is not included in the



Design and Access Statement, so identification of likely impacts and proportionate mitigation has yet to be provided.

We are therefore not satisfied that there is currently sufficient ecological information available for determination of this application.

We note that this development is relevant to Natural England's interim advice to the LPA regarding the emerging strategic approach relating to Epping Forest Special Area of Conservation (SAC) Mitigation Strategy (ref. 259129, 6 March 2019). There are predicted impacts of recreational pressure from new residential growth and part of the site lies within the 6.2km Zone of Influence and we recommend that the applicant provides an *Information to support HRA report* as the LPA will need to prepare its own project-level Habitats Regulations Assessment (HRA) report for consultation with Natural England.

As a large scale residential development (100 units plus), the Natural England advice includes measures for on-site open space/green infrastructure and we do not consider that the illustrative masterplan contains sufficient to support the daily recreational needs of new residents e.g. 2.7km¹ walking route, off-lead areas for exercising dogs. As on-site housing densities for this development make delivery of on-site SANG difficult, we recommend a SAMM contribution is requested as part of a bespoke mitigation package to secure avoidance and mitigation measures to be embedded into the design of the scheme. The HRA for the development will need to assess the likely impacts from the development (Block E only) and as mitigation measures will be needed, the Appropriate Assessment report will need to consider what mitigation measures are necessary to avoid adverse impacts on the integrity of this Habitats site either alone or in combination with other plans and projects.

We note and support the request made by the LPA for the applicant to:

1. Provide on site mitigation in respect of SANG (Suitable Alternative Natural Greenspace).
and
2. Pay the £30 per dwelling SAC payment for those homes within 6.2km of the SAC area (the definition of which is the original and not the narrowed alternative boundary you state).

As a minimum, we advise that SANG provisions should include:

- High-quality, informal, semi-natural areas
- Circular dog walking routes of 2.7 km¹ within the site and/or with links to surrounding public rights of way (PROW)
- Dedicated 'dogs-off-lead' areas

¹ Jenkinson (2013) Planning for dog ownership in new development: reducing conflict -adding value (Hampshire County Council)



- Signage/information leaflets to householders to promote these areas for recreation
- Dog waste bins
- A commitment to the long-term maintenance and management of these provisions

However, the unique draw of the above Habitats site means that, even when well-designed, 'on-site' provisions are unlikely to fully mitigate impacts when all residential development within reach of the Forest is considered together 'in combination'.

We advise that the provision of on-site SANG will need to support phased occupation and the daily recreational needs of new residents. As this is a phased development, the trigger for financial contribution will need to be set as on commencement of the phase containing Block E to allow delivery of mitigation measures at Epping Forest SAC prior to occupation.

Recommendations

1. We recommend that this additional information identified above is provided to support HRA as it is necessary to provide certainty of likely impacts on Habitats sites, prior to determination of this application. A record of the details of the greenspace (to be secured by a condition of any consent) and the financial contribution (to be secured by a legal agreement) will need to be included in the HRA Appropriate Assessment for formal consultation with Natural England.
2. We also recommend that in addition to details relating to impacts on designated sites, to secure measurable net gains for biodiversity, as outlined under Paragraph 170d of the National Planning Policy Framework 2019, reasonable biodiversity enhancement measures will also need to be provided. Natural England's interim advice notes that environmental gains such as green and brown rooves can be delivered within urban development and we would encourage the inclusion of integrated bat and bird boxes to deliver permanent biodiversity gain.

The above information is needed to enable the LPA to demonstrate its compliance with its statutory duties including compliance with the Conservation of Habitats and Species Regulations 2017 (as amended) and its biodiversity duty under s40 NERC Act 2006.

We look forward to working with the LPA and the applicant to receive the additional information required to support a lawful decision and overcome our holding objection.

Please contact me with any queries.

Yours sincerely

[Redacted signature block]

Place Services at Essex County Council



Place Services provide ecological advice on behalf of the London Borough of Redbridge

Please note: This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to this particular matter.

From: [REDACTED]@london.gov.uk>
Sent: 10 May 2021 18:19
To: [REDACTED]@rolfe-judd.co.uk
Subject: RE: 2021/0314/S1 706 To 720, High Road, Goodmayes, Ilford 0680/21
Attachments: 2021_0314_706-720 Goodmayes High Rd_Stage 1 GI comments.doc; 3.706 to720 HighRoad_GLA_CE Memo_2.5.21 (1).xlsx

Afternoon [REDACTED],

Please see attached comments with respect to green infrastructure and circular economy.

All issues identified within the Stage 1 report and accompanying technical comments should be addressed prior to Stage 2 referral.

Kind regards,

[REDACTED]
GREATERLONDONAUTHORITY
City Hall, The Queen's Walk, London SE1 2AA

[REDACTED]
[london.gov.uk](https://www.london.gov.uk)

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From: [REDACTED]
Sent: 24 April 2021 13:57
To: [REDACTED]
Subject: RE: 2021/0314/S1 706 To 720, High Road, Goodmayes, Ilford 0680/21
Dear [REDACTED]

Following the issue the of the report on Monday, please see attached the detailed comments with respect to transport, energy and air quality.

Colleagues are currently reviewing information regarding circular economy and green infrastructure. I am on annual leave next week (w/c 26 April), but I will send you these comments as soon as possible upon my return.

Kind regards

[REDACTED]
Principal Strategic Planner
GREATERLONDONAUTHORITY
City Hall, The Queen's Walk, London SE1 2AA

[REDACTED]
[london.gov.uk](https://www.london.gov.uk)

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From: [REDACTED]@redbridge.gov.uk>
Sent: 21 April 2021 17:35
To: [REDACTED]@london.gov.uk>
Subject: RE: 2021/0314/S1 706 To 720, High Road, Goodmayes, Ilford 0680/21

Many thanks for the Stage 1. We look forward to the air quality and circular economy (para 78) comments the report states are expected.

Do you also send over TfL comments separately or energy comments also?

It appears you couldn't see the Arboricultural report and it is now available on line (not sure if you missed it)

Best regards

[REDACTED]er
Regeneration & Culture
London Borough of Redbridge

11th floor, Lynton House, 255-259 High Road, Ilford, Essex IG1 1NN

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From: Greater London Authority <[REDACTED]>

Sent: 20 April 2021 18:32

To: [REDACTED]@redbridge.gov.uk>

Subject: 2021/0314/S1 706 To 720, High Road, Goodmayes, Ilford

Dear All

Please find attached the decision letter and report relating to 2021/0314/S1, 706 To 720, High Road, Goodmayes, Ilford, Development Site At Car Park And 706 To 720, High Road, Goodmayes, Ilford in Redbridge.

Regards

[REDACTED]

[REDACTED]

Greater London Authority

[REDACTED]

[REDACTED]

[ref:a0i4J000002gRQVQA2:ref]



Green Infrastructure Memo: Stage 1 consultation

706-720 Goodmayes High Road

19/04/2021

To / Case officer:	██████████
From:	██████████
Case name:	706-720 Goodmayes High Road
London Borough:	Redbridge
Case number:	2021/0314
Outline/Full:	Full
Applicant:	Hadley Goodmaynes LLP
Landscape Plan:	Urban Greening Factor Plan and Landscape General Arrangement Plans
DAS:	Goodmayes Homebase Site DAS February 2021

Overview of assessment

The applicant is requested to provide additional information in relation to green infrastructure policy. The following is requested:

- Assessment of potential impacts on the adjacent Site of Importance for Nature Conservation.
- Improvement to the Scheme's Urban Greening Factor.

Proposal

"Redevelopment of retail warehouse for mixed use development comprising 7 buildings, ranging up to 20 storeys in height. Provision of flexible Class E and F1 floor space at ground and first floor and up to 568 residential dwellings (Class C3). Provision of central public square, new areas of public realm, private landscaped amenity spaces, ancillary car parking and ancillary cycle & refuse stores. This is a phased development for the purposes of CIL."

Policy Review

Biodiversity- London Plan Policy G6: Biodiversity and Access to Nature

1. The Ilford to Chadwell Heath Railsides Site of Importance for Nature Conservation (SINC) is located immediately south of the site. As requested at the pre-app stage, the application should demonstrate how impacts on the SINC have been avoided in line with Policy G6 of the London Plan. This should include an assessment of the potential impacts to the SINC, specifically construction impacts and (with reference to Paragraph 8.6.4 of the London Plan) indirect impacts of noise and lighting.
2. The application demonstrates biodiversity net gain.

Green Infrastructure and Urban Greening - London Plan Policy G1: Green Infrastructure and London Plan Policy G5: Urban Greening

3. The applicant has calculated the UGF of the proposed development as 0.3, which is below the target set by Policy G5 of the London Plan for predominantly residential development.
4. The applicant should review the UGF calculation for consistency with other application drawings. In particular, the 'Roof Plan' drawings (3514-A-STO-PL-20-126_03 and 3514-A-STO-PL-20-127_03) appear to show greater coverage of brown roofs than that considered on the UGF Plan (1001 PL04).
5. The applicant should also review the design, seeking to improve the quality or quantity of the proposed greening, in order to increase the application's UGF and achieve the specified target. This should include consideration of the proposed green roofs given that the majority of roofs are proposed to be sedum roofs which do not provide as much benefit as intensive green roofs.
6. Further features for consideration may include the addition of a green wall across sections of the building façade and replacement of amenity grassland with flower rich grassland.

Trees- London Plan Policy G7: Trees and Woodlands

7. The planning statements explains that 18 on site trees have been assessed. All 18 trees were found to be of low value and are all proposed for removal. The Scheme proposes 100 new trees to be planted. The arboricultural assessment concluded that the "proposals are considered to result in a significant improvement in the arboricultural value of the site".
8. For biosecurity reasons, the applicant should seek to plant a broad range of tree species, with large-canopied trees are preferred.

[REDACTED]

From: [REDACTED]
Sent: 14 May 2021 15:33
To: [REDACTED]
Cc: [REDACTED] n
Subject: RE: 0680/21 - 706 High Road scheme for over 560 homes in 4 to 20 storey blocks
Attachments: HIA.pdf

Hi [REDACTED]

I've added comments to the pdf (along with a colleague) as I thought that might be the easiest way of tracking them to the relevant part of the document. I do hope they are some way helpful and for future HIA input, I'll be able to provide a more systematic way of doing it I think. Some of my comments may be easily answerable and others may, you feel, be of low relevance potentially. But I can learn as I get more used to the way the planning system works. My main queries are around the assumptions on numbers of children and the estimated provision for them, and the impact of noise and air pollution on the residents during periods of hot weather. Anyway, hope this is helpful.
Best wishes

[REDACTED]
London Borough of Redbridge
[REDACTED]



From: [REDACTED]
Sent: 12 May 2021 16:36
To: [REDACTED]@redbridge.gov.uk>
Subject: 0680/21 - 706 High Road scheme for over 560 homes in 4 to 20 storey blocks

[REDACTED]

Would you be able to comment on this proposal in the next week?

To see the HIA its found by searching with the above reference to this weblink
<https://planning.redbridge.gov.uk/redbridge/search-applications/> order by description and it's the 3rd page down when doing 50 records per page

Best regards

[REDACTED]
Regeneration & Culture
London Borough of Redbridge

From: [REDACTED]
Sent: 22 March 2021 15:25
To: Planning Consultations
Subject: 0680/21 Development Site At Car Park And 706 To 720, High Road, Goodmayes, IG3 8RS

I have reviewed the Ground Investigation Report [Ref: C15068] by Ground Engineering Ltd dated September 2020 submitted in support of the above application.

The site was extensively re-developed in c. 1999. Remediation comprised the excavation of hydrocarbon impacted soils and the removal of underground storage tanks (USTs) prior to re-development.

Site works were undertaken in July 2020 to assess the ground conditions for the proposed application above.

- Elevated levels of lead and benzo[a]pyrene were measured (when compared to residential with home grown produce screening levels and residential without home grown produce respectively).
- Total petroleum hydrocarbons (TPHs) were low (maximum TPH-aromatic 140 mg/kg) at TP8 (0.55m) and not considered significant
- Made ground soils would not be suitable in any proposed garden or landscaped areas of the residential development
- Elevated contaminants measured in groundwater when compared to drinking water standard thresholds.
- Hydrocarbon odours were noted in standpipes BH7 and BH12.
- Elevated VOCs (vapours) identified in all standpipe installations
- Site underlain by between 0.3m and 2.8m of Made Ground.
 - Very high methane readings on three separate visits at BH7 (97.1% to 100% v/v) – is there a gas leak in the area? (depth to groundwater 2.68 – 2.95 mbgl)
 - Gas sampled on 18/8/20 from BH7 at d = 0.4m; gas composition not quantifiable (p93/103 in report)
 - Water sampled and analysed on 11/8/20 from BH7; TPH-aliphatic concentration = 7000 mg/kg (p78/103 in report)
 - Explanation given: gas monitor has been affected by hydrocarbon vapours but hydrocarbon concentrations are not significant in the soil (tested at 4.2m – 4.7m); maybe its vapours above the groundwater? Is this significant for pile design?
 - BH12 high CO2 readings, depleted oxygen and oil noted
- Results indicate the site falls into Characteristic Situation 2 (CS2)
- Gas resistant membrane required
- Report summary: Low risk of contamination on areas tested. However investigation was not possible beneath the footprint of the Homebase building and additional investigation would be considered beneficial.
- Recommendations for potable water pipework need to be given and full ground gas mitigation measures (inc membrane, void spaces and engineering drawings)

Please attach the following land contamination condition:

The following shall be carried out by suitably qualified persons in accordance with Environment Agency: Land Contamination Risk Management (LCRM) guidance and British Standard 10175:2011 + A2:2017 'Investigation of Potentially Contaminated Sites – Code of Practice'.

1. Based on the findings in the Ground Investigation Report [Ref: C15068] by Ground Engineering Ltd dated September 2020, the following details are required before the development hereby permitted commences at the site:

a) An Options Appraisal (OA) shall be undertaken to mitigate the unacceptable risks confirmed in the Ground Investigation Report. The OA shall include all feasible remediation methods to address the relevant contaminant linkages in the updated Conceptual Site Model; an evaluation of these options and the final remediation method(s) selected to reduce or control the risks associated with the site development shall be given. The OA shall be submitted to the LPA for approval prior to any remediation works being undertaken at the site. The scheme once completed must ensure that the site will not qualify as 'Contaminated Land' under Part 2A of the Environmental Protection Act 1990 in relation to its intended use.

2. After development commences and prior to occupation:

a) If during the course of development any contamination is discovered that was not previously identified, it must be reported without delay to the LPA. The development shall not proceed further until an assessment of that contamination and the preferred remedial measure to reduce or control the risks, has been submitted to, and approved in writing by the LPA. If no contamination is found, then this shall be detailed in the remediation Verification Report.

b) A Verification Report, confirming completion and adequacy of the remediation scheme, shall be submitted to and approved in writing by the LPA before any part of the development is first occupied.

Reason: In the interests of future health of occupiers of the development, in accordance with Policy LP24.

Regards

[REDACTED]
Environmental Health Enforcement Officer
(Contaminated Land Lead)
10th Floor/Front Lynton House
[REDACTED] [REDACTED]

-----Original Message-----

From: Planning Consultations

Sent: 11 March 2021 11:29

To: Community Safety (Env Health Planning Consultations) <PTCentralAdmin@redbridge.gov.uk>

Subject: London Borough of Redbridge - 0680/21 Development Site At Car Park And 706 To 720, High Road, Goodmayes, Ilford

Application: 0680/21

Location: Development Site At Car Park And 706 To 720, High Road, Goodmayes, Ilford Demolish existing structures. Redevelopment of retail warehouse for mixed use development comprising 7 buildings. Provision of flexible use space at ground and first floor. Creation of up to 568 residential units with associated public space, private landscaped amenity spaces, ancillary car parking and cycle and refuse stores. (Summary).



[REDACTED]

From: [REDACTED]@london.gov.uk>
Sent: 24 April 2021 13:57
To: [REDACTED]
Subject: RE: 2021/0314/S1 706 To 720, High Road, Goodmayes, Ilford 0680/21
Attachments: 2021_0314 706-720 High Road Goodmayes_AQ Stage 1.docx; 20210314 706 To 720, High Road, Goodmayes, Ilford GLA Consultation - Energy Memo 2021 (1).xlsx; High Road 706-720 - Stage 1 TfL Comments -Final.docx

Dear [REDACTED]
Following the issue the of the report on Monday, please see attached the detailed comments with respect to transport, energy and air quality.
Colleagues are currently reviewing information regarding circular economy and green infrastructure. [REDACTED]
[REDACTED] but I will send you these comments as soon as possible upon my return.

Kind regards

[REDACTED]
[REDACTED]
GREATERLONDONAUTHORITY
City Hall, The Queen's Walk, London SE1 2AA
[REDACTED]

london.gov.uk/what-we-do/planning

[REDACTED]@london.gov.uk

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From: [REDACTED]@redbridge.gov.uk>

Sent: 21 April 2021 17:35

To: [REDACTED]@london.gov.uk>

Subject: RE: 2021/0314/S1 706 To 720, High Road, Goodmayes, Ilford 0680/21

Many thanks for the Stage 1. We look forward to the air quality and circular economy (para 78) comments the report states are expected.

Do you also send over TfL comments separately or energy comments also?

It appears you couldn't see the Arboricultural report and it is now available on line (not sure if you missed it)

Best regards

[REDACTED]
Regeneration & Culture
London Borough of Redbridge
11th floor, Lynton House, 255-259 High Road, Ilford, Essex IG1 1NN
Tel: [REDACTED]
[REDACTED]

Web: www.redbridge.gov.uk

Twitter: [@RedbridgeLive](#)

Facebook: www.facebook.com/redbridgelive

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From: Greater London Authority [REDACTED]
Sent: 20 April 2021 18:32
To: [REDACTED] <[\[REDACTED\]@redbridge.gov.uk](mailto:[REDACTED]@redbridge.gov.uk)>
Subject: 2021/0314/S1 706 To 720, High Road, Goodmayes, Ilford

Dear All

Please find attached the decision letter and report relating to 2021/0314/S1, 706 To 720, High Road, Goodmayes, Ilford, Development Site At Car Park And 706 To 720, High Road, Goodmayes, Ilford in Redbridge.

Regards

[REDACTED]

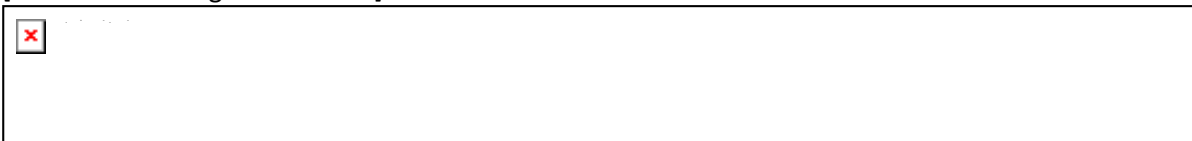
Planning Support

Greater London Authority

planningsupport@london.gov.uk

]]>

[ref:a0i4J000002gRQVQA2:ref]



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Air Quality Memo: Stage 1 consultation

2021/0314/S1

20th April 2021

706-720 High Road, Goodmayes, Ilford

London Borough of Redbridge

To (Case Officer):	[REDACTED]
From:	[REDACTED]
Applicant:	Hadley Goodmayes LLP
Air Quality Consultant:	Phlorum
Document Title:	Air Quality Assessment
Document Date:	January 2021

Proposal

Redevelopment of retail warehouse for a mixed use development comprising 7 buildings, ranging up to 20 storeys in height. Provision of flexible Class E and F1 floorspace at ground and first floor and up to 568 residential dwellings (Class C3). Provision of central public square, new areas of public realm, private landscaped amenity spaces, ancillary car parking and ancillary cycle & refuse stores. This application is a phased development for the purposes of CIL.

Policy Review

1. While the proposed development is not located within an Air Quality Focus Area, the north façade fronts High Road, which is a major through route. Table 4.6 of the air quality assessment demonstrates that levels of nitrogen dioxide exceed the annual mean air quality objective on High Road. Therefore, the methodology of the assessment is not appropriate and dispersion modelling to determine air quality conditions for future occupants of the proposed development should be carried out in order to comply with London Plan Policy SI 1 (B).
2. The proposed development is car-free and will utilise non-combustion sources for heating and hot water. It is therefore unlikely to have significant impacts on existing air quality.
3. The proposed development is air quality neutral.

Recommendations

Further information is required to ensure future residents of the proposed development are not exposed to poor air quality.

The following standard conditions are recommended:

1. Measures to mitigate impacts of dust and PM₁₀, relevant to a *medium* risk construction site, should be written into an Air Quality and Dust Management Plan (AQDMP), and implemented and maintained throughout the construction phase (London Plan Policy SI 1 (D)).
2. All on-site machinery during the construction phase must comply with the emissions standards of the London-wide NRMM Low Emission Zone (London Plan Policy SI 1 (D)).

To:

From:

Your ref: 2021/0314 (previously 5543)

Our ref: RDBG/21/11

Phone:

Date: 6 April 2021

High Road, 706 - 720, Goodmayes, LB Redbridge (Former Homebase) – TfL Stage 1 Comments

Context

The site is bounded by railway lines, a supermarket, Goodmayes Avenue and the A118 High Road (Strategic Route Network). Located 400m to the east of the site is Goodmayes Rail Station, and 620m to the west is Seven Kings. Both stations are served by TfL Rail now and in the future by the Elizabeth Line. There are five bus routes within reasonable walking distance, including one plus a night route serving the bus stops opposite and adjacent to the site. The Public Transport Access Level (PTAL) of the site ranges between 3 and 4, on a scale of 0 to 6b, where 6b is highest.

There is a marked advisory cycle route (LCN12) on High Road, however this is not continuous being broken by bus stops, parking, site accesses and crossings.

There is an emerging area of rapid growth around the above-mentioned stations, of a scale (Redbridge officers estimate up to 12,000 new homes) that is higher than has been assumed in the London Plan 2021. In the absence of a recent plan or strategy to inform the necessary transport improvements to support good growth, TfL is drawing up a study it expects Redbridge to collaborate with to identify the necessary mitigation, and how it can be delivered and funded. Mitigation of the public transport impacts of this scheme will need to be considered in this context.

Healthy Streets

TfL has launched the Healthy Streets approach, which aims to improve air quality, reduce congestion and ensure attractive places to live, work and do business. TfL expects all developments to deliver improvements which support the ten Healthy Streets indicators in line with Policy T2 of the ItPLP.

It is welcomed that the scheme is set back from the High Road to accommodate Redbridge's and TfL's aspirations for a bus lane, dedicated cycle lane and widened footway. An extensive Active Travel Zone analysis including a Pedestrian Comfort Level (PCL) Assessment has been undertaken and many mitigations identified. These should be secured as appropriate by s106 and s278 agreements. TfL seeks improvements/ connections to cycling routes and routes to public transport, additional to the aforementioned High Road aspirations and which help overcome (if feasible) north-south severance caused by the railway. Wayfinding should also be improved.

Trip Generation and Trip Distribution

A worst-case scenario has been assessed that all rail trips are from Goodmayes Station in the AM peak hour. This assumption is queried given the site is broadly halfway between Goodmayes and Seven Kings station and Goodmayes is more distant from central London. It is also not clear why there is a relatively large apportionment of vehicular trips ascribed to the commercial uses and why the cycle mode share is unambitiously low. Accordingly, the applicant should revisit and clarify the distribution of the rail trips and mode share.

Given it is car-free the development is unlikely to impact negatively on the operation of the highway network. Further consideration of the public transport impact will be needed once there has been the requested additional work undertaken on rail trips and the cumulative impact on Goodmayes station in particular considered.

Access and Car Parking

Vehicular access to the site will continue to be from the east off Goodmayes Avenue with the existing High Road access removed. This is welcome as is the removal of various car dominated uses in this location and the principle that the development will be 'car-free'. This is to be subject to a 'permit-free' legal agreement and a contribution towards the costs of extending the hours of operation of parking controls.

"Seventeen disabled person parking spaces are to be provided from the outset with 20% having active electric vehicle charging facilities and the rest passive, however TfL would prefer to see all active-provision. It is suggested that one of the BB spaces on-site could be made available to Blue badge-owning retail staff. It is accepted that given the site's location in an area with a wide range of shops and services and all public transport is step free; in the unlikely event demand for Blue Badge parking exceeds the outset provision, the Council should consider the potential for on street provision first. In addition, one of the two proposed car club spaces is to be of an accessible design and a Parking Design and Management Plan offered, these should be secured by condition.

Cycle Parking

Whilst the quantum of short and long stay cycle parking complies with Policy T5 of the London Plan, the arrangements do not appear to meet the London Cycle Design Standards (LCDS) as also required by this policy. Given the development is to be car free other than the outset provision for disabled people it is essential that cycle parking for disabled people is exemplary and at least the minimum policy requirements are met for all others. Clearer, more detailed drawings are required pre-determination and revisions are likely to be needed.

Brompton bike hire lockers, cargo bike hire and providing space for dockless e-bikes and e-scooters additional to the cycle parking are proposed and are most welcome in principle. The retention and maintenance of all cycle facilities should be appropriately secured.

Infrastructure Protection

Given the track-side location the developer should take account of policy D13 on the Agent of Change Principle which places the responsibility for mitigating impacts from existing noise and other nuisance-generating activities or uses on the proposed new noise-sensitive development. Rail infrastructure protection including a maintenance buffer strip should be secured with access made available at any time.

Delivery and Servicing, Construction

The development will provide a central collection/drop centre to service all residents to help consolidate deliveries and reduce missed collections. Clarification of the loading/unloading arrangements are required and should demonstrate achievement of vision zero principles and compatibility with the aspiration for bus and cycle lanes on High Road, improved provision elsewhere and the existing bus stops. The D&S and Construction Logistics Plans, revised as necessary, should be secured by condition.

Summary

The proposal meets the spirit of sustainable development in terms of broad transport policy however further detail and clarification is sought on a number of design matters and in regard to trip generation.

[REDACTED]

From: [REDACTED]
Sent: 14 May 2021 16:10
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: 0680/21 - 706 High Road scheme for over 560 homes in 4 to 20 storey blocks

That could be useful yes as a template and I imagine the earlier an HIA is done the better. If we could be involved in the screening and scoping phase that would be very useful I think to request the HIA covers what we think is important.

Re any fundamental issues with the scheme, no I don't think there are in terms of the site/location they are using as there are limitations to it. I think there will be challenges for living there in terms of noise and air pollution so anything that can be done by the developers to mitigate that would be beneficial. I'd also want to know that health service colleagues are ok re any potential pressures on services from an influx of people (although I'd guess it would be around 5-600 people so not too large).

Best wishes

From: [REDACTED]
Sent: 14 May 2021 15:53
To: [REDACTED]@redbridge.gov.uk>
Cc: [REDACTED]@redbridge.gov.uk>
Subject: RE: 0680/21 - 706 High Road scheme for over 560 homes in 4 to 20 storey blocks

Thanks [REDACTED]

I understand HIAs are useful also at pre app stage before the designs are fixed. In this case there has been extensive pre app work and the design is close to the final fix.

I see your comments are asking questions on air quality, carbon offsetting and softer measures.

I attach an example of a comment on another scheme from highways which states whether the scheme is acceptable or not and needs conditions. Would this be a format you would use?

The air quality issues are covered by Luke Drysdale who I have yet to get a view from. A carbon offsetting payment will be required for the scheme.

Are there fundamental issues with the scheme otherwise?

Best regards

[REDACTED]
Regeneration & Culture
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From: [REDACTED] y

Sent: 14 May 2021 15:33

To: [REDACTED] <[\[REDACTED\]@redbridge.gov.uk](mailto:[REDACTED]@redbridge.gov.uk)>

Cc: [REDACTED] <[\[REDACTED\]@redbridge.gov.uk](mailto:[REDACTED]@redbridge.gov.uk)>

Subject: RE: 0680/21 - 706 High Road scheme for over 560 homes in 4 to 20 storey blocks

Hi [REDACTED]

I've added comments to the pdf (along with a colleague) as I thought that might be the easiest way of tracking them to the relevant part of the document. I do hope they are some way helpful and for future HIA input, I'll be able to provide a more systematic way of doing it I think. Some of my comments may be easily answerable and others may, you feel, be of low relevance potentially. But I can learn as I get more used to the way the planning system works. My main queries are around the assumptions on numbers of children and the estimated provision for them, and the impact of noise and air pollution on the residents during periods of hot weather.

Anyway, hope this is helpful.

Best wishes

[REDACTED]

London Borough of Redbridge

[REDACTED]



From: [REDACTED]

Sent: 12 May 2021 16:36

To: [REDACTED] <[\[REDACTED\]@redbridge.gov.uk](mailto:[REDACTED]@redbridge.gov.uk)>

Subject: 0680/21 - 706 High Road scheme for over 560 homes in 4 to 20 storey blocks

[REDACTED] n,

Would you be able to comment on this proposal in the next week?

To see the HIA its found by searching with the above reference to this weblink

<https://planning.redbridge.gov.uk/redbridge/search-applications/> order by description and it's the 3rd page down when doing 50 records per page

Best regards

[REDACTED]

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ST/P7645
25 May 2021

Regeneration and Culture
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11th Floor Lynton House
255-259 High Road
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For the attention of

Dear

706 – 720 High Road, Goodmayes, Ilford, IG3 8RS
Response to consultee comments relating to application 0680/21

This letter is prepared on behalf of Hadley Goodmayes LLP (the applicant) and responds formally to consultee comments received in respect of the proposed mixed-use redevelopment of 706 – 720 High Road, Goodmayes, Ilford IG3 8RS ('the Site'). For clarity, this includes a response to the Greater London Authority Stage 1 report as well as the various other non-GLA items. The letter also outlines the applicant's position regarding the Heads of Terms for the S.106 and associated S.278 Agreement.

This response is supported by the following documentation:

- Summary of applicant response to GLA Stage 1 report, prepared by Rolfe Judd Planning
- Design response document, prepared by Stockwool
- Energy - Response to GLA Stage 1, prepared by Environmental Services Design
- Urban Greening Factor Plan, prepared by Fabrik
- Landscape General Arrangement Plan – Ground Level, prepared by Fabrik
- Whole Life Carbon Assessment, prepared by Adapt Sustainability
- Revised Circular Economy Statement and completed GLA compliance spreadsheet, prepared by Adapt Sustainability
- Air Quality – Response to GLA Stage 1, prepared by Phlorum
- Ground floor plan showing indicative exceedance flow rates, prepared by Waterman Environmental
- Archaeological Evaluation Summary, prepared by Savills
- Revised Floor Plans, prepared by Stockwool (please see issue sheet)
- Revised Schedule of Accommodation, prepared by Stockwool
- Daylight and Sunlight– response to BRE's assessment of Daylight, Sunlight, and Overshadowing report, prepared by GIA
- Wind Microclimate Report – response to NOVA peer review, prepared by RWDI

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- Section 106 and Section 278 Works - HoT, prepared by Rolfe Judd Planning

Whilst no amendments are proposed, updated plans and a schedule of accommodation have been submitted to correct plan labelling errors and the housing mix. In summary, the wheelchair adaptable units for the private and intermediate tenures are now labelled as 2B4P dwellings rather than 2B3P. The plans and layouts remain unchanged, but the schedule of accommodation has been updated to show the correct number of 2- and 3-bedroom affordable units. There are two more affordable rented 3-bedroom units and two less affordable rented 2-bedroom units.

Greater London Authority (GLA) - Stage 1

The GLA issued their Stage 1 report on the 19th of April (ref. GLA/2021/0314/S). The report advises LBR that the application does not yet fully comply with the London Plan and advises where additional information is required to address the comments. The areas where further information is required are set out based on broad themes, including the principle of development, housing urban design environment etc.

RJP has prepared a table that summarises the GLA's position in respect of each of these matters and outlines the applicant's response. For certain items, separate documentation has been prepared and this is referenced in the table. This includes a design document prepared by Stockwool that responds to queries relating to the podium placement between blocks, the suitability of the cycle storage and compliance with fire safety policy. Separate documentation has also been submitted to address detailed comments received in respect of the items listed below.

We consider the enclosed documentation addresses the GLA's comments in respect of compliance with the London Plan.

Circular Economy Statement

Adapt Sustainability has revised their Circular Economy Statement in line with the GLA's comments and has completed the GLA compliance spreadsheet. This information is enclosed. There are certain items that have been requested that are not available until detailed design is undertaken post approval, and we would request these details be subject of a condition(s) for discharge post approval.

Whole Life Carbon Assessment

Adapt Sustainability have produced a Whole Life Carbon Assessment to support the application, in accordance with the London Plan and associated guidance. This is enclosed.

Energy Strategy

ESD have prepared a response to the GLA Stage 1 comments relating to the schemes compliance with energy policy. It is enclosed and should be read alongside the ESD Energy Assessment submitted with the planning application.

Air Quality

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The GLA issued detailed comments relating to air quality, noting the relationship of the development with the High Road, and questioning the appropriateness of the assessment methodology. They request that dispersion modelling be undertaken, to determine air quality conditions for future occupants of the proposed development, to comply with London Plan Policy SI 1 (B).

Phlorum (the authors of the Air Quality Assessment submitted with the planning application) has prepared a response to the GLA comments explaining why the assessment methodology is appropriate and why undertaking dispersion modelling is not required. We have included below an extract from their response:

“...it is our understanding that planning application locations in exceedance of the Air Quality Standards can still be acceptable for development, providing a suitable plan can be implemented to minimise the exposure of the new occupants to existing poor air quality.

For this development, the proposal is to utilise Mechanical Ventilation with Heat Recovery (MVHR). Windows facing the sources of pollution (both road and rail) will only be openable for Part F purge ventilation. Where apartments, or land-uses introducing vulnerable communities to the area such as a child-care facility, have a dual aspect, the air inlets will be located away from the sources of pollution. Where air inlets are close to the sources of pollution, an activated carbon filter, with up to a 91% efficiency in NO2 removal, will be incorporated into the supply air valves. The client has now confirmed that ALL Ground Floor and First Floor units (irrelevant of land-use class) facing High Road will include these Air Quality filters.

Consequently, no new receptor is expected to be exposed to high pollutant concentrations, and the site is anticipated to be suitable, in air quality terms for its proposed end use, and no further assessment of site suitability is required.”

In summary, all ground and first floor units will include Air Quality Filters that remove 91% of NO2. As such, no new receptor will be exposed to high pollutant concentrations, and the site is suitable in air quality terms for its proposed end use. No further assessment of site suitability is therefore needed.

Non GLA Consultee Responses

Housing – Schedule of Accommodation

The Council's Housing Department has requested the applicant confirm how many persons can be accommodated per home, stating that ideally this should be 2 persons per habitable room to help provide family sized accommodation, especially in 2-bedroom homes. It is assumed that the Council's interest relates wholly to the affordable rented units.

The schedule of accommodation has been updated and includes a breakdown of the number of occupants per home across the different tenures. This table is shown below:

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Tenure	Studio	1B2P	2B3P	2B4P	3B4P	3B5P	Totals
Private	74	112	101	97	0	20	404
Intermediate	0	15	0	41	0	15	71
Affordable	0	18	9	40	2	24	93
							568

Only 9no. of the affordable units are 2B3P and these are the wheelchair units. There are 2no. 3B4P dwellings (affordable) but otherwise the scheme delivers 2B4P and 3B5P homes.

A number of the floor plans have been updated and the wheelchair adaptable units for the private and intermediate tenures dwellings are shown as 2B4P dwellings rather than 2B3P as the case was previously. Moreover, the schedule of accommodation has been updated to show the correct number of two bedroom and three-bedroom affordable homes. In summary, there are two additional three-bedroom affordable units and two -fewer two-bedroom affordable units than was shown previously. The plans remain correct, so do not require updating.

The housing officers' comments regarding the lack of 4-bedroom homes is noted; however, Clarion has already provided evidence to show why these do not form part of the proposal. This remains the position and we have nothing further to add.

Daylight and Sunlight

The British Research Establishment (BRE) were appointed by the Council to review the Sunlight, Daylight and Overshadowing Report prepared by GIA. GIA has produced a response to address items raised in the BRE and provide additional information/ points of clarification to assist the LPA in their decision-making process. The items relate broadly to impact on neighbouring properties and internal daylight and sunlight levels.

The full response is enclosed.

Noise

The Council's Environmental Health Officer (EHO) has provided comments relating to noise, which recommend that several conditions be secured to ensure the development is appropriate. Additional information and clarification have been requested, including whether the proposed educational use is compliant with Building Bulletin 93 (BB93) '*Acoustic Design of Schools*'.

Based on these comments, it would appear that the EHO has not reviewed the noise and vibration assessment submitted with the planning application. This was re-sent to the EHO by email on the 18th of May 2021 and should resolve the majority of the items raised. We are currently waiting for the EHO to update his comments in light of receipt of this additional information.

In terms of compliance with BB93, we would question the applicability and relevance of the guidance given the scale and nature of the use that is proposed. Indeed, whilst the Digital Music Academy falls within the educational use class (i.e., F1), it is not a school in a traditional sense and has unique requirements in terms of noise insulation.

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London Wildlife Trust

The London Wildlife Trust submitted their comments on the 18th of March, acknowledging the applicant's plans to address biodiversity implications resulting from the development, in accordance with the Redbridge Local Plan. However, they suggest the scheme could go further to enhance biodiversity by allocating part of the allotment space to biodiversity and incorporating green walls to improve connectivity with the Railside Linesides SINC.

The applicant acknowledges these comments and the potential improvements to biodiversity. However, the allotments provide valuable social benefits to the scheme and we consider that any reduction in the space allocated would negatively impact the scheme. If managed correctly, allotments provide a valuable wildlife habitat as well as growing space allowing local people to produce their own produce close to where they live. Ensuring wildlife friendly management of the allotments is something Hadley are keen to explore and can provide details on this at the post planning stage, by way of a condition.

We also consider that describing the development as harsh is misleading given that the area of permeable and green surfaces will increase from, circa 0.06% to more than 50%. The scheme also achieves an 800% Biodiversity Net Gain.

In summary, arrangements can be put in place to ensure that the management of the allotments is friendly to wildlife. However, we consider that reducing the space allocated as allotments would have negative implications to the scheme in terms of social and community benefit.

The request for green walls is noted; however, for the reasons outlined we do not consider this to be necessary. It also increases the maintenance costs post construction, which is something that would be passed onto residents and onto Clarion via the service charge. This something Hadley and Clarion wish to avoid.

London City Airport

London City Airport asked that the following condition be imposed to any grant of planning permission.

"No cranes or scaffolding shall be erected on the site unless and until construction methodology and diagrams clearly presenting the location, maximum operating height, radius and start/finish dates for the use of cranes during the Development has been submitted to and approved by the Local Planning Authority, the Local Planning Authority having consulted London City Airport."

Hadley are willing for this to be a condition on the planning permission, and recommend it forms part of the details for the construction methodology, rather than being a standalone item.

Historic England

Historic England requested that an archaeological assessment/ evaluation be submitted and assessed prior to determination. A Summary Assessment is enclosed and concludes the following:

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- *No archaeological finds or features were encountered on the site.*
- *The findings of the test pit investigation are broadly consistent with the deposit model in the desk-based assessment, which indicated an absence of Ilford Silt on the western part of the site. Whether the brickearth on the eastern part of the site represents Ilford Silt or another form of deposit is yet to be confirmed. However, previous investigations had shown the Ilford Silt at a greater thickness in the north-east of the site.*
- *As only one definite artefact was recovered from 300 litres of gravel, further investigation for Palaeolithic material from the Hackney Gravel is not recommended.*
- *the clay unit is enigmatic as it does not correspond well with the lithological descriptions of the brickearth. The clay noted by Whitaker (1889) is thought to be a better match. Preliminary analyses of material sampled during the evaluation should be undertaken for microfossil remains in the first instance.*
- *Subject to the findings of this assessment, it is recommended that a further trial pit with a surface footprint of at least 2m x 2m is sunk in the NE area of the site. Initially the pit is to be sunk to ca. 1.5m to record the clay and collect samples for microfossils (particularly pollen, diatoms, ostracods), with consideration also given to OSL and/or amino acid racemisation dating. Thereafter the trial pit should be deepened to ca. 2.5-3.0m to check for the presence of fossil material (molluscs, vertebrate bones), as recorded in sands beneath the brickearth at the London Road and Cauliflower pits, with further consideration given to the viability of OSL or other dating methods.*

It is proposed that this further survey work be carried out post planning and secured through an appropriately worded pre-commencement condition.

Historic Buildings and Conservation Advice (Essex County Council Places Services)

ECC's heritage advice outlined that they disagreed with the conclusions in the HTVIA with respect to the level of harm caused to heritage assets. ECC carried out their own assessment of significance of affected non-designated heritage assets and the perception of harm caused by the proposed development, to arrive at the conclusion that the development would result in a low level of 'less than substantial harm', which would need to be weighed up against the public benefits in accordance with paragraph 197 of the NPPF.

Savills, who produced the HTVIA, wholly disagrees with ECC's assessment. However, rather than respond on a point-by-point basis, we simply wish to reinforce the position outlined in the HTVIA, that there would be no harm caused to the significance of non-designated and designated heritage assets.

Notwithstanding this disagreement, even if the Council considered there to be a low level of 'less than substantial harm', this is outweighed significantly by the numerous public benefits of the scheme, including the delivery of high-quality market and affordable homes; the creation of a new public realm activated by new retail, office, and educational uses; and significant net gains in biodiversity (800% BNG).

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As such, the development meets the policy test in the NPPF (Paragraph 196) and is compliant with Policy HC1 of the London Plan. Any perceived harm to non designated heritage assets is offset by these public benefits and so we do not consider that contributions to help preserve and/or improve St Cedds Church are required.

Ecology Advice (Essex County Council – Place Services)

ECC's comments said that no ecology reports were available on the Councils portal, so requested that these be submitted. Preliminary Ecological Appraisal, Bat Surveys, Biodiversity Impact Assessment, and a Habitats Regulations Assessment note were all submitted with the planning applications and copies of these documents have been issued to ECC to assess the proposals.

Arboricultural Advice (Essex County Council Place Services)

ECC Place Services have objected to the proposal because, in their view, trees have not been properly considered as part of the development in terms of their value or retention. They say that whilst the concept of the development is suitable in relation to trees, further work is required to ensure the arboriculture value of the landscape is not so significantly impacted.

We have broken down the reasons into four distinct categories and provide our response to each

1. Categorisation of the trees.

"The photos provided in the report and an assessment of the tree stock on site suggests that the categories of trees on both the northern and southern boundaries could be considered more highly as category B. Their arboriculture value, their collective contribution to the visual amenity in the local landscape, as well as their potential remaining contribution on the site mean that they should be considered as material considerations as part of the planning process and therefore it would be encouraged that these categories are reviewed"

Greengage produced the Tree Survey and Arboricultural Survey submitted with the application and applied the cascade method to categorise trees on site. As such, to be considered category B2, they would need to be *"present in numbers such that they attract a higher collective rating than they might as individuals."* In this regard, whilst the location of trees along the boundaries was mentioned as a positive factor to their landscape value, they are relatively diminutive in stature and spaced apart and therefore considered to not have a *"significantly greater collective landscape value"*. We note that if the trees were retained, their contribution may be higher; however, this can also be said of the proposed compensatory planting.

For these reasons, we disagree that the trees along the boundaries should be regarded as category B trees, rather U & C as outlined in the supporting arboricultural survey and report.

2. Potential for tree retention

"As the trees discussed above are located on the boundaries of the site, their retention could be considered as part of the redevelopment. Whilst there are proposals for mitigation planting as part of the development, the instant canopy loss and loss of ecosystem services within this urbanised area are likely to be impacted."

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...Presently, only a Tree Constraints Plan has been provided as part of the arboriculture impact assessment. As a Tree Removals Plan has not been provided, the conflict between the trees and the new development cannot be fully assessed and therefore cannot be justified. With the trees and their current root protection areas, it is likely that the trees could be retained using either specialist excavation or suitable engineering methods to allow the existing trees to enhance any development on the site. Particularly with the trees on the northern boundary there is insufficient justification removal, given that the courtyard landscaped area north of the car park could be designed to incorporate these trees."

The Landscape General Arrangement Plan prepared by Fabrik (submitted with the planning application and enclosed herewith) indicates the trees proposed for removal and their relationship with the proposed development. This shows that there is not scope for the retention of trees along the northern boundary. However, significant compensatory planting is proposed and will deliver improved amenity to what there is currently.

There is scope to retain a few trees along the southern site boundary, adjacent to the railway line, however this would affect the quality of the play space and have implications for the area of land that can be allocated as allotments. On balance, it was considered that these trees offered limited amenity value and the quality of the play space and allotments should be prioritised. There is also significant compensatory planting proposed in this section of the site.

In summary, retention of trees along the northern boundary is not possible, as shown by the landscape general arrangement plan and whilst the retention of some trees is possible along the southern boundary, these provide limited amenity value and their retention would have implications for the quality of the communal spaces (i.e., allotments, play space etc). Compliance with policy LP38 is detailed below.

3. Conflict with policy LP38

"This application conflicts with Local Plan Policy LP38, which seeks to maintain and enhance canopy cover in the borough and supports development that retains trees that make a positive contribution to the local environment."

Policy LP38 of the Redbridge Local Plan states that the Council will seek to maintain tree coverage in the borough and increase provision in areas of deficiency by:

- a) *Supporting development which integrates trees and other landscape features into design and layout.*
- b) *Supporting the retention of existing trees and landscape features where these can make a positive contribution and do not adversely impact upon the deliverability of the overall development.*
- c) *Supporting development which provides appropriate new trees, shrubs and other vegetation in a manner which is integrated into the design and layout of the development, maximises their longevity and minimises maintenance.*

The second strand of the policy states that in determining which trees or other landscape features to retain in new development, key considerations are:

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- a) *Whether they are subject of any statutory protection (Tree Preservation Order or Conservation Area control).*
- b) *Their retention value according to British Standards Recommendations.*
- c) *Their contribution to local character and amenity.*
- d) *Their ecological value.*
- e) *Their role in providing screening to adjoining properties.*
- f) *Their age, condition, and suitability in the context of the proposed development.*
- g) *The impact of their retention on the deliverability of the overall development and the relative benefits of retention or removal.*
- h) *Effective measures must be employed to protect such trees and landscape features during construction phases.*

Removal of tree(s) may be permitted if:

- a) *It is necessary in the interest of good arboricultural practice; or*
- b) *The benefits of the development outweigh the tree's amenity value and broader environmental benefits*

The proposed development complies with policy LP38 as new trees, shrubs and other vegetation are integrated into the design of the development, with the public realm and landscaped areas forming an important component of the overall design. The policy is also clear that whilst trees and landscape features should be retained where possible, this should be limited to instances where they can make a positive contribution to the scheme owing to their landscape, amenity or ecological value and do not impact on deliverability. Where trees are proposed for removal, the impact on the deliverability of the development and the relative benefits of retention or removal must be considered.

In this case, whilst the trees along the northern boundary provide some landscape amenity value, they are spaced apart and diminutive in stature. Moreover, these trees cannot be retained as part of the proposed development without having significant detriment to the scheme in terms of the quantum of development and the relationship of the building with High Road. The lack of scope for retention is shown on the Landscape General Arrangement Plan.

There are also trees along the southern boundary of the site where retention is possible; however, these trees have limited amenity value and if they were retained would negatively impact on the quality and useability of the communal areas, including the play space and allotments.

Notwithstanding the loss of trees, the scheme would deliver significant compensatory planting to improve the amenity of the site. Moreover, this planting has been carefully considered to ensure the development can be delivered whilst ensuring maximum functionality of the public square, allotments, and other external areas.

For these reasons, it is considered that the proposal complies with policy LP38.

4. Tree species and diversity.

"The proposed landscaping of the site is significant and will provide a high contribution to the local environment if fully implemented. Whilst this will offset some of the loss associated with the removal of all the trees from the site, the initial impact of tree removal cannot be compensated for. Whilst there are a number of species proposed as part of this landscape plan, it would be

LB Redbridge
25 May 2021

preferable to expand this to a wider palette to ensure species diversity is promoted to ensure tree longevity on site."

The landscaping proposals include 13 different species to provide variety and longevity, whilst also being appropriate for the site in design terms. Nonetheless, we anticipate that details of hard and soft landscaping details will be subject to a condition, so we are willing to review the species selection as part of the discharge process.

Wind microclimate assessment peer review

NOVA Fluid Mechanics Ltd were appointed by LBR to assess the wind microclimate report prepared by RWDI. Several points of clarification were requested for the peer review to be finalised.

RWDI prepared a response to address the items raised, which was sent to the Council on the 26th of April. The response is enclosed for completeness but remains as re-submitted on the 26th of April.

Employment Levels

The GLA response document outlines the existing and proposed employment levels.

In summary, the proposal will lead to an increase in employment across the site. The socio-economic assessment prepared by WYG estimates that the current retail warehouse generates 27 full time employees based on a ratio of 1 employee per 90sqm. Based on the non-residential floorspace proposed, 67-89 full time employees would be generated. This is based on a ratio of 1 per 15-20sqm. The higher density reflects the fact that the uses are town centre/ retail uses.

Heads of Terms – Section 106 and Section 278 Agreements

Further to the Council's response on the S106/S278 Heads of Terms which were issued by email dated 6th of May we append a revised Heads of Terms which sets out the agreed Heads of Terms and includes suggested trigger dates. The majority of these reflect the trigger dates identified by the Council, however a number of these obligations and triggers have been modified to better reflect the appropriate timing to address Planning Obligations for a major scheme.

All trigger dates other than payment of the Council's legal fees for undertaking the engrossment of the S106 will be post-implementation as per guidance in the NPPF.

We would be willing to meet with you and relevant colleagues to further review these Heads of Terms in advance of the Planning Committee, which is now scheduled for July 2021. We consider there are no longer any further points of consideration which remain to be addressed on the application scheme but would welcome the Council's confirmation.

We trust the submitted information is satisfactory; however, please contact the undersigned or Josh Thomas or Claire Clark of RJP if you have any further queries.

Yours sincerely



LB Redbridge
25 May 2021

For and on behalf of
Rolfe Judd Planning Limited

cc: GLA
Hadley
Clarion

[REDACTED]

From: [REDACTED]
Sent: 08 April 2021 09:34
To: [REDACTED]
Cc: [REDACTED]
Subject: FW: Goodmayes Proposal

Hi [REDACTED]

[REDACTED]

I understand the scheme is going forward to planning.

As per previous comments, the response from the provider regarding provision of larger sized family accommodation appears to provide reasons why 4 beds should not be provided and does not appear to have been explored since. In addition I do not believe the provider has shared detailed regarding how many persons may be accommodated per home, ideally this should be 2 persons per habitable room to help provide family sized accommodation and applies especially in 2 bedroom homes. It would be disappointing to see 2 bed 3 persons or 3 bed 4 persons proposals.

KR

[REDACTED]

From: [REDACTED]
Sent: 15 January 2021 18:44
To: [REDACTED]@redbridge.gov.uk>
Cc: [REDACTED]
[REDACTED]@redbridge.gov.uk>
Subject: Goodmayes Proposal

Hi [REDACTED]

Thank you for passing on the communication from Rolfe Judd dated December 2020 regarding the proposed development at the Goodmayes site for over 500 homes. We welcome the opportunity to provide commentary from Housing Services and assist the delivery of new, affordable homes to help address housing need in borough.

We welcome as a base line the proposal which offers 35% affordable housing on site through both London Affordable Rent and Shared Ownership products. The communication referenced represents an explanation as to why four bedroom homes cannot be developed and we would welcome efforts to revisit this by the applicant to better address the range of housing need in borough. I can provide a more detailed response addressing the reasons cited by the applicant in the letter however felt this may not be the most productive approach in the first instance.

Happy to discuss and assist where I can.

Regards

[REDACTED]

[REDACTED]

Communities Directorate

GLA STAGE 1

GLA POST STAGE 1

Document Information

1	Date of Review	30/04/2021	Date of Applicant's Response	Please fill in.	Date of GLA Response	11.07.21	Date of Applicant's Response	Fill in
2	Document Title	Circular Economy Statement						
3	Author	ADAPT						
4	Document Date	Feb-21						

GLA Stage 1 Comments

Applicant's Stage 1 Response

GLA Post Stage 1 Response

Applicant's Post Stage 1 Response

No	Title	Description	Action Required	Description	Description	Description
Please provide a revised version of the Circular Economy Statement that incorporates the additional required information, according to the comments below.				A revised version of the CES is provided addressing the required information as per the comments below.	The updated Circular Economy statement is welcomed. Please provide a revised version of the Circular Economy Statement that incorporates the additional required information, according to the comments below.	Please respond here.
0	Overall Commitment	It is welcomed that the applicant has submitted a Circular Economy Statement in advance of the Plan being formally adopted.	Nothing further is required			
1	Description of the Development	The applicant has provided description of the development but has not provided the proposed gross internal floor area (GIA).	Provide the proposed GIA.	GIA included within Section 2.1 of CES.	The additional information is welcomed. Nothing further is required.	
2	Strategic Approach	The applicant has summarised the Strategic Approach to the project in Table 1 and has provided a supporting narrative in the statement.	Nothing further is required			
3	Key commitments	The applicant has summarised the Key Circular Economy Commitments in Table 2 and has provided a supporting narrative in the Statement.	Nothing further is required			
3	Key commitments	Many of the commitments are considered standard practice. The guidance states that there should be a focus on "commitments that go above and beyond standard practice".	The applicant should consider key circular economy commitments that go beyond standard practice.	Further detail has been added to Table 3 of the CES to demonstrate commitments that "go beyond standard practice".	The additional information is welcomed. Nothing further is required.	
4	Bill of Materials	The applicant has not provided a Bill of Materials including kg/m ² for the proposed new development and has not confirmed that reused or recycled content will be 20 per cent.	The Bill of Materials should be provided as per the GLA's Guidance.	Bill of materials template has been provided in Appendix 1. At this stage of the material quantities (kg) have not been calculated. These will be provided and the CES updated in the next stage of design. Refer to Table 4 and Section 4.4 for confirmation of the target to specify materials with 20% reused or recycled content.	The additional information is welcomed. Other applicants provide the bill of materials at this stage. Please provide estimates of the material quantities and intensity.	Please respond here.
5	Recycling and Waste Reporting	The applicant has partially completed the Recycling and Waste Reporting table and has not committed to achieving the policy target of reusing/ recycling/ recovering 95 per cent of demolition waste.	Add the estimates of excavation, demolition, construction and municipal waste as per GLA guidance. Commit to achieving the policy target of reusing/ recycling/ recovering 95 per cent of demolition waste.	Excavation and demolition waste estimates (tonnes) are not available at this stage and will be provided at Stage 3. Estimates of construction and municipal waste are provided within Table 4 of the CES. Refer to Table 4 and Page 18 of the CES for the commitment to achieve the London policy target of reusing / recycling / recovering 95% of demolition waste.	The additional information is welcomed. - Table 4 provides estimates of the excavation waste. Please provide the estimate in t/m ² . - Other applicants provide the estimate of demolition waste at this stage. Please provide the estimate demolition waste (t/m ²). - Please provide the municipal waste in t/annum as per the GLA guidance.	Please respond here.
5	Recycling and Waste Reporting	The applicant has not provided a notification of the likely destination of all waste streams (beyond the Materials Recycling Facility). The applicant has not provided a written confirmation that the destination landfill(s) has/have the capacity to receive waste.	Provide a notification of the likely destination of all waste streams (beyond the Materials Recycling Facility). Provide a written confirmation that the destination landfill(s) has/ have the capacity to receive waste.	This has not been determined at Stage 2. On completion of the Resource Management Plan (RMP) at Stage 3, there will be further information available relating to anticipated waste streams and volumes. At this stage, the applicant will identify liaison with waste destination to confirm capacity.	The additional information is welcomed. This will be secured through Planning Condition. Nothing further is required.	
5	Recycling and Waste Reporting	The applicant has not undertaken a Pre-Demolition Audit to identify components of the building that can be retained / reused.	Undertake an independent Pre-Demolition Audit.	To date the Applicant has commissioned a Demolition Management Plan. The purpose of this plan to provide the foundation principles for the method of demolition in accordance with current industry best practice and standards. The Applicant will commission a Pre-Demolition Audit at Stage 3 / on appointment of a demolition contractor and incorporate the findings within the CES. The production of a Pre-Demolition Audit has been added as a commitment in Table 3 of the CES.	The additional information is welcomed. However, an independent Pre-Demolition audit should be undertaken at this stage. Please undertake an independent Pre- Demolition Audit.	Please respond here.
6	Operational waste	The Applicant has demonstrated how much operational waste the proposal is expected to generate.	Nothing further is required			
6	Operational waste	The Applicant has not stated that waste will be managed in accordance with the waste hierarchy.	Include commitment to waste hierarchy for operational waste.	Refer to Table 1, Table 3, Table 4 and page 20 of the CES.	The additional information is welcomed. Nothing further is required.	
6	Operational waste	The development is designed with adequate, flexible, and easily accessible storage space.	Nothing further is required			
6	Operational waste	The development support the separate collection of dry recyclables (at least card, paper, mixed plastics, metals, glass).	Nothing further is required			
6	Operational waste	The development not support the separate collection of food waste.	Provide evidence to demonstrate separate collection of food waste for residential & commercial units, including bin location, quantity and sizes	Refer to Page 20 of the CES and Appendix 2. The bin stores provide provision for general refuse, recycling and composting bins for food waste.	The additional information is welcomed. Nothing further is required.	
6	Operational waste	The Applicant does not show how [operational] performance will be monitored and reported.	Inclusion in Strategy.	Refer to Page 20 and Section 4.17 of the CES for information on the proposed monitoring and reporting of operational waste.	The additional information is welcomed. Nothing further is required.	
6	Operational waste	The Applicant has not included a commitment to meet or exceed the municipal waste recycling target of 65 per cent by 2030.	Inclusion in Strategy.	This commitment is stated in Table 4: Recycling and Waste Reporting and on Page 20 of the CES.	The additional information is welcomed. Nothing further is required.	
6	Operational waste	The applicant has not explored measures such as consolidated, smart logistics and community-led waste minimisation schemes.	Inclusion in Strategy.	Refer to Table 3 and Page 20 of the CES. Further opportunities will be considered during Stage 3.	The additional information is welcomed. Nothing further is required.	
7	Plans for implementation	The applicant has partially provided Plans for Implementation including specific plans for achieving short- and medium-term targets and commitments; and the programme / method for achieving longer-term targets.	Provide Plans for Implementation in order to achieve the policy targets and key commitments, as per the GLA Guidance.	Additional information on implementation plans are provided in Section 4.7 of the CES.	The additional information is welcomed. Nothing further is required.	
8	End-of-life strategy	The applicant has provided a brief End-of-Life Strategy for how the building materials, components and products will be disassembled and reused at the end of their useful life.	Nothing further is required			
9	Appendices	The applicant has provided appendices or as a cross reference to some of the supporting information. The applicant has not provided the following: • Independent pre-demolition audit • Site Waste / Resource Management Plan • Municipal / Operational Waste Management Plan • Cut and fill calculations and/or Excavated - Materials Options Assessment • Building weight calculation (load take-down) • Materials Options Assessment • Scenario modelling demonstrating adaptability • Circular Economy workshop/ meeting notes • Lean design options appraisal • Reused or recycled content calculations	Provide an appendix or as a cross reference the following required supporting information: • Independent pre-demolition audit • Site Waste / Resource Management Plan • Municipal / Operational Waste Management Plan • Cut and fill calculations and/or Excavated - Materials Options Assessment • Building weight calculation (load take-down) • Scenario modelling demonstrating adaptability • Circular Economy workshop/ meeting notes • Lean design options appraisal • Reused or recycled content calculations	• Independent pre-demolition audit: Applicant will commission a Pre-Demolition Audit during Stage 3 / on appointment of a demolition contractor. • Site Waste / Resource Management Plan: Applicant will produce a BREEAM compliant Resource Management Plan during Stage 3. • Municipal / Operational Waste Management Plan: Provided in Appendices of CES • Cut and fill calculations and/or Excavated - Materials Options Assessment: Refer to Appendix 2 of the CES - General approach to cut and fill has been considered at Stage 2 and included within the Structural Engineers Site Investigation Interpretive Report. Further cut and fill calculations will be undertaken when architect and landscape levels are fixed. • Building weight calculation (load take-down): Applicant will commission a Pre-Demolition Audit during Stage 3 • Scenario modelling demonstrating adaptability: Adaptability considered within BREEAM assessment and addressed within Table 3 of the CES. • Circular Economy workshop/ meeting notes: Provided in Appendices of CES. • Lean design options appraisal: Addressed within Table 3 of the CES. • Reused or recycled content calculations: Addressed within Table of the CES. Further calculations will be undertaken in Stage 3 as the specification of materials	The additional information is welcomed. However, an independent Pre-Demolition audit should be undertaken at this stage. Please undertake an independent Pre- Demolition Audit and provide it as an appendix..	Please respond here.
10	Post Completion Report	The applicant has agreed to submit a Post Completion Report to the relevant local authority and the GLA at ce&wastestatement@london.gov.uk . It is required that the Post Completion Report sets out the predicted and actual performance against all numerical targets, and provides updated versions of Tables 1 and 2, the Recycling and Waste Reporting form and Bill of Materials.	Nothing further is required			

Construction Site Discharge:

Location..Development site at car park and 706 to 720 High Road, Goodmayes
Ilford.....Date..15/03/2021..Ref..0680/21

1. Construction Traffic routes and traffic management measures

Nearest school – N/a

Possible traffic hold ups whilst construction vehicles entering/leaving site.

2. Construction traffic washing

Cleaning station to be sited in service road at egress from site including wheel washing.

3. Public Highway Cleansing

Site operatives to clean h/way & f/way as necessary and before end of works each day.

4. Dust & Noise Suppression

Dust suppression sheeting will be required .

5. Hours of Work

0830 -1700 Monday to Friday.

0900 – 1300 Saturday (not planned but may be required).

6. Construction Waste material

Extraction within the grounds of the site.

7. Locations of Plant/Machinery/Waste/Materials

Stored within site

8. Other Comments

Commercial area.

Discharge carried out without site meeting

I am satisfied that this site can be discharged, with these conditions laid out above.

PLANNING REF 0680/21

Location: Development Site at Car Park And 706 To 720, High Road, Goodmayes

Domestic Waste

Calculations show that the minimum amount of 1100 Litre Eurobins required to contain household waste for 590 residential units (As per the refuse provision schedule in the D & A statement) would be 109 in number with 20 X 1100 Litre Eurobins for Recycling which are split into pairs of bins (1 for paper and card and the other for mixed recycling). Please see below for breakdown. Refuse containers would need to be provided by the agent/developer of the site. The use of any area of land for storing waste containers assumes that you have permission/right to do so and from the waste management point of view, any comments on how the waste may be handled assumes that such permission/right exists.

Please note the refuse vehicle dimensions below and the required width and height clearance for the RV to access the site for collections.

Block A – 121 Flats

Calculations show that the minimum amount of 1100 Litre Eurobins required to contain household waste for 121 Apartments/Flats would be 22 in number, recycling for this block would require 4 X 1100 Litre Eurobins and would be in addition to the refuse containers.

Block B – 145 Flats

Calculations show that the minimum amount of 1100 Litre Eurobins required to contain household waste for 145 Apartments/Flats would be 26 in number, recycling for this block would require 6 X 1100 Litre Eurobins and would be in addition to the refuse containers.

Block C – 135 Flats

Calculations show that the minimum amount of 1100 Litre Eurobins required to contain household waste for 135 Apartments/Flats would be 25 in number, recycling for this block would require 6 X 1100 Litre Eurobins and would be in addition to the refuse containers.

Block D – 99 Flats

Calculations show that the minimum amount of 1100 Litre Eurobins required to contain household waste for 99 Apartments/Flats would be 18 in number, recycling for this block would require 4 X 1100 Litre Eurobins and would be in addition to the refuse containers.

Block E1 – 30 Flats

Calculations show that the minimum amount of 1100 Litre Eurobins required to contain household waste for 30 Apartments/Flats would be 6 in number, recycling for this block would require 2 X 1100 Litre Eurobins and would be in addition to the refuse containers.

Block E2 – 30 Flats

Calculations show that the minimum amount of 1100 Litre Eurobins required to contain household waste for 30 Apartments/Flats would be 6 in number, recycling for this block would require 2 X 1100 Litre Eurobins and would be in addition to the refuse containers.

Block E3 – 30 Flats

Calculations show that the minimum amount of 1100 Litre Eurobins required to contain household waste for 30 Apartments/Flats would be 6 in number, recycling for this block would require 2 X 1100 Litre Eurobins and would be in addition to the refuse containers.

Refuse containers would need to be provided by the agent/developer of the site. The use of any area of land for storing waste containers assumes that you have permission/right to do so

and from the waste management point of view, any comments on how the waste may be handled assumes that such permission/right exists.

Container sizes are listed below

Further consideration should also be given for the accommodation of additional bins in case of an increase in the volume of refuse and recycling. This will also provide extra capacity for storage of bulky items awaiting collection.

The London Borough of Redbridge refuse collection service currently uses Steel Refuse containers/Eurobins for waste collections. All containers are required to be compatible with the bin lifting mechanism of the Councils Refuse fleet. All Refuse containers would need to be provided by the builder/managing agent and be to the authorities current specification. If plastic Eurobins are provided for refuse collections, the Authority will not be held responsible for damage to any such containers.

Commercial Waste

The businesses at the proposed site are required to have all commercial waste produced at their premises removed by a registered waste carrier. This is a paid for service and they would need to enter in to a contract with the disposal company.

If the proposed businesses are to dispose of food waste or are to be A3/A5 use. I recommend that all waste be contained within a commercial container (360/660/1100 Litre Eurobin, dependant on the amount of waste produced weekly). This container is required to be sited within the boundary of the property and not on the public highway or in any other public place.

General

I recommend that commercial and residential waste storage areas are kept separated from each other to prevent offences under the Environmental Protection Act 1990.

The London Borough of Redbridge refuse collection service currently uses Steel Refuse containers/Eurobins for waste collections. All containers are required to be compatible with the bin lifting mechanism of the Councils Refuse fleet. All Refuse containers would need to be provided by the builder/managing agent and be to the Authorities current specification. If plastic Eurobins are provided for refuse collections, the Authority will not be held responsible for damage to any such containers.

Please note that the Authority will require 5 keys/fobs for access to the site and/or bin stores before any collections are commenced.

Paths from bins stores should be constructed to a smooth finish and level unless the gradient falls away from the bin chamber, if so this should not exceed 1 in 12, Paths and door openings are required to be a minimum width of 1.8m. Dropped kerbs to be provided as required. Distance to pull bins to the Refuse Vehicle that is parked within the boundary of the site should not exceed 20 metres and should be as near as possible to where the vehicle is parked. If the collection vehicle is to stop on the highway for collections then the number of bins should not exceed 2 in number and the distance to pull bins should not exceed 10 metres.

Turning circles to accommodate a RCV with a turning circle of 17 Meters or a hammer head of 6 Meters will need to be provided in some cases to ensure that refuse vehicles can drive in & out of the site.

Sizes of 1100 Euros in mm's;

Height 1380 Height with lid fully open just over 2.3 metres

Width 1270

Depth 1000

Sizes of Refuse Vehicles, maximum dimensions;

Height 4.00 metres Turning circle 16.5 metres

Length 10.01 metres

Width 2.86 metres

The weight of a laden refuse vehicle of the type used is 27 tonnes. Covers over manholes, gully gratings and the like shall, in private roads which the refuse vehicle is required to use, be of the heavy-duty highway type. **Any arch, under which the refuse vehicle must pass must allow a minimum 4 metres clearance from high point of camber or cross fall. Further to this a minimum access width of 4.5 meters in width must be provided.**

The Councils Refuse Dept. will need to be informed in advance of the development being completed to ensure that refuse collections can be commenced when the estate becomes occupied. This will also ensure the correct sighting of containers for refuse and recycling collection. Please contact Waste Collection team at Ley Street Depot, Ley Street, Ilford, Essex IG2 7QZ for the relevant officer.



HADLEY GOODMAYES LLP

GOODMAYES HOMEBASE SITE GLA STAGE 1 RESPONSE

STOCKWOOL - MAY 2021

GOODMAYES HOMEBASE SITE

GLA STAGE 1 RESPONSE

1.0 INTRODUCTION

1.1 GLA RESPONSE DOCUMENT

2.0 CYCLE STRATEGY

2.1 CYCLE PARKING STRATEGY

2.2 GROUND FLOOR LAYOUT

2.3 FIRST FLOOR LAYOUT

2.4 CYCLE RACK TYPE A

2.5 CYCLE RACK TYPE B

2.6 CYCLE RACK TYPE D AND E

2.7 BLOCK A

2.8 BLOCK B

2.9 BLOCK C

2.10 BLOCK D

2.11 BLOCK E1 AND E2

2.12 BLOCK E1 AND E3

2.13 SUMMARY

3.0 PODIUM

3.1 PODIUM LOCATION

3.2 TOWNSCAPE PRINCIPLES

3.3 BLOCK A AND B PUBLIC REALM

3.4 SUMMARY

4.0 FIRE SAFETY

4.1 FIRE SAFETY RESPONSE

Ref: 3514 © Stockwool

ARCHITECTURE &
URBANISM

**stock
wool**

PLANNING
CONSULTANT

Rolfe Judd
Planning

TOWNSCAPE
CONSULTANT

savills

MEP &
SUSTAINABILITY

 **Environmental
Services
Design**

HIGHWAYS

**Robert
West**

DAYLIGHT, SUNLIGHT &
OVERSHADOWING

gia

LANDSCAPE
ARCHITECTS

fabrik

SUSTAINABILITY

 **ADAPT**
SUSTAINABILITY CONSULTING

MICRO-CLIMATE

BW

1.0

1.0 INTRODUCTION

1.1 GLA RESPONSE DOCUMENT

GLA STAGE 1 REPORT - APPLICANT RESPONSE

This document provides an applicant response to the below queries as set out in the GLA Stage 1 Report for the Former Homebase Retail Warehouse, 706-720 High Road, Goodmayes, IG3.

Clarifications and additional information is supplied for each of the below points.

between the public square and the railway edge. This would also allow for play space currently proposed along the western edge, to be accommodated upon the podium deck.

The applicant has not responded to or tested options for, including a second podium following GLA pre-application advice. Considering the high density of development proposed, residential quality must achieve the best possible standard. GLA officers are of the view that the addition of a podium is necessary to make the scheme acceptable in design terms.

CYCLE PARKING - GLA COMMENT

The quantum of long and short-stay cycle parking has been provided in compliance with Policy T5 of the London Plan, however, does not meet the London Cycle Design Standards also required by the policy. Given the development is to be car free other than the outset provision for disabled people, it is essential that cycle parking for disabled people is exemplary and at least the minimum policy requirements are met for all others. Clearer, more detailed drawings are required pre-determination and revisions are likely to be needed.

FIRE SAFETY - GLA COMMENT

A fire statement has been submitted as required by Policy D12 of the London Plan. The applicant should confirm that the proposed development would also comply with the requirements of Policy D5 of the London Plan to provide a suitably sized evacuation lift to allow emergency evacuation for people who require level access.

LAYOUT - GLA COMMENT

The eastern portion of the site has been revised since GLA officers saw the scheme at pre-application stage which improves the quality of the public realm around the temple building and is welcomed. The general layout approach is supported.

Concern was raised in the pre-application meeting in relation to the amenity space between blocks A and B; this remains a concern. The scale of the blocks is such, that it is likely to create an imposing effect on this space, severely limiting east/west sunlight. There is also a large proportion of refuse frontage onto this space.

The provision of a podium to link blocks A and B (as has been proposed between blocks B and C) would allow for refuse and car parking to be contained and raise the amenity space from ground level, providing more definition between the public and private realm.

Alternatively, the applicant could consider the relocation of the proposed podium between blocks B and C, to between blocks A and B which would open space



HADLEY GOODMAYES LLP

2.0

2.0 CYCLE STRATEGY

2.1 CYCLE PARKING STRATEGY

CYCLE LOCATION & ACCESS STRATEGY

The Applicant’s commitment to enabling a modal shift towards cycling and other sustainable forms of transport is visible throughout the scheme and this approach is also clearly visible in the below strategy.

Cycle storage in line with the draft London Plan has been provided across the scheme with each blocks required cycle parking located at its base for easy, secure access by residents.

The proposed layout allows for 20% of the cycle spaces to be larger single cycle spaces or Sheffield type stands as agreed with officers at Redbridge.

Within Blocks A, B and C there is proposed cycle storage located at 1s floor level. In these locations a cycle lift is proposed that has separate external access at ground level. The lifts are designed to maximise ease of use by entering and exiting in the same direction.

Short stay cycles are provided at a ratio of 1 space per 40 units = 14 and are located within the landscape as Sheffield stands.

The proposal utilises four types of cycle stands as indicated below.

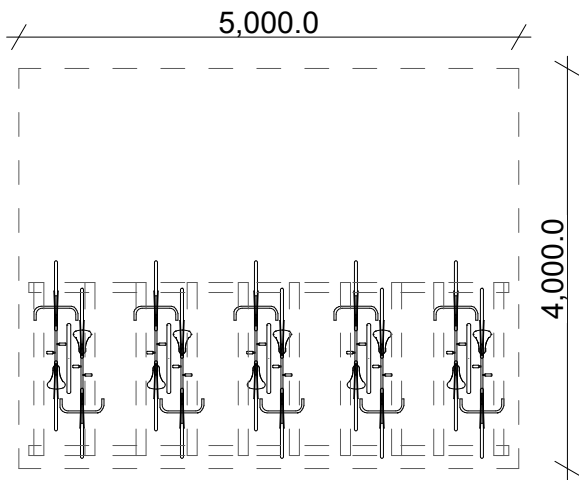


PRECEDENT OF CYCLES STORE TO FEEL INVITING AND SECURE.

Block	Total Cycles REQUIRED
Block A	219
Block B	244
Block C	244
Block D	112
Block E1	57
Block E2	57
Block E3	57
Residential required Long Stay	990
Residential required Short Stay	14
Total Residential Cycle	1004

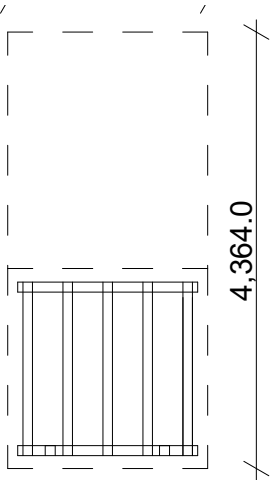
Josta stacker 10 cyles per stacker	Sheffield Stands 2 cyles per stand	Larger Spaces 1 cyles per space	Total Provision	Number of large cycles	% of larger cycles
176	32	12	220	44	20%
196	38	12	246	50	20%
196	38	12	246	50	20%
90	18	4	112	22	20%
46	10	3	59	13	22%
46	10	3	59	13	22%
46	8	4	58	12	21%
796	154	50	1000	204	20%
			14		
796	154	50	1014		

RESIDENTIAL CYCLE PROVISION SCHEDULE



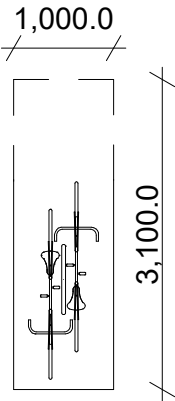
Easi Riser 2-Tier cycle system
Provision of 5 Sheffield Stands and 10 upper tier cycle storage. Total of 20 cycles. (10 x Sheffield & 10 x 2 tier)

TYPE A



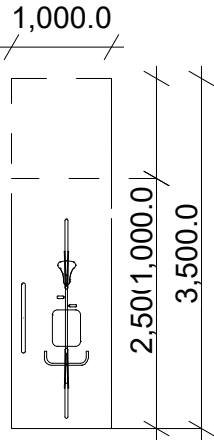
2-tier cycle rack
Provision for 10 cycles

TYPE B



Sheffield stand cycle space
Provision for 2 cycles

TYPE C



Cargo cycle space
Provision for 1 cycle

TYPE D

RESIDENTIAL CYCLE TYPES OF STANDS PROPOSED ACROSS DEVELOPMENT

2.0 CYCLE STRATEGY

2.2 GROUND FLOOR LAYOUT



GROUND FLOOR LEVEL CYCLE STORAGE LOCATIONS

2.0 CYCLE STRATEGY

2.3 FIRST FLOOR LAYOUT



FIRST FLOOR LEVEL CYCLE STORAGE LOCATIONS

2.0 CYCLE STRATEGY

2.4 CYCLE RACK TYPE A

CYCLE STAND PROVISION AND TYPES

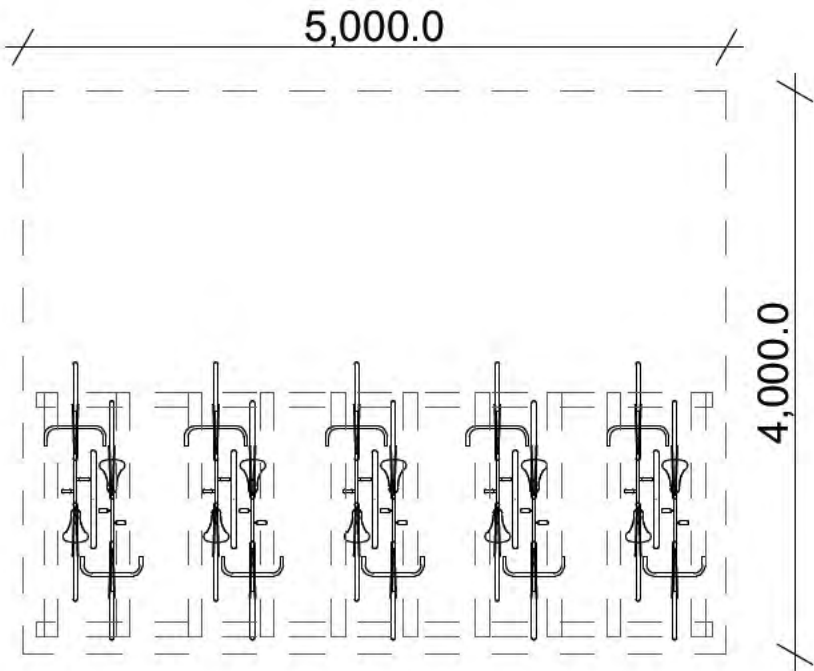
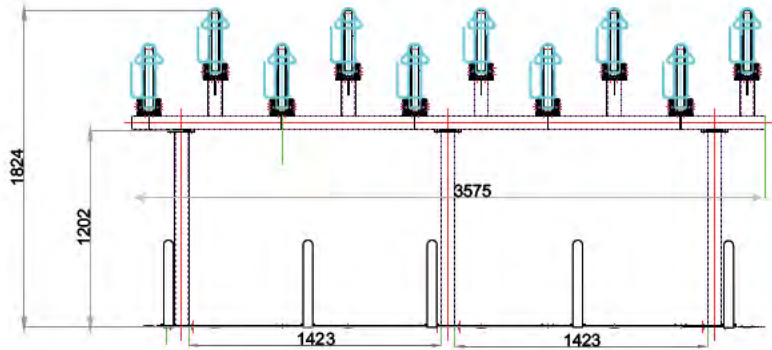
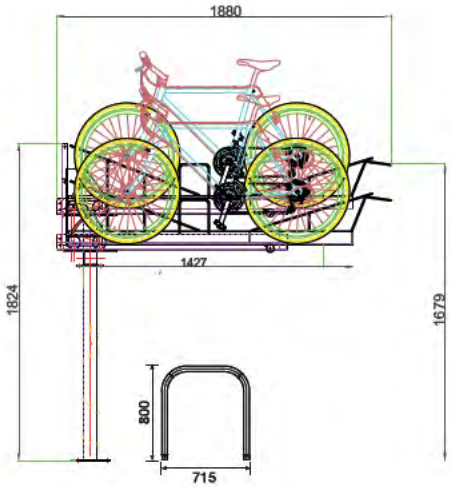
As listed above the scheme provides cycle parking across a range of different cycle storage types. The adjacent stand utilises five Sheffield type stands with a gas strut mechanism providing an upper tier of cycle storage. The proposed use of this stand type has been approved during the consultation period with officers at Redbridge.

The overall provision of this type of cycle stand is kept to a minimum across the scheme.

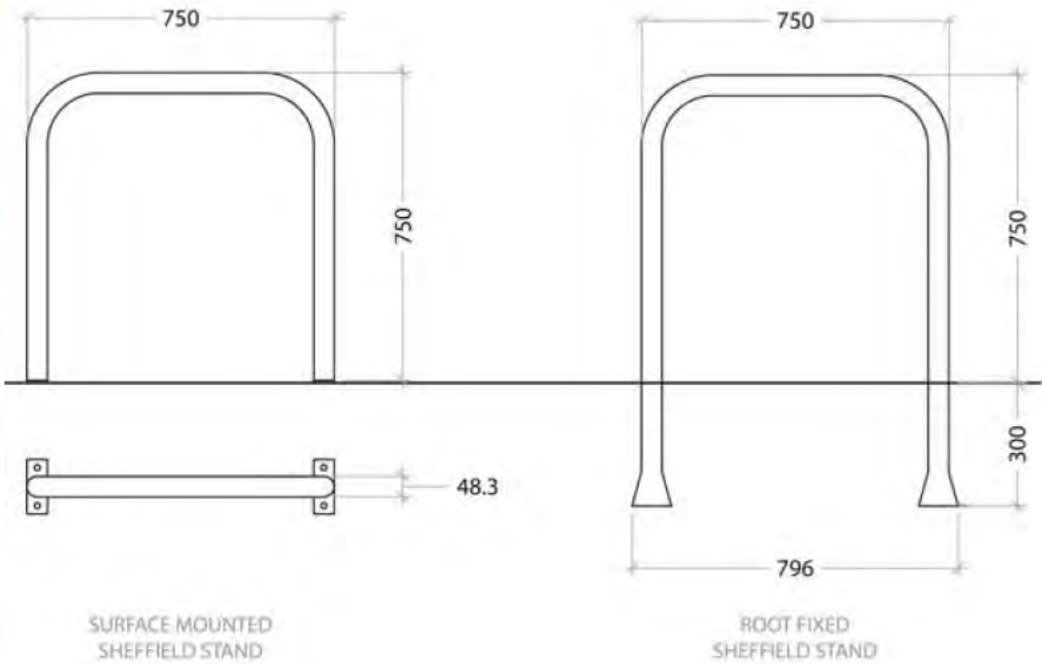
Easi-Riser 2-Tier Cycle Storage System, with gas strut mechanism BXMW/EASI-RISER

- Construction:
 - Height: 1824mm from FFL to highest point
 - Accommodates various number of cycles (ech “4 cycle spaces” consists of 2 Nr. upper tier troughs and 1 Nr. Sheffield hoop) Upper tier fitted with high/low retractable troughs (fitted with gas strut to assist lifting/lowering) that can be lowered for cycle stowing
 - Width: 3679mm (including the ‘loading’ bike length)
 - Operating Head Clearance: 2455mm minimum (subject to cycle type)
 - Operating dimensions are dependent on bike design and do not consider any add-ons (e.g. child’s seat, “cow horn” handlebars, larger tyres etc.).
 - Frame Work Finish: Galvanized
 - Lower Cycle Rack Finish: Galvanized
 - Upper Troughs/Runners Finish: Galvanized
- (N.B. 20kg weight limit).

Bespoke versions for reduced height or length (condensed centres) is available upon request (EPOA).



Easi-Riser 2-Tier cycle system
Provision of 5 Sheffield Stands and 10 upper tier cycle storage. Total of 20 cycles. (10 x Sheffield & 10 x 2 tier)



Josta® 2-tier High Capacity Racks

2.0 CYCLE STRATEGY

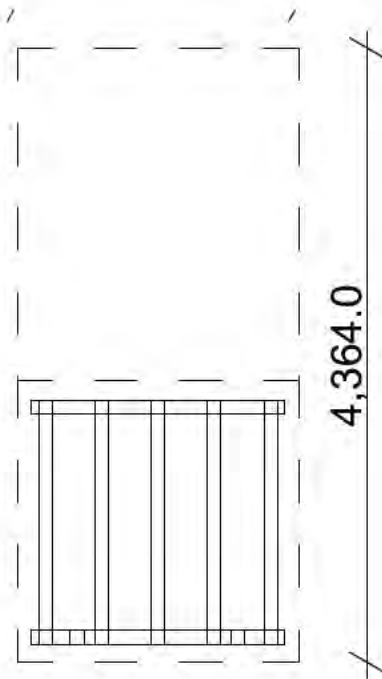
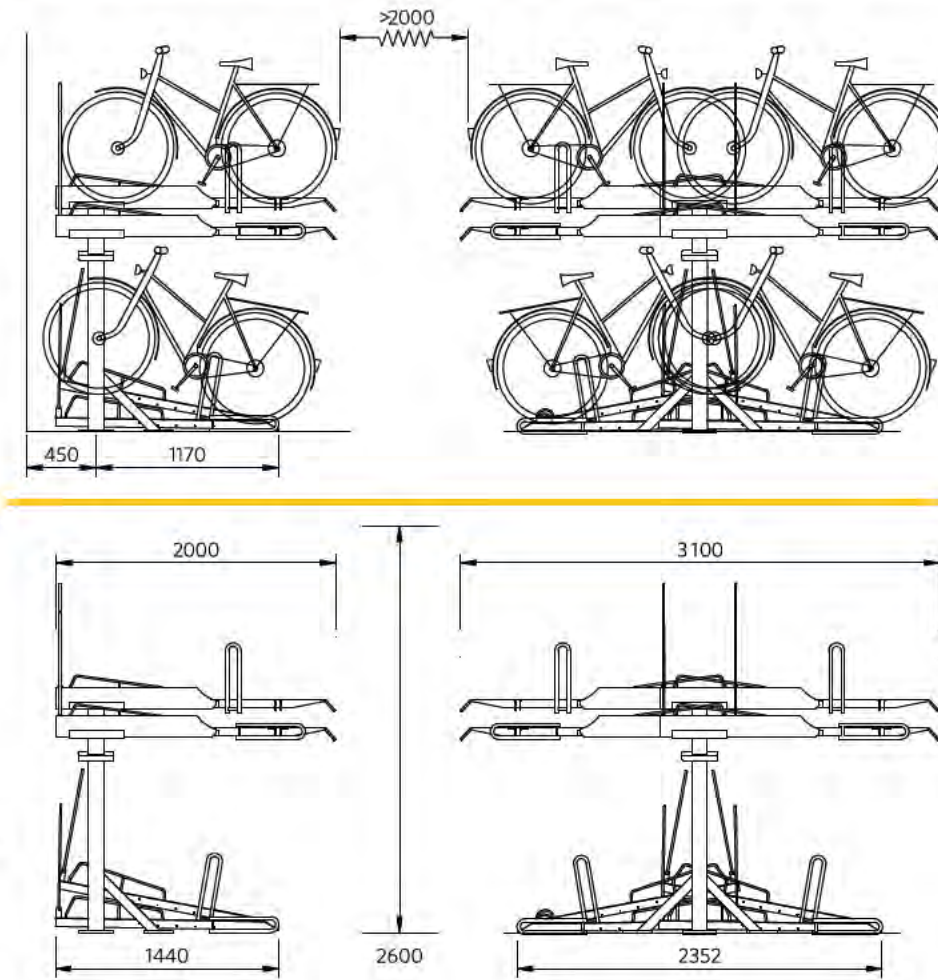
2.5 CYCLE RACK TYPE B

CYCLE STAND PROVISION AND TYPES

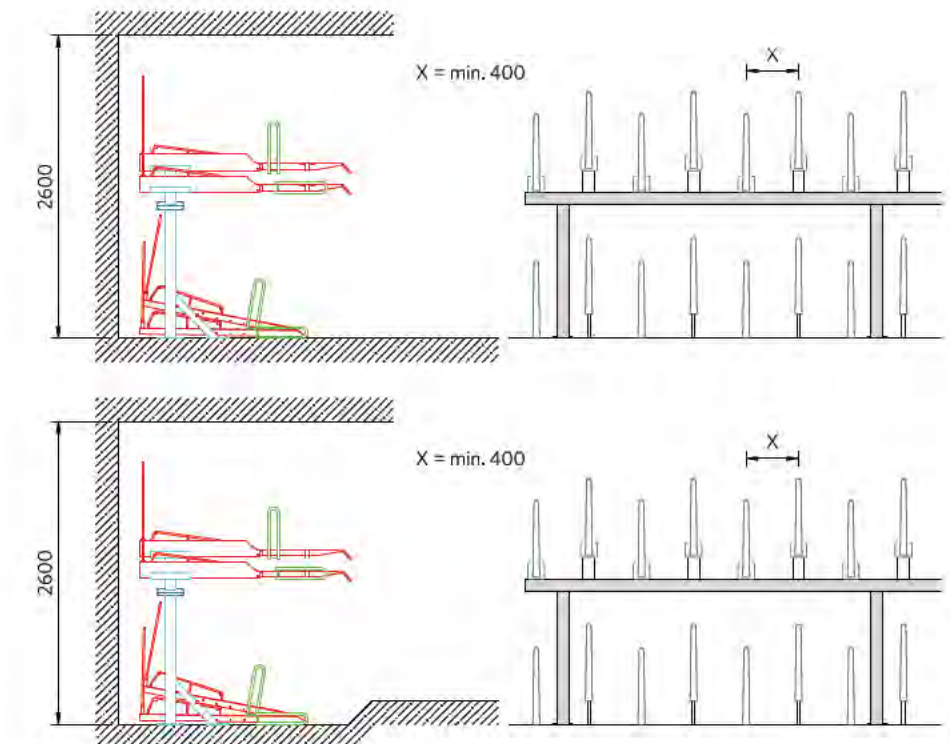
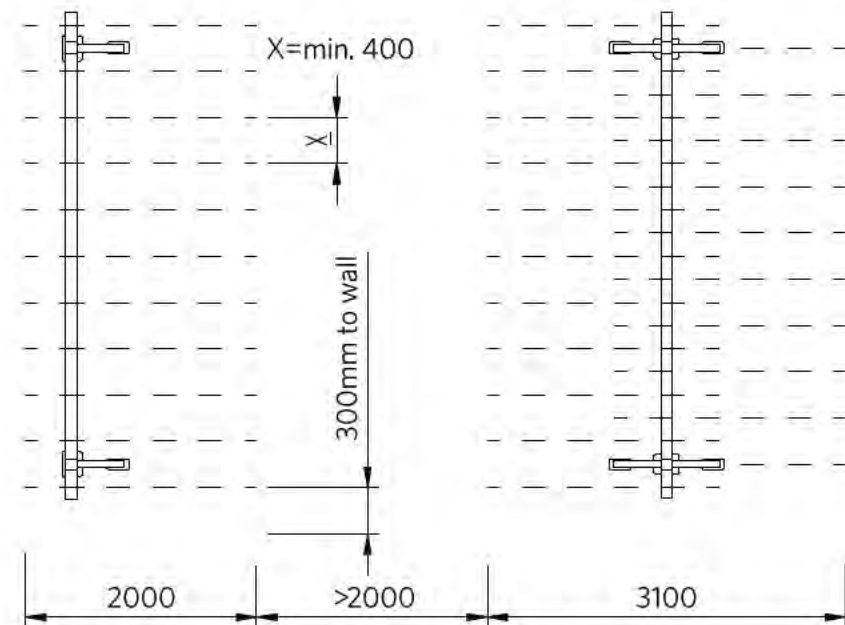
The scheme provides 80% of its cycle parking in the form of double stacking type parking stands as indicated on the adjacent page. The operational allowances of this stand type exceed the minimum recommended by the manufactures.

Site Requirements

- A minimum of 2600mm of clear headroom is required for maximum capacity.
- Leave 300mm to any adjoining side wall to give space for the handlebars.
- The racks are then spaced at a minimum of 400mm centres. We have found 450mm to be a good spacing, giving capacity as well as ensuring ease of use.
- Please allow 2000mm for the rack itself and another 2000mm in front for loading the bike. It is possible to allow 1700mm for loading but we strongly recommend at least 2000mm for optimal operation
- The racks can also be installed from a central spine. For this option, please leave 2000mm for access on both sides. The 2-sided unit is then 3100mm wide.
- Racks can also be installed at a 45 or 55 degree angle to minimise space



2-tier cycle rack
Provision for 10
cycles



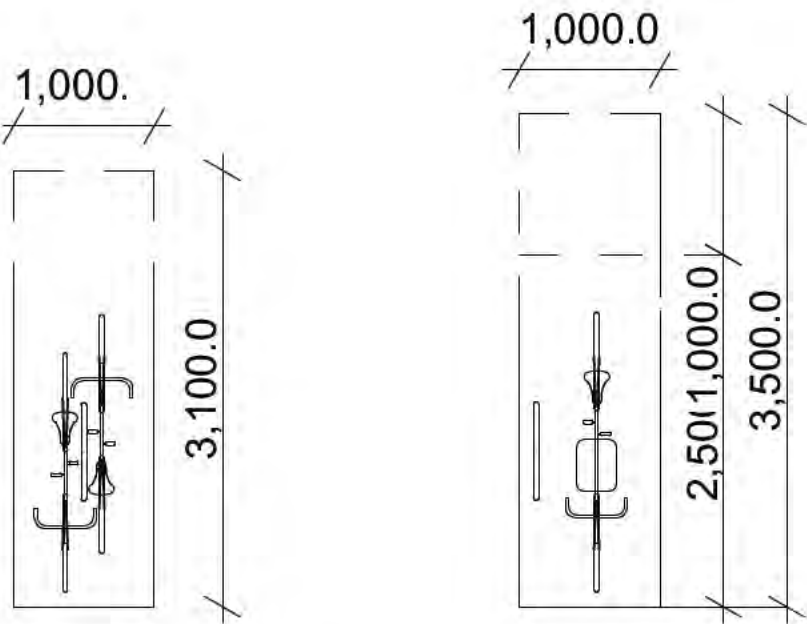
2.0 CYCLE STRATEGY

2.6 CYCLE RACK TYPE D AND E

CYCLE STAND PROVISION AND TYPES

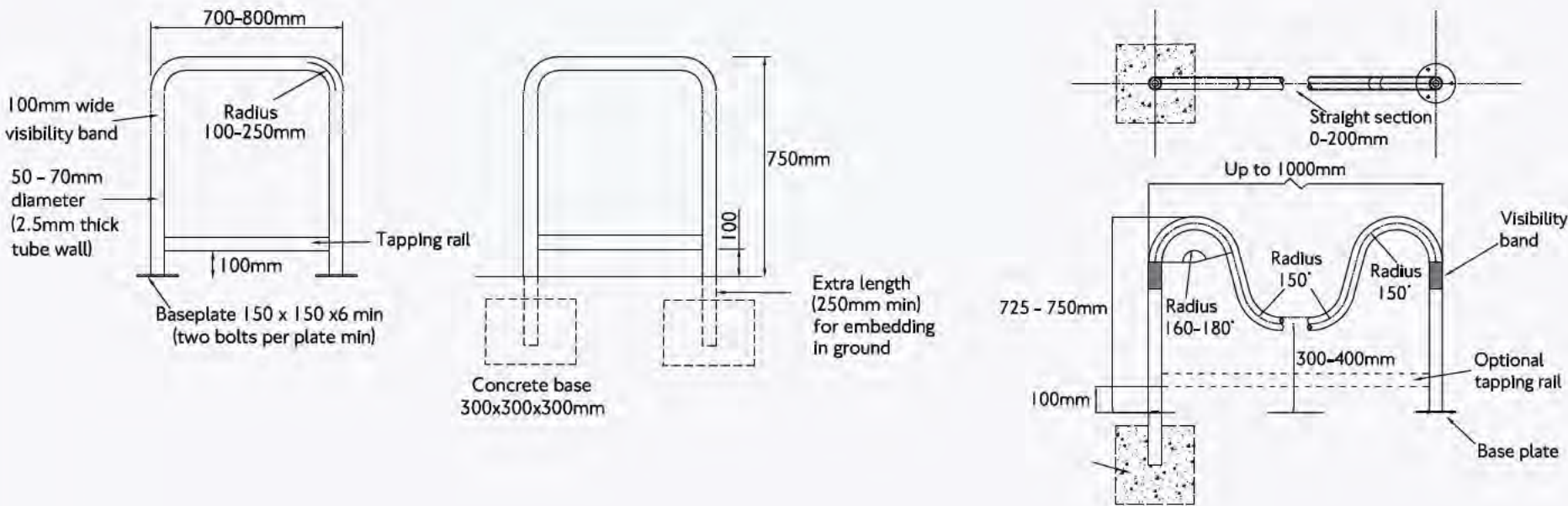
The remaining 20% of cycle parking provision is made up of approximately 15% Sheffield type cycle stands with secure locking and allows for 2 cycles spaces to be parked to each stand.

The remaining 5% are provided as single stands as dimensioned below that allow for larger, cargo style cycle parking. The location or provision of a locking loop is indicative for these spaces. There is also an increased allowance for turning space into these types of spaces.



Sheffield stand
cycle space
Provision for 2
cycles

Cargo cycle
space
Provision for 1
cycle



Standard details and dimensions for Sheffield stand (left) and M-profile stand (right)

2.0 CYCLE STRATEGY

2.7 BLOCK A

CYCLE STAND LAYOUT WITHIN BLOCKS

The adjacent plan indicates each type of cycle stands location within the cycle store with layout dimensions.




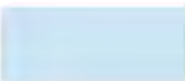
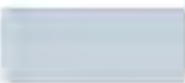
The below tables sets out the quantum of each type required within each block.

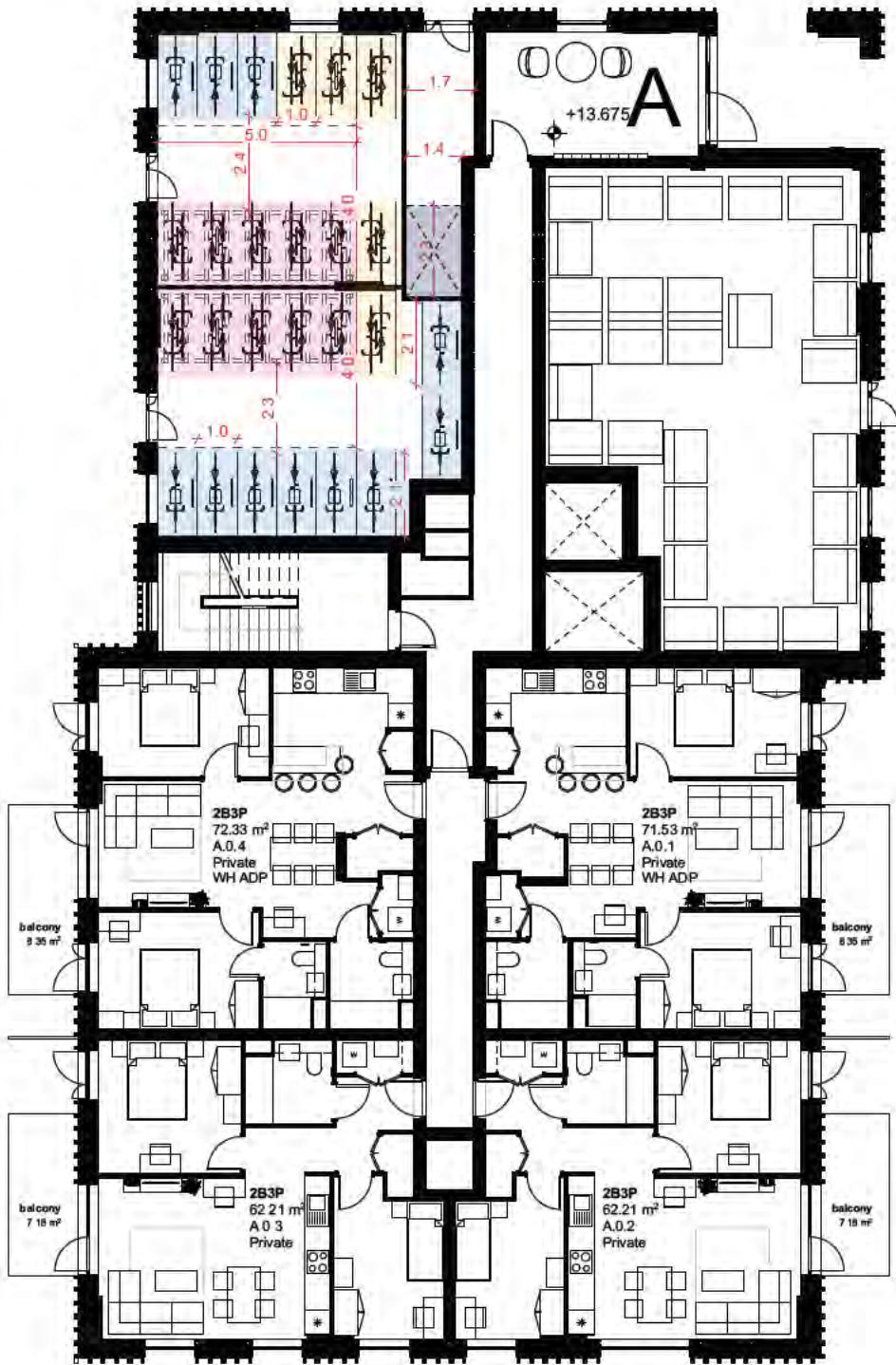
Block A, B and C provide cycle storage at ground and 1st floor levels. Larger cycle stands are generally provided at the ground floor level with typical 2-tier cycle storage largely provided at 1st floor levels.

Blocks A,B and C feature a dedicated internal cycle lift which has been designed to always be entered and exited in a forward direction to make use easier by residents.

Block	Total Cycles REQUIRED	Josta stacker 10 cycles per stacker	Sheffield Stands 2 cycles per stand	Larger Spaces 1 cycles per space	Total Provision	Number of large cycles	% of larger cycles
Block A	219	175	32	12	220	44	20%
Block B	244	196	38	12	246	50	20%
Block C	244	196	38	12	246	50	20%
Block D	112	90	18	4	112	22	20%
Block E1	57	46	10	3	59	13	22%
Block E2	57	46	10	3	59	13	22%
Block E3	57	46	8	4	58	12	21%
Residential required Long Stay	990	796	154	50	1000	204	20%
Residential required Short Stay	14				14		
Total Residential Cycle	1004	796	154	50	1014		

CYCLE STAND TYPE KEY

	TYPE A
	TYPE B
	TYPE C
	TYPE D
	CYCLE LIFT



GROUND FLOOR LEVEL CYCLE STORAGE



FIRST FLOOR LEVEL CYCLE STORAGE

2.0 CYCLE STRATEGY

2.8 BLOCK B

CYCLE STAND LAYOUT WITHIN BLOCKS





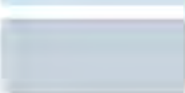
The adjacent plan indicates each type of cycle stands location within the cycle store with layout dimensions.

The below tables sets out the quantum of each type required within each block.

Block B also utilises a cycle lift to access the 1st floor, again designed to be used in a forward direction. There are to cycle stores for Block B, one located towards to rear of the block and easily accessed via a pedestrian route. The route is well lit, overlooked by residents and protected by CCTV.

Block	Total Cycles REQUIRED	Josta stacker 10 cycles per stacker	Sheffield Stands 2 cycles per stand	Larger Spaces 1 cycles per space	Total Provision	Number of large cycles	% of larger cycles
Block A	219	176	32	12	220	44	20%
Block B	244	196	38	12	246	50	20%
Block C	244	196	38	12	246	50	20%
Block D	112	90	18	4	112	22	20%
Block E1	57	46	10	3	59	13	22%
Block E2	57	46	10	3	59	13	22%
Block E3	57	46	8	4	58	12	21%
Residential required Long Stay	990	796	154	50	1000	204	20%
Residential required Short Stay	14				14		
Total Residential Cycle	1004	796	154	50	1014		

CYCLE STAND TYPE KEY

	TYPE A
	TYPE B
	TYPE C
	TYPE D
	CYCLE LIFT



2.0 CYCLE STRATEGY

2.9 BLOCK C

CYCLE STAND LAYOUT WITHIN BLOCKS

The adjacent plan indicates each type of cycle stands location within the cycle store with layout dimensions.

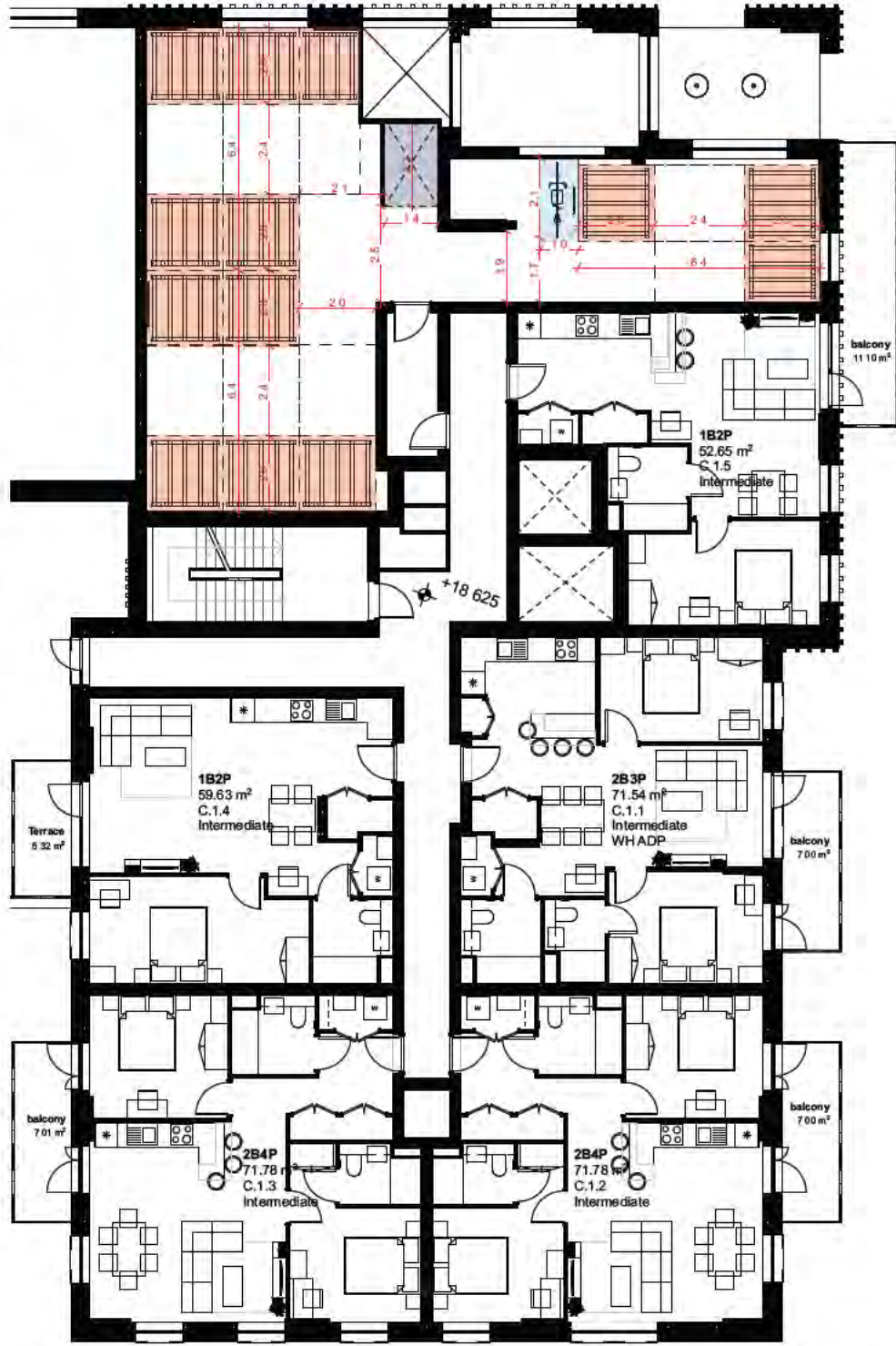
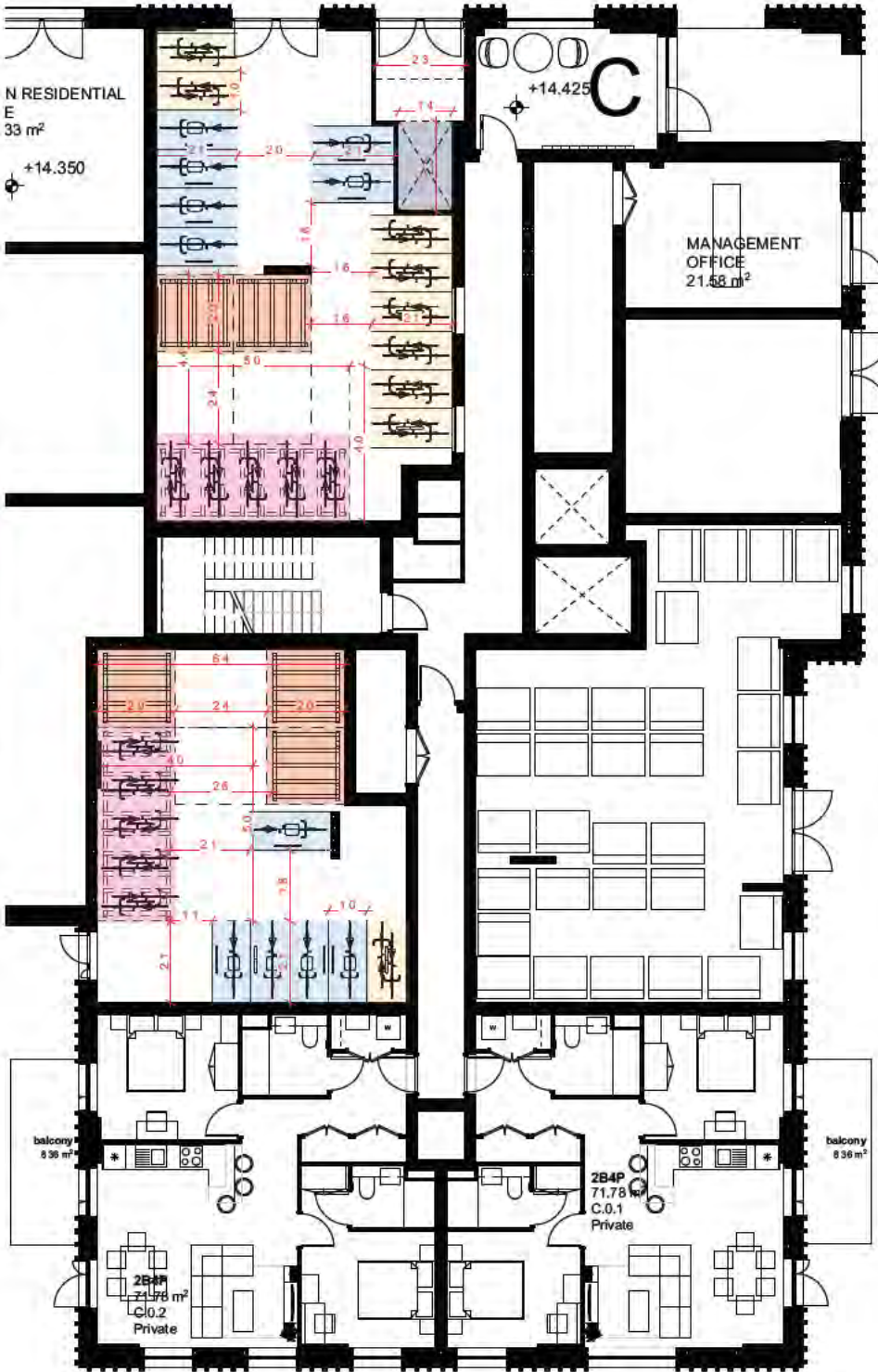
The below tables sets out the quantum of each type required within each block.

Block C again uses a dedicated internal cycle lift to access the 1st floor level. This block also has two ground level cycle storage areas with one located towards the back of the block and accessed via a pedestrian route within the landscaping.

Block	Total Cycles REQUIRED	Josta stacker 10 cycles per stacker	Sheffield Stands 2 cycles per stand	Larger Spaces 1 cycles per space	Total Provision	Number of large cycles	% of larger cycles
Block A	219	176	32	12	220	44	20%
Block B	244	196	38	12	246	50	20%
Block C	244	196	38	12	246	50	20%
Block D	112	90	18	4	112	22	20%
Block E1	57	46	10	3	59	13	22%
Block E2	57	46	10	3	59	13	22%
Block E3	57	46	8	4	58	12	21%
Residential required Long Stay	990	796	154	50	1000	204	20%
Residential required Short Stay	14				14		
Total Residential Cycle	1004	796	154	50	1014		

CYCLE STAND TYPE KEY

- TYPE A
- TYPE B
- TYPE C
- TYPE D
- CYCLE LIFT



2.0 CYCLE STRATEGY

2.10 BLOCK D

CYCLE STAND LAYOUT WITHIN BLOCKS

The adjacent plan indicates each type of cycle stands location within the cycle store with layout dimensions.

The below tables sets out the quantum of each type required within each block.

Block D is located close to Goodmayes Avenue and contains two cycle storage areas as indicated on the adjacent plan.

Block	Total Cycles REQUIRED	Josta stacker 10 cycles per stacker	Sheffield Stands 2 cycles per stand	Larger Spaces 1 cycles per space	Total Provision	Number of large cycles	% of larger cycles
Block A	219	176	32	12	220	44	20%
Block B	244	196	38	12	246	50	20%
Block C	244	196	38	12	246	50	20%
Block D	112	90	18	4	112	22	20%
Block E1	57	46	10	3	59	13	22%
Block E2	57	46	10	3	59	13	22%
Block E3	57	46	8	4	58	12	21%
Residential required Long Stay	990	796	154	50	1000	204	20%
Residential required Short Stay	14				14		
Total Residential Cycle	1004	796	154	50	1014		

CYCLE STAND TYPE KEY

- TYPE A
- TYPE B
- TYPE C
- TYPE D
- CYCLE LIFT



GROUND FLOOR LEVEL CYCLE STORAGE

2.0 CYCLE STRATEGY

2.11 BLOCK E1 AND E2

CYCLE STAND LAYOUT WITHIN BLOCKS




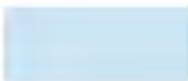
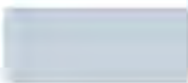
The adjacent plan indicates each type of cycle stands location within the cycle store with layout dimensions.

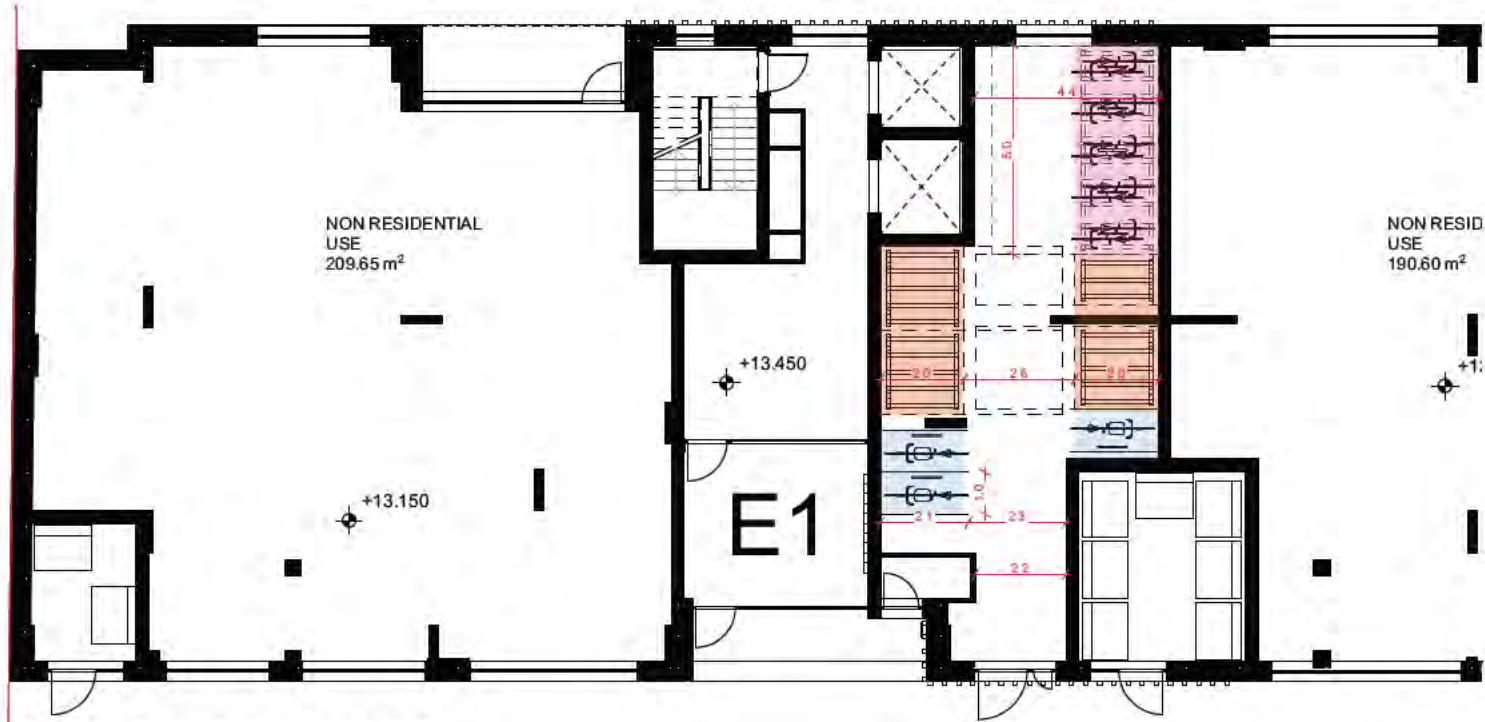
The below tables sets out the quantum of each type required within each block.

Block E1 and E2 have smaller cycle storage areas reflecting the lower number of units within these blocks. Each cycle store is accessed from the southern side next to the residents entrance and has a secondary fixed obscured glazed window to allow light into the store, activate the elevation without compromising security of the store.

Block	Total Cycles REQUIRED	Josta stacker 10 cycles per stacker	Sheffield Stands 2 cycles per stand	Larger Spaces 1 cycles per space	Total Provision	Number of large cycles	% of larger cycles
Block A	219	176	32	12	220	44	20%
Block B	244	196	38	12	246	50	20%
Block C	244	196	38	12	246	50	20%
Block D	112	90	18	4	112	22	20%
Block E1	57	46	10	3	59	13	22%
Block E2	57	46	10	3	59	13	22%
Block E3	57	46	8	4	58	12	21%
Residential required Long Stay	990	796	154	50	1000	204	20%
Residential required Short Stay	14				14		
Total Residential Cycle	1004	796	154	50	1014		

CYCLE STAND TYPE KEY

	TYPE A
	TYPE B
	TYPE C
	TYPE D
	CYCLE LIFT



BLOCK E1 GROUND FLOOR LEVEL CYCLE STORAGE



BLOCK E2 GROUND FLOOR LEVEL CYCLE STORAGE

2.0 CYCLE STRATEGY

2.12 BLOCK E1 AND E3

CYCLE STAND LAYOUT WITHIN BLOCKS

The adjacent plan indicates each type of cycle stands location within the cycle store with layout dimensions.

The below tables sets out the quantum of each type required within each block.

Block E3 again has a smaller cycle storage area reflecting the lower number of units within the block. The cycle store is accessed from the southern side next to the residents entrance and has a secondary fixed obscured glazed window to allow light into the store, activate the elevation without compromising security of the store.

Block	Total Cycles REQUIRED	Josta stacker 10 cycles per stacker	Sheffield Stands 2 cycles per stand	Larger Spaces 1 cycles per space	Total Provision	Number of large cycles	% of larger cycles
Block A	219	176	32	12	220	44	20%
Block B	244	196	38	12	246	50	20%
Block C	244	196	38	12	246	50	20%
Block D	112	90	18	4	112	22	20%
Block E1	57	46	10	3	59	13	22%
Block E2	57	46	10	3	59	13	22%
Block E3	57	46	8	4	58	12	21%
Residential required Long Stay	990	796	154	50	1000	204	20%
Residential required Short Stay	14				14		
Total Residential Cycle	1004	796	154	50	1014		

CYCLE STAND TYPE KEY

<div></div>	TYPE A
<div></div>	TYPE B
<div></div>	TYPE C
<div></div>	TYPE D
<div></div>	CYCLE LIFT



2.0 CYCLE STRATEGY

2.13 SUMMARY

SUMMARY:

As outlined above, the proposed cycle storage layouts allow for 20% of cycle spaces per block store, to be of a larger type for ease of access for all residents.

Where cycle storage is located at Ground and 1st Floor levels, the vast majority of larger Sheffield and single cycle stands are located at the ground floor level.

The full breakdown of the cycle provision is provided on the adjacent summary schedule that highlights the provision of larger cycle storage and numbers of each type.

Of the overall 20% larger cycle stands, 15% are in the form of Sheffield type stand with the remaining 5% being larger, single cycle parking spaces for cargo or similarity sized cycles as agreed with officers at Redbridge Council as part of the pre-Application consultation process.

Block	Total Cycles REQUIRED	Josta stacker 10 cyles per stacker	Sheffield Stands 2 cyles per stand	Larger Spaces 1 cyles per space	Total Provision	Number of large cycles	% of larger cycles
Block A	219	176	32	12	220	44	20%
Block B	244	196	38	12	246	50	20%
Block C	244	196	38	12	246	50	20%
Block D	112	90	18	4	112	22	20%
Block E1	57	46	10	3	59	13	22%
Block E2	57	46	10	3	59	13	22%
Block E3	57	46	8	4	58	12	21%
Residential required Long Stay	990	796	154	50	1000	204	20%
Residential required Short Stay	14				14		
Total Residential Cycle	1004	796	154	50	1014		

BLOCK BY BLOCK RESIDENTIAL CYCLE PROVISION SCHEDULE

3.0

3.0 PODIUM

3.1 PODIUM LOCATION

LAYOUT - GLA COMMENT'S IN SUMMARY

The Stage 1 report highlights that the eastern portion of the site has been revised since GLA officers saw the scheme at pre-application stage and the improved quality of the public realm around the temple building and is welcomed. The general layout approach is supported.

However the area identified as still raising concern, which had been raised previously in the pre-application meeting, is the amenity space between blocks A and B. The report raises concerns with reference to whether the space will have enough ground level animation, whether it will be overshadowed by the scale of the adjacent blocks and whether or not providing the podium space here would provide a better solution.

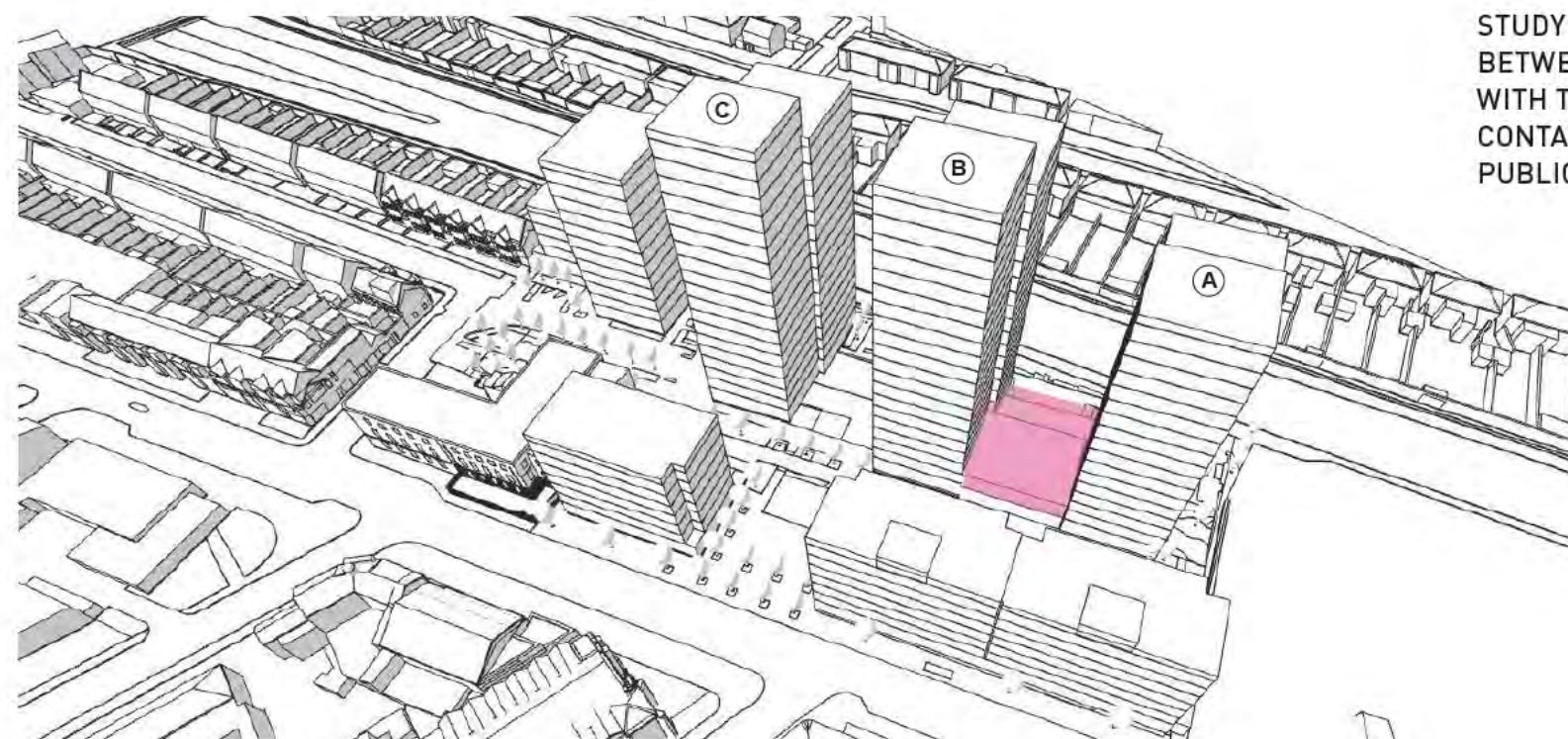
The following pages return to earlier tests as part of the design evolution where the various podium location scenarios were considered; this was discussed and evolved in discussion with the Borough comparing the pros and cons of locating the podium between Blocks A and B, between Blocks B and C or between all blocks.

The team robustly defend the chosen position for the podium at the heart of the development for a number of townscape reasons and outline these below.

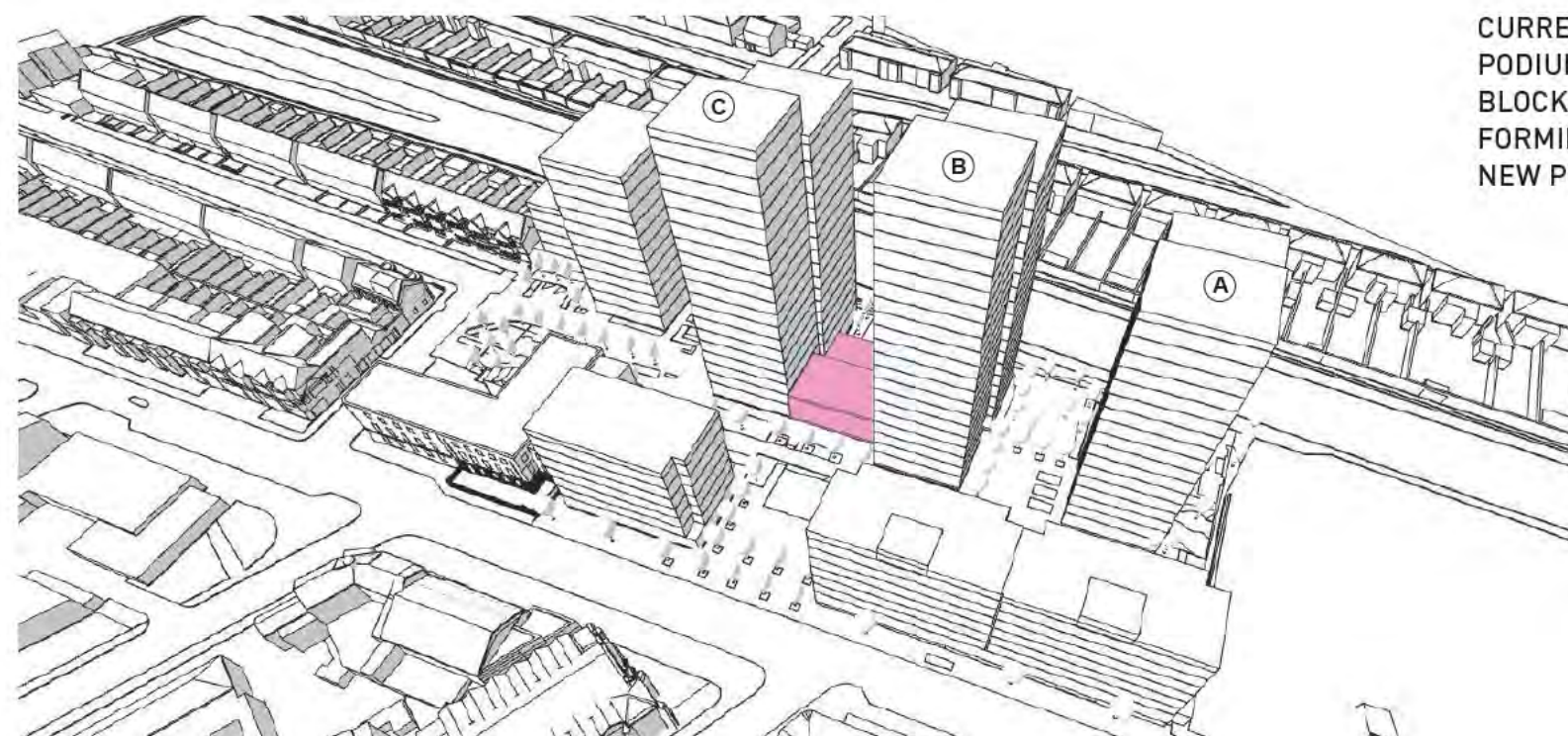
In addition a large number of significant measures were also introduced to address the various concerns outlined originally by the GLA in terms of the quality of the space between Blocks A and B. These are also outlined below as they were perhaps not clearly highlighted previously.

PODIUM LOCATION OPTIONS

The adjacent diagrams indicate the proposed location of the podium (below) and the alternative approach referenced by the GLA (above). The podium location was tested at various times throughout the design process with the proposed location between Blocks B and C providing the preferred overall location for a number of reasons further described further in the following pages.



STUDY WITH PODIUM LOCATED BETWEEN BLOCKS A AND B WITH THE POTENTIAL LOSS OF CONTAINMENT TO THE NEW PUBLIC SQUARE



CURRENT PROPOSAL WITH PODIUM LOCATED BETWEEN BLOCKS B AND C IMPORTANTLY FORMING CONTAINMENT TO THE NEW PUBLIC SQUARE

3.0 PODIUM

3.2 TOWNSCAPE PRINCIPLES

LAYOUT - APPLICANT RESPONSE

Podium location giving physical containment to the new public square - The public square location within the Masterplan has been carefully considered to respond to the surrounding context, in particular St Cedd's church which sits opposite. The square forms an important gateway into the site establishing a connection from the High Road to Goodmayes Avenue that is clear, legible and re-enforced by the buildings layout, form and the proposed landscaping. The podium creates a robust backdrop to the square that ties the sequence of spaces together into a legible pedestrian route into and across the site. Without this back-drop the legibility of the square and route is eroded and the overall quality is diminished as the square will not feel contained.

Podium providing ground floor activation and animations - The location of the ground floor non-residential uses is also key to activating the square and the positioning of the podium, containing a gym, sustainable transport hub and grow room is important to the success of the overall space. The podium is also double-height to give it presence and scale against the large new square.

Townscape legibility and protection from the rail corridor - The podium ties the two taller elements of the scheme together and provides a strong base for these buildings located in the centre of the Masterplan. It steers the views across the site towards the rail corridor to either side creating a rhythm of openness compared to enclosure.

Acoustic protection - The podium provides protection to the square from the acoustic presence of the rail corridor.



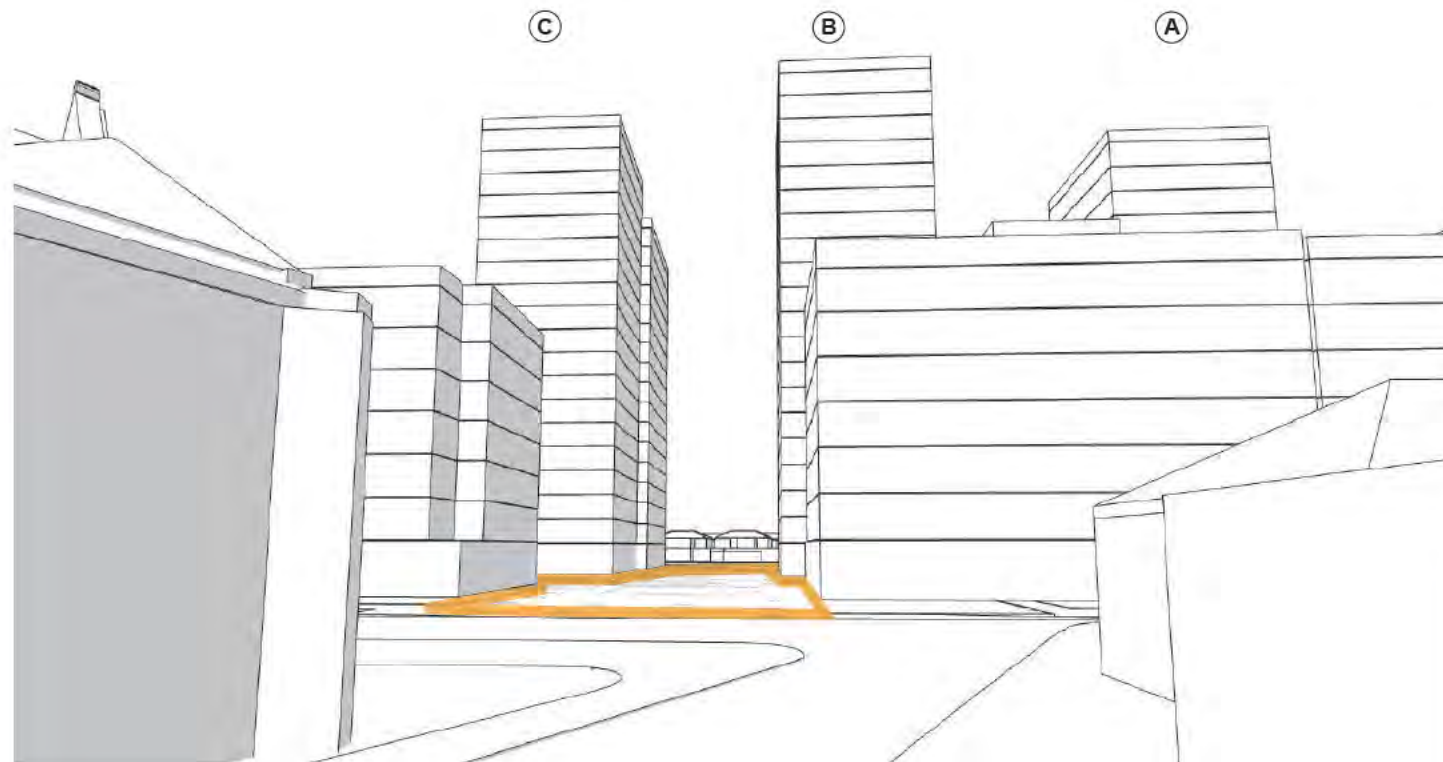
GROUND FLOOR NON-RESI USES LOCATIONS



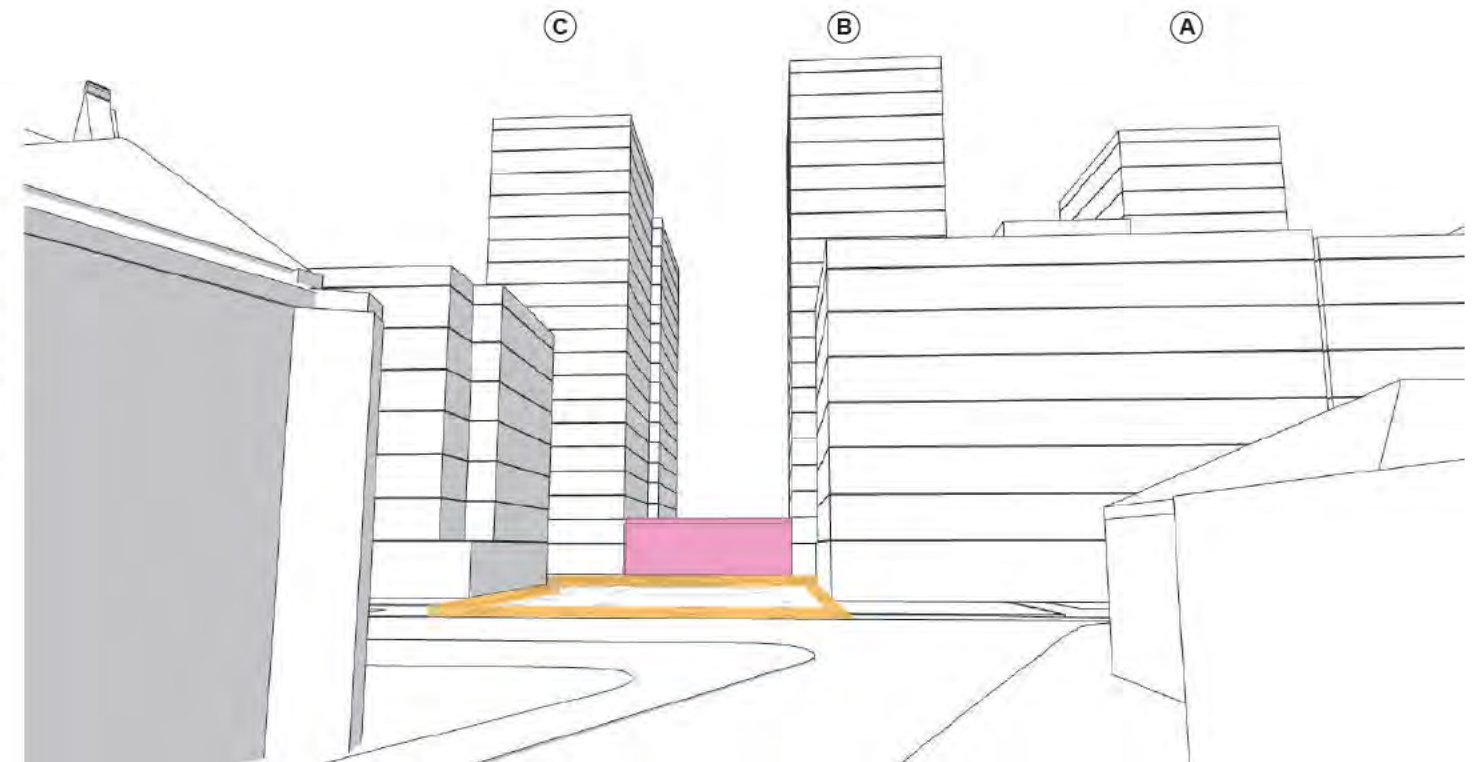
1. NEW PUBLIC SQUARE
2. PODIUM FORMING DOUBLE HEIGHT 'BACK DROP' TO THE NEW SQUARE, CONTAINING THE NEW PUBLIC SPACE AND FRONTING THE NEW CONNECTION TO GOODMAYES AVENUE
3. VISUAL CONNECTION - IMPORTANTLY AT GRADE - ACROSS TO THE RAIL CORRIDOR GIVING A SENSE OF OPENNESS AND VISUAL PERMEABILITY
4. CLEAR LEGIBILITY BETWEEN PUBLIC AND PRIVATE AMENITY WITHOUT FORMING A VISUAL BARRIER. ENHANCING THE VISUAL & PHYSICAL CONNECTIONS TO THE AMENITY AT THE REAR OF THE BLOCKS

3.0 PODIUM

3.2 TOWNSCAPE PRINCIPLES



ALTERNATIVE APPROACH WITH PODIUM LOCATED BETWEEN BLOCKS A AND B, LEAVING THE SPACE OPEN BETWEEN BLOCKS B AND C WITH NO DEFINITION TO THE NEW PUBLIC SPACE



CURRENT AND PREFERRED PROPOSAL WITH PODIUM LOCATED BETWEEN BLOCKS B AND C FORMING A BACKDROP TO THE NEW PUBLIC SQUARE

The views above are from Blythswood Road looking into scheme and to the new public square. The view above is with the podium relocated between Block A and B. As already outlined, the omission of the podium erodes the quality of the public square and reduces the legibility of the pedestrian route within the site. The view to the right hand side is the current proposed arrangement with the podium providing a positive backdrop to the square.

The proposed location of the podium not only encourages a legible route into and across the site, but also provides suitable enclosure for the square to develop a sense of place. As a result users would not only transit through the square but also would feel comfortable staying and enjoying the new public offer.

3.0 PODIUM

3.3 BLOCK A AND B PUBLIC REALM

HIGH QUALITY PUBLIC REALM AT GRADE BETWEEN BLOCKS A AND B

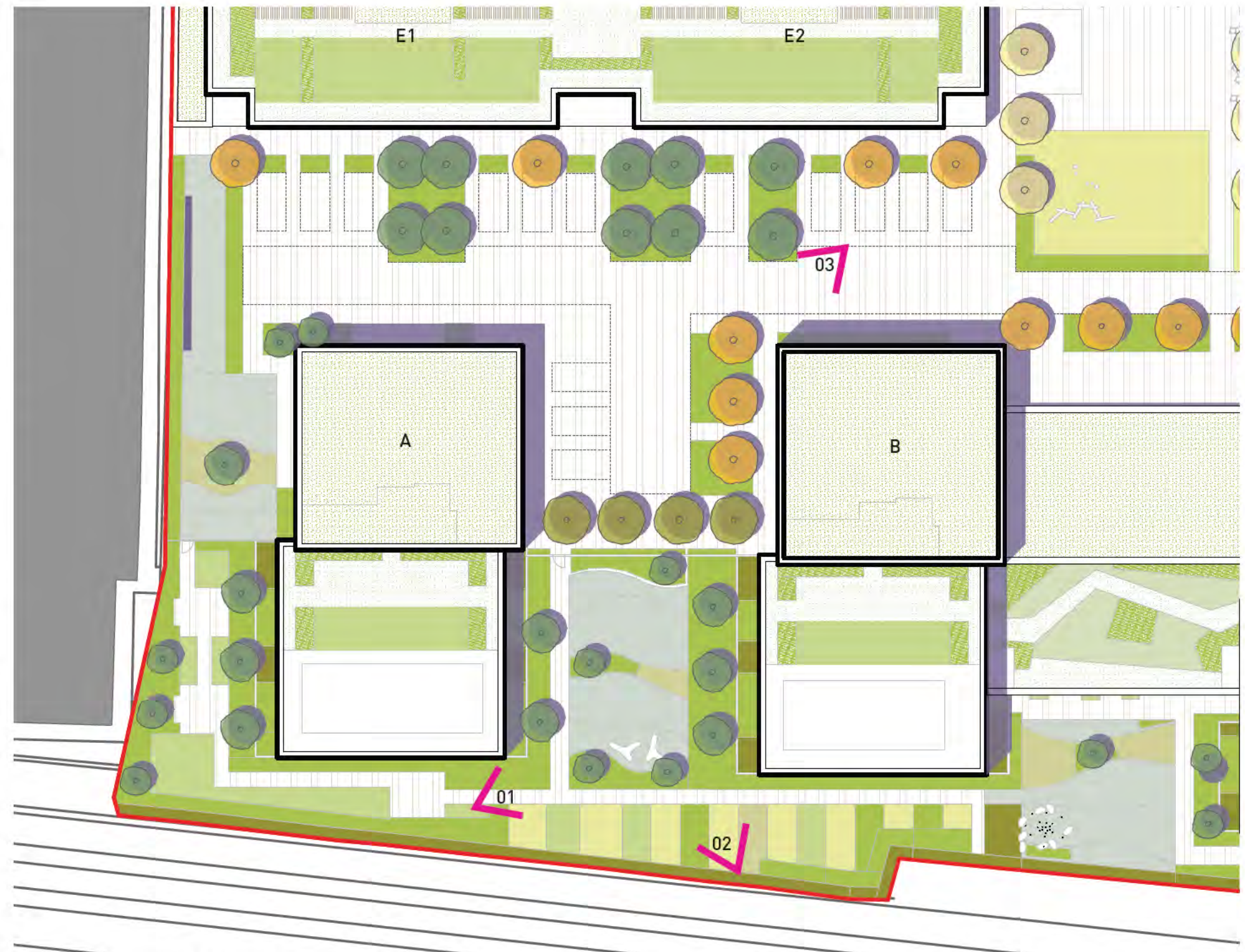
The Masterplan was developed to create a balance between public and private spaces and provide as much active frontage as possible. The areas between Block A and B provides some wheelchair accessible parking set within an area of paved landscaping that also allows for servicing of these blocks. A large residential amenity space is provided to the southern side, flanked on both sides with ground floor residential units with defensible space. This is mirrored as much as possible between Blocks C and D also and creates a framing of the pedestrian views towards the south. By keeping these areas at grade we allow as much light into the central spine route as possible and keep the ground floor uses active also.

The addition of another podium between Block A and B would compromise the servicing strategy as vehicles could no longer turn without a significant and inefficient, non-active under croft space being provided. A podium would also restrict ground level light into the central east/west central route and compress the space between the north and south blocks within this area. In summary the public realm between Blocks A and B has been improved in the following ways:

- INCREASED DISTANCE BETWEEN BLOCK A AND B TO 21M
- STEP IN THE BLOCKS INTRODUCED ENHANCING THE SENSE OF OPENNESS
- INCREASED ACTIVATION AT GROUND FLOOR WITH A DOUBLE HEIGHT ENTRANCE TO BLOCK A OVERLOOKING THE SPACE
- TRANSITION BETWEEN PUBLIC AND PRIVATE SPACE AMENITY DEFINED WITH RAILINGS ALLOWING VISUAL CONTINUITY AND UNINTERRUPTED VIEWS.
- SOUTHERLY LIGHT ALLOWED THROUGH TO THE EAST WEST SPINE ROUTE



DOUBLE HEIGHT
ENTRANCE OVER
LOOKING THE
SPACE BETWEEN
BLOCKS A AND B



LAYOUT OF PROPOSED AREA BETWEEN BLOCKS A & B

3.0 PODIUM

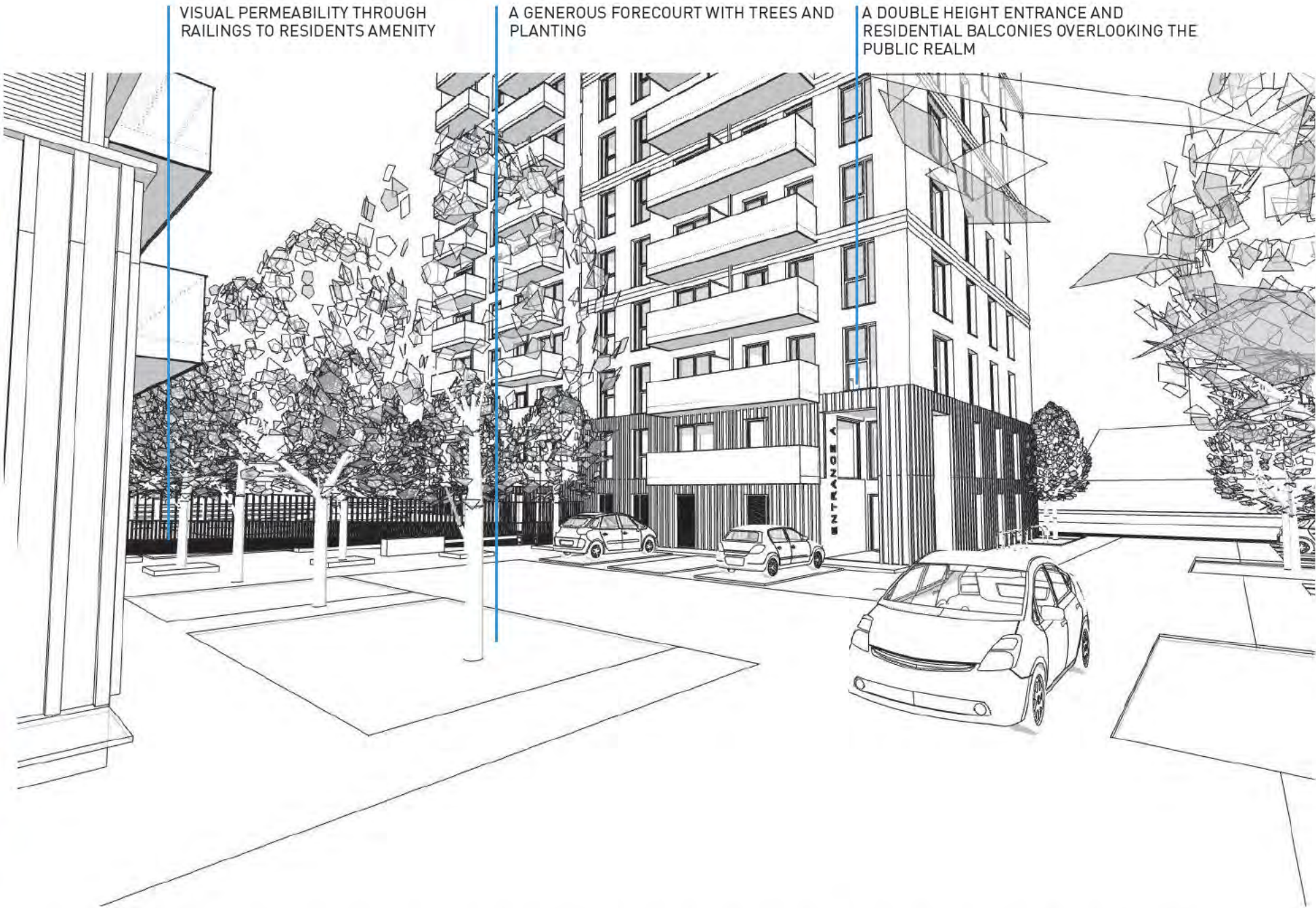
3.3 BLOCK A AND B PUBLIC REALM



VIEW 01 SKETCH OF AMENITY SPACE BETWEEN BLOCKS A & B



VIEW 02 SKETCH OF ALLOTMENTS AN AMENITY SPACE BETWEEN BLOCKS A & B



VIEW 03 PROPOSED LANDSCAPED SPACE BETWEEN BLOCKS A & B INDICATING THE DOUBLE HEIGHT RESIDENTIAL ENTRANCE AREA.

3.0 PODIUM

3.4 SUMMARY

SUMMARY:

The location of the podium between Block B and C within the masterplan was the result of careful consideration having tested various options and alternative locations. The proposed location within the centre of the Masterplan is viewed as the most appropriate location for a double height podium for the reasons set out within this section and summarised below.

- CREATES A ROBUST BACKDROP FOR THE NEW PUBLIC SQUARE HELPING TO DEFINE ITS EDGES AND REINFORCES THE PEDESTRIAN ROUTE TOWARDS GOODMAYES AVENUE.
- PROTECTS THE NEW PUBLIC SQUARE FROM UNWANTED NOISE AND VIEWS ASSOCIATED WITH THE RAIL CORRIDOR.
- PROVIDES AN IDEAL LOCATION FOR PLANT SPACE AT THE REAR TO BE CENTRALISED WITHIN THE MASTER PLAN IMPROVING ENERGY EFFICIENCY.
- PROVIDES A STRONG DOUBLE-HEIGHT BASE GROUNDING THE TALLER ELEMENTS OF THE SCHEME TOGETHER.
- PROVIDES A SUITABLE LOCATION FOR NON-RESIDENTIAL USES WITHIN THE HEART OF THE MASTERPLAN AND THE NEW SQUARE.
- PROVIDES A MORE LEGIBLE DISTINCTION BETWEEN PUBIC AND PRIVATE LANDSCAPED AREAS.

The current configuration creates high quality open space between Blocks A and B that establishes a balance between public and private spaces and provides active frontages and landscaped areas across the masterplan. The wider benefits of not providing a podium between Block A and B are summarised below.

- AN ENHANCED SENSE OF OPENNESS AND SPACE IS MAINTAINED BETWEEN THE NORTHERN BLOCKS AND SOUTHERN BLOCKS ALONG THE EAST/WEST ROUTE.
- INCREASED GROUND FLOOR ACTIVATION CREATED WITH ACTIVE FRONTAGES AND RESIDENT OVERLOOKING WITHIN THESE AREAS.
- ALLOWS SOUTHERLY LIGHT DEEP INTO THE MASTERPLAN.
- CREATES A HIERARCHY OF OPEN AND CONTAINED SPACES ACROSS THE MASTERPLAN.
- HIGH QUALITY LANDSCAPED AREAS WITH INCREASED GROUND LEVEL TREE PLANTING.



4.0

4.0 FIRE SAFETY

4.1 FIRE SAFETY RESPONSE

FIRE SAFETY

FIRE SAFETY - GLA COMMENT

A fire statement has been submitted as required by Policy D12 of the London Plan. The applicant should confirm that the proposed development would also comply with the requirements of Policy D5 of the London Plan to provide a suitably sized evacuation lift to allow emergency evacuation for people who require level access.

APPLICANT RESPONSE PROVIDED BY DESIGN FIRE CONSULTANTS

The proposed development shall be designed to comply with the requirements of Policy D5 of the London Plan where at least one fire evacuation lift shall be provided to every lift core. Vertica Consulting have confirmed that well widths and headrooms can accommodate evacuation lifts.

TOTALS OF THE SCHEME

568 Homes
1496 Habitable rooms

HOUSING MIX

	STUDIO	1B	2B	3B	TOTAL UNITS
AFFORDABLE RENT	0	18	49	26	93
	0.0%	19.4%	52.7%	28.0%	100.0%
INTERMED ATE SALE	0	15	41	15	71
	0%	21%	58%	21%	100%
PRIVATE SALE	74	112	198	20	404
	18.3%	27.7%	49.0%	5.0%	100.0%
ACROSS TENURE	74	145	288	61	568
	13.0%	25.5%	50.7%	10.7%	100.0%

TENURE MIX

RENT		INTERMEDIATE		TOTAL AFFORDABLE		% SPLIT		PRIVATE SALE	
TOTAL UNITS	93	TOTAL UNITS	71	TOTAL UNITS	164	RENT	INTERMEDIATE	TOTAL UNITS	404
UNITS AS %	16.4%	UNITS AS %	12.5%	UNITS AS %	28.9%	56.7%	43.3%	UNITS AS %	71.1%
HAB ROOMS	311	HAB ROOMS	213	HAB ROOMS	524			HAB ROOMS	972
HAB RMS AS %	20.8%	HAB RMS AS %	14.2%	HAB RMS AS %	35.0%	59.4%	40.6%	HAB RMS AS %	65.0%
NET m2	6648	NET m2	5026	NET m2	11675			NET m2	23606
NET AS %	18.8%	NET AS %	14.2%	NET AS %	68.7%			NET AS %	66.9%

ASPECT

	SINGLE	DUAL
AFFORDABLE RENT	48	45
	8.5%	7.9%
INTERMED ATE SALE	22	49
	4%	9%
PRIVATE SALE	199	205
	35.0%	36.1%
ACROSS TENURE	269	299
	47.4%	52.6%

WHEELCHAIR PROPERTIES:	ADAPTABLE HOMES	47
	ACCESSIBLE HOMES	9
	TOTAL	56

Tenure	Studio	1B2P	2B3P	2B4P	3B4P	3B5P	Totals
Private	74	112	101	97	0	20	404
Intermediate	0	15	0	41	0	15	71
Affordable	0	18	9	40	2	24	93
							568

Breakdown of Unit types by Tenure
All Private and Intermediate Wheelchair adaptable layouts are counted as 2B4P Layouts. Wheelchair accessible layouts in the Affordable are delivered and counted as 2B3P units.

rev	date	description
01	18/12/2020	Planning App 2nd Draft
02	08/02/2021	Planning Submission
03	20/05/2021	Label Update

London Borough of Redbridge Design Review Panel

Report of Formal Review Meeting: 720 High Road

Tuesday 14 July
Conference call

Panel

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Attendees

[REDACTED]	London Borough of Redbridge
[REDACTED]	London Borough of Redbridge
[REDACTED]	Frame Projects
[REDACTED]	Frame Projects

Apologies / report copied to

[REDACTED]	London Borough of Redbridge
[REDACTED]	London Borough of Redbridge
[REDACTED]	Frame Projects

Confidentiality

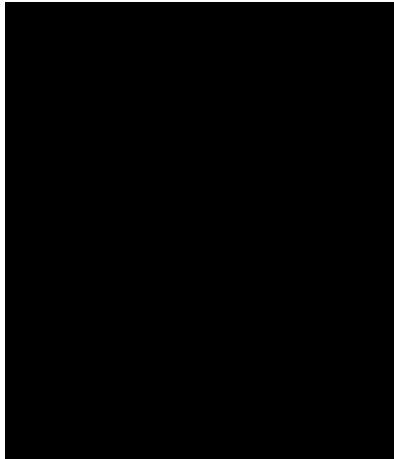
This is a pre-application review, and therefore confidential. As a public organisation Redbridge Council is subject to the Freedom of Information Act (FOI), and in the case of an FOI request may be obliged to release project information submitted for review.

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1. Project name and site address

Former 'Homebase' Retail Warehouse, 706-720 High Road, Goodmayes, IG3 8RS

2. Presenting team



Stockwool Architects
Stockwool Architects
Stockwool Architects
Savills
Fabrik Limited
Fabrik Limited
Clarion Housing Group
Hadley Property Group Ltd
Hadley Property Group Ltd
Rolfe Judd Planning
Rolfe Judd Planning

3. Planning authority briefing

The 1.25 hectare site currently comprises a 5,600 sqm Homebase store with a car park containing over 160 spaces. To the west of the site there is an Aldi store and to the east there is a Singh Saba Gurudwara, a Sikh temple, facing High Road. St Cedd's Catholic Church, a non designated Heritage Asset, and the locally listed Ilford Grammar School, also a non designated Heritage Asset, sit opposite the site.

The site falls within opportunity Site 73 in the Local Plan, which is allocated to provide 2,500 sqm retail and 179 homes on an area of 1.04 hectares. There is also potential to link the site to 674-700 High Road, which forms Opportunity Site 59 and is allocated for 170 homes, 1,000 sqm retail and 2,650 sqm employment floorspace.

The site has a PTAL rating of 3 and is a five minute walk, from both Goodmayes and Seven Kings overground stations. There are plans to introduce borough wide Controlled Parking Zone that will support car free development, except for 10% of homes having a disabled parking space, covering the Crossrail Growth area.

The principle for a mixed use high density residential scheme is supported by Redbridge however they highlight the following points for consideration. Employment levels need to be maintained to expected site allocation levels. Leisure use / community / childcare space should be provided to support the needs of the community and make for a successful public space. The panel's views were requested on: the towers in townscape views; the residential quality of the scheme; defensible space; communal and play space; parking; servicing; and vehicular routes through the site.

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4. Design Review Panel's views

Summary

The panel welcomes the opportunity to comment on this scheme which will form part of a series of developments along the Crossrail corridor in Redbridge. The proposals are still at an early stage, and while the panel is supportive of the key site arrangement moves, it would like to see more careful consideration of a number of elements to ensure that a high quality neighbourhood will be created for the large number of residents who will live here. In the panel's view the block heights appear arbitrary rather than based on a convincing townscape analysis. It would like to see a scheme that is generated from a highly successful ground plane, creating a quality public realm, with carefully thought out building edges, routes and spaces, in order to support an appropriate density and height. The approach to the placement of smaller blocks along the High Road and taller blocks toward the railway is supported. The panel suggests testing if the taller blocks to the south could sit closer to the railway line and respond to its geometry in any way. The landscape and public realm proposals require further clarity and hierarchy. In particular the panel were not yet convinced about the location, enclosure and design of the public square. The panel would like to see the edges of buildings more carefully considered ensuring there is proper active frontage across the ground floor. One idea to consider might be to relocate the service route and parking to the southern edge and bringing the proposed green route into the heart of the site to enable a clearer site strategy and better pedestrian movement within the heart of the site. The panel emphasises the importance of trees in contributing to placemaking, and would like to see them carefully placed to increase the legibility of the site as at the moment they seem to be located only where the highways derived movement layout allows. Innovative uses at ground floor are welcome, and the design team is encouraged to ensure that these do actually contribute to the public realm or else locate them in less prominent areas of the site and not onto the main square. The panel suggests there is an opportunity to provide additional residential units to activate the ground floor that is currently excluded by the amount of ground floor space being needed for cycles, plant and refuse stores for the very dense and tall buildings above. Play space provision requires more careful thought and the panel encourages the design team to consult carefully with all the existing communities who will be impacted by this development. These points are expanded below.

Height and massing

- While the panel acknowledges that there are a series of sites along the Crossrail corridor coming forward for development, it notes that the proposed development is very different in scale and density to its immediate existing context.
- In the panel's view the proposed block heights appear arbitrary rather than based on a meaningful townscape analysis of what is a positive approach for this site.



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- The panel feels the predetermined height of the blocks is dictating the amount facilities required at ground floor, such as storage for bikes, bins etc. This leaves little room to create activity at ground level.
- The panel recommends the design team develop a scheme that is generated from a successful ground floor plane, allowing for activity at ground level in the right places and in locations that feel positive and attractive. The quantum of accommodation and height of the blocks should then be generated from this.
- The panel could support the level of density proposed if it is driven by a really good quality public realm and ground floor layout with carefully thought out building edges.
- The articulation of height across the scheme, with a crescendo in height in the centre, creates an impression of significance which sits in competition with the 'Tesco Goodmayes' scheme.
- The panel recommends that more equivalence between the blocks may allow the development to appear less like it is competing with the proposed context.
- The panel would like to see studies which show the daylight and sunlight impact of the form and massing of the blocks on each other, as well as the public realm.
- The panel is concerned with the view from Goodmayes Avenue which shows the dominance of the side of the proposed blocks within the existing townscape and which appear very wide and blocky.
- The panel encourages the design team to be realistic with how they represent the scale of the proposals in relation to St Cedd's Church in images.

Site layout

- The panel broadly agrees with the principle which locates lower scale blocks along the High Road and sets taller blocks back against the railway.
- It commends the design team's approach to the High Road which works well in terms of the siting of the buildings and the location of the square in relation to St Cedd's Church opposite.
- However, some of the panel questioned if there is an opportunity to move the public square to the east end of the site, allowing it to be defined by both St Cedd's Church and the Gurudwara. It suggests this approach could be explored with innovative ideas to deal with the less attractive edge of the Gurudwara, such as lining the wall or creating a long narrow café space.



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- The panel references the Seven Kings Car Park development which places tall buildings along the edge of the railway, which works successfully. It suggests the design team should consider if the tall buildings could be located closer to the railway to allow for more space elsewhere on the site.
- The panel suggests there may be an opportunity to look at the geometry of the building footprints in relation to the railway. This could create more open and generous spaces between the High Road blocks and the blocks to the south of the site.
- It notes that blocks which are less orthogonally aligned could allow for more flexibility in the distances between them. This freedom could create interesting design opportunities - this may also allow for greater connection into the east west route from Goodmayes Avenue.

Public realm

- The landscape and public realm proposals require further clarity and hierarchy in order to be successful.
- The panel would like to see a closer alignment between how ideas are described by the applicant team and the content of the proposals. It finds elements of the proposed sketches exciting but finds this quality lacking in other drawings.
- In the panel's view it is unfortunate that all the more social spaces of the public realm appear to be pushed to edges of the site.
- The quality of thresholds between buildings and the public realm will help define the scheme's success. The panel encourages the design team to look at the levels of activity which will occur here to ensure the public realm works successfully.
- The panel acknowledges that there is a requirement for some parking provision, and would encourage the design team to ensure that the scheme can still work successfully if it is required to provide seven per cent parking.
- The legibility and quality of the public realm could be improved by relocating the service and access route, currently through the middle of the site, to its southern edge. The green route could then be moved to the centre of the site, allowing it to contribute to heart of the scheme.
- Alternatively, the design team could explore relocating the podium garden so a direct link is created from the public square to the green space at the south of the site, allowing pedestrians to be drawn into the site.
- The panel commends the aspiration to maximise the green qualities of the public realm, and while it is excited by the concept of an orchard it feels proposals currently appear like a series of street trees.



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- The panel notes that carefully positioned trees will enhance the clarity and hierarchy of the public realm, and emphasises the placemaking potential of tree planting.
- The panel commends the inclusion of allotments in the proposals and would encourage the design team to ensure these are workable in reality.
- The panel highlights that parking is facilitated on the sunnier side of the public realm – which may not be the best use of an area that could be enjoyed by residents. It would encourage daylight and sunlight studies, as well as wind analysis, to inform the design of the public realm.
- The panel commends the widening of the footway along High Road.
- As proposed the public square feels more like a gap between buildings than a public space. Active frontages onto this space will be vital to its success, with a landscape design based on a clear idea of how it will be used.
- The design team describe the public square opening up to St Cedd's Church opposite. However, the proposed tree density increases here – potentially obscuring the view, and the panel suggests trees should be positioned to frame the view.

Ground floor

- The ground floor would benefit greatly from more active uses, potentially including more residential units. This is a particularly good opportunity for wheelchair accessible units with parking spaces adjacent.
- The panel is encouraged by the interesting and innovative uses being proposed across some of the ground floor.
- However, there is a risk that the music academy may form a 'blank box' on to the square. The panel encourages the design team to consider if it can create more active frontage in this key location.
- The inclusion of the childcare co working space is welcome, but would benefit from some designated external space.

Play

- Good quality play space will be essential to a development of this density. The panel is concerned about the quality of play space in the south west of the site, which feels detached from the rest of the proposals.
- The eastern edge of the play space is lined with cycle storage. A more active use here which would provide some passive surveillance might make this space feel safer.



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Cycle parking

- The panel finds the dominance of cycle parking along the ground floor frontage unfortunate. It suggests the design team explore exciting alternative storage solutions for bike storage to allow for improved building frontages and public realm.
- For example, bike storage could be provided on each residential floor, or inside individual homes. This approach could offer more practical storage that residents will want to use, and which will therefore encourage the use of bikes.

Engagement

- The panel encourages the design team to meaningfully engage with the established communities in the area.
- It highlights that Sikh weddings which will take place frequently at the Gurudwara will significantly affect the character of the area, with large groups of people and cars.
- The design team should engage with the congregations of both St Cedd's Church and the Gurudwara to understand how the nature of the place will be affected by weddings at the weekends, and how proposals could embrace this.

Architectural expression

- Detailed architectural proposals have not yet been developed. The panel highlights that the key site arrangement moves discussed are intertwined with the proposals architectural expression and it looks forward to reviewing the proposed architecture at the next review.
- The panel would however note that further clarity is required to create a sense of the front door to the proposals and how this works with the more communal and private areas as fronts and backs – this may begin to be articulated through the proposed architecture.

Next Steps

The panel would welcome the opportunity to review the proposals further once they have been revised in response to the comments above.



New requirements of the 2021 London Plan relating to planning decision-making

Issue	Policy	Requirement	Comments	Suggested condition and / or S106 wording
Zero carbon	SI2	Part B <i>“Major development proposals should include a detailed energy strategy to demonstrate how the zero-carbon target will be met within the framework of the energy hierarchy”</i>	Application stage / S106 The carbon offset contribution should be adjusted totake into account the zero carbon requirement for all uses and the new calculation methodology in the latest energy guidance. Refer to Energy Planning Guidance (April 2020).	
‘Be seen’ energy monitoring	SI2	Part A4 <i>“be seen: monitor, verify and report on energy performance.”</i>	S106 This is a requirement for all major applications. Refer to draft ‘Be Seen’ Energy Monitoring LPG.	Suggested S106 wording <u>Definitions</u> “Defects Liability Period” means such period of time following Practical Completion of a Building in which a contractor may remedy defects as may be included in the building contract for the relevant Building; “Energy Monitoring Portal” means the ‘Be seen’ webpage of the GLA’s website and the email address ZeroCarbonPlanning@london.gov.uk , or any other such method of submission that may replace this “Reportable Unit” means a Reportable Unit (Energy Centre), Reportable Unit (Residential) or Reportable Unit (Non-Residential); “Reportable Unit (Energy Centre)” means either a connection to third-party District Heating Network, a self-contained Energy Centre serving multiple residential/non-residential properties (within the Site) or a self-contained energy system serving multiple residential properties (within a Block or Building); “Reportable Unit (Residential)” means an individual Block or Building of five or more flats or a group of five or more houses; “Reportable Unit (Non-Residential)” means a Building with a single occupier/tenant (including block of flats’ communal areas) or a Building with multiple tenants. <u>Clauses</u> a) Within 8 weeks of the grant of planning permission, the Owner shall submit to the GLA accurate and verified estimates of the ‘Be seen’ energy performance indicators, as outlined in the ‘Planning stage’ section / chapter of the GLA ‘Be seen’ energy monitoring guidance document (or any document that may replace it), for the consented development. This should be submitted to the GLA’s Energy Monitoring Portal in accordance with the ‘Be seen’ energy monitoring guidance. b) Prior to each Building being occupied, the Owner shall provide updated accurate and verified ‘as-built’ design estimates of the ‘Be seen’ energy performance indicators for each Reportable Unit of the development, as per the methodology outlined in the ‘As-built stage’ chapter / section of the GLA ‘Be seen’ energy monitoring guidance (or any document that may replace it). All data and supporting evidence should be uploaded to the GLA’s Energy Monitoring Portal. The owner should also confirm that suitable monitoring devices have been installed and maintained for the monitoring of the in-use energy performance indicators, as outlined in the ‘In-use stage’ of the GLA ‘Be seen’ energy monitoring guidance document (or any document that may replace it).

New requirements of the 2021 London Plan relating to planning decision-making

				<p>c) Upon completion of the first year of Occupation or following the end of the Defects Liability Period (whichever is the later) and for the following four years after that date, the legal Owner is required to provide accurate and verified annual in-use energy performance data for all relevant indicators under each Reportable Unit of the development as per the methodology outlined in the 'In-use stage' chapter / section of the GLA 'Be seen' energy monitoring guidance document (or any document that may replace it). All data and supporting evidence should be uploaded to the GLA's Energy Monitoring Portal. This obligation will be satisfied after the Owner has reported on all relevant indicators included in the 'In-use stage' chapter of the GLA 'Be seen' energy monitoring guidance document (or any document that may replace it) for at least five years.</p> <p>In the event that the 'In-use stage' evidence submitted under ClauseXX shows that the 'As-built stage' performance estimates derived from Clause XX have not been or are not being met, the Owner should investigate and identify the causes of underperformance and the potential mitigation measures and set these out in the relevant commentbox of the 'Be seen' spreadsheet through the GLA's Energy Monitoring Portal. An action plan comprising measures identified in Clause XX shallbe submitted to and approved in writing by the GLA, identifying measures which would be reasonably practicable to implement and a proposed timescale for implementation. The action plan and measures approved by the GLA should be implemented by the Owner as soon as reasonably practicable.</p>
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Dear [REDACTED],

I have perused the application and I have the following comments to make:

The supporting documents, unless I am mistaken, makes no reference to noise and vibration with respect to the close proximity of the proposed to the over ground railway.

To ensure that new occupiers are not affected by external noise and vibration you may wish to consider the below drafted conditions or refuse the planning application unless or until the following is confirmed by the applicant in an acoustic report.

Also included below is comments without suggested conditions that will assist you in making a cogent decision with respect to this major application. Naturally, I am happy to collaborate with applicants appointed consultants going forward.

1. Internal noise level – noise ingress

Guidance on acceptable internal noise levels in residential dwellings is given in BS 8233:2014 Sound insulation and noise reduction for buildings, and is also provided by the World Health Organisation.

Condition A

The building has to be designed to meet the following internal criteria:

- Living Rooms: 35 dB LAeq,16hr (between 07:00 and 23:00 hrs)
- Bedrooms: 30 dB LAeq,8hr (between 23:00 and 07:00 hrs)

The scheme shall be fully implemented in accordance with the approved details.

Condition B

Prior to occupation of residential elements of the scheme, acoustic commissioning testing shall be undertaken by an ANC/IOA accredited organisation at the most noise exposed habitable room of each acoustic facade specification to demonstrate compliance with the noise level criteria of Condition A, D & E. The testing shall be carried out over a period of minimum 24 hours and the results shall be submitted to and approved in writing by the Local Planning Authority prior to occupation of residential units.

2. Tactile vibration

Tactile vibration is that which is perceived as mechanical motion. BS 6841: 2005 Guide to Evaluation of Human Exposure to Vibration in Buildings Part 1: Vibration Sources Other Than Blasting provides procedures for assessing the potential human response to vibration.

Condition C

The Vibration Dose Values (VDV) should be calculated and assessed from the measured acceleration levels in accordance with BS 6841:2005 (revised). For residential development, the VDV (m/s^{1.75}) should not exceed 0.2-0.4 during the day and 0.1-0.2 at night.

3. Re-radiated noise

There is currently no international or British Standard which provides guidance on assessing the impact of ground-borne noise from railways on the occupants of a building. The Association of Noise Consultants (ANC) guidelines 'Measurement and assessment of ground borne noise and vibration', 2nd edition published in 2012, is generally used as the basis of assessments such as this.

Condition D

Re-radiated noise, within habitable residential rooms, as a result of vibration from adjacent railways and other sources, should not exceed $L_{A\max}$ 35 dB. Where it is predicted that noise from this source, after allowing for predictive uncertainty, is likely to exceed $L_{A\max}$ 35 dB, proposals to mitigate re-radiated noise to acceptable levels shall be submitted to and approved in writing by the Group Manager of Environmental Health.

4. Provision of flexible Class E and F1 floorspace at ground and first floor. To ensure the acoustic acceptability of new fixed building services plant that may be introduced as part of the Development you may wish to consider the below drafted condition:

Condition E

Noise emitted from any new fixed building services plant and equipment shall be designed to a level at least 10 dB below the lowest representative existing background noise level when assessed in accordance with BS 4142:2014 at a position 1 m from the window of the nearest noise sensitive premises (i.e. $Plant\ L_{Ar,Tr} = -10\text{ dB } L_{A90,T}$). This criterion applies to the total contribution of noise from all new plant items associated with the Proposed Development that may run during any particular period.

5. Provision of flexible Class E and F1 floorspace at ground and first floor. The hours of operation, loading, unloading and deliveries needs to be controlled to prevent any residential loss of amenity.

6. Provision of flexible Class E and F1 floorspace at ground and first floor. I am seeking to effectively control and manage environmental, neighbour and neighbourhood noise with respect to classes E & F1. To avoid significant adverse impacts on health and quality of life, mitigate and minimise adverse impacts on health and quality of life, and where possible, contribute to the improvement of health & quality of life, the sooner I know what exact business will be operating the better I can stipulate noise levels, good design, engineering and administrative approaches to managing noise.

7. F1 class. The government published a performance document, Building Bulletin 93 (BB93) Acoustic Design of Schools, in 2003 to aid the design and construction of new education buildings. The Guides state the acceptable levels of sound and reverberation that are appropriate in various types of room (depending on their function) and provide advice on how to design the spaces effectively for their function. Maximum levels of impact sound (such as footfall from a room above), and airborne sound from both inside and outside the building, are specified. The standards laid out in BB93 don't just focus on protecting and helping students, but also teachers and other staff as well.

I would request that the applicant engage an acoustic consultant to meet all the criteria of BB93. Also, new schools in the United Kingdom are now required to comply with Part E of the Building Regulations (Approved Document D); this also includes new educational premises that are being created through changing the function of an existing building. I would infer from this that the new building for teaching and educational purposes (Use Class D1) must comply with this too. Happy to discuss with noise consultant.

Finally, the construction phase needs to be critiqued. If this application is approved, then a condition will be required for the submission of a Construction Environmental Management Plan (CEMP). The CEMP should detail management measures to minimise environmental impact from the construction phase of the development. The CEMP, should set out to ensure compliance with current legislation and effectively minimise any potential adverse environmental effects during construction or deconstruction. They need to adhere to British Standard 5228 Code of practice for noise and vibration control on construction and open sites. Part 1 – Noise and Part 2 – Vibration (as amended, BS 5228-1:2009+A1:2014 and BS 5228-2:2009+A1:2014). The type of piling proposed will have to be clarified in the piling operations chapter of the CEMP. The Pollution team will not support diesel or air driven impact or drop hammer piling due to its adverse noise and vibration effects. In fact we would advocate that press-in method is deployed, also known as 'silent press'.

Please come back to me if you require any further clarification.

Regards,

A black rectangular box used to redact the signature of the sender.

Item Number	Item Subject	Page(s) referred to	Query [NOVA]	Response [-]	Revision [NOVA]	Second Response [-]	Item Closed?
1	Simulation of Atmospheric Winds	Page 5	Please provide a comparison of the simulated atmospheric boundary layer in the wind tunnel with the output from the wind climate model of the proposed development site. If any mismatch between the target and the measured profile should be present, please provide a commentary on the relevance of this mismatch to the results of the wind tunnel study.	The approach used to transpose the weather station data to the Site location is the industry standard ESDU methodology. The wind tunnel profiles that closely match those produced by ESDU terrain roughness assessment were selected for the assessment and shown in the Appendix Figure 1. The only mismatch observed between the wind tunnel profile and ESDU is for the turbulent intensity, which is less likely to be of significant influence considering the marginal differences up to the height of the Proposed Development. In addition, the local turbulence intensity will be influenced by the surrounding buildings that are modelled as part of the assessment which have a more significant impact.			No
2	Desired Pedestrian Activity around the Development	Page 8	A table / figure indicating the expected usage of each probe location in every configuration would aid interpretation of the results.	A table listing all usage of each probe locations has been provided within the updated report and can be seen in Table 1 in the appendix.			No
3	Occurrence of Strong Winds	Page 10	Table 2 indicates that there is an exceedance of the safety criteria that persists for the mitigated scenario in existing surrounds (Location 142). Whilst it is subsequently noted that this location is "...located within some hedging..." (Page 16) and an additional probe has been added between the two safeties from the unmitigated scenario, it is not evident that due consideration has been given as to whether the safety exceedance could persist on the immediately adjacent thoroughfare. Please comment.	The isolated safety exceedance reported at probe location 142 would exceed the safety threshold by 0.06 hours per annum and as noted was positioned at a location surrounded by hedging and landscaping inaccessible to pedestrians. A blue badge holders car park would be located to the east and west sides of probe locations 142 as shown in Figure 2 in the appendix, covered by probe locations 138 and 144 which would have wind conditions suitable for standing and strolling use respectively during the windiest season. Probe location 210 was added along the thoroughfare to the south of the blue badge holders car park and closer to Block A north-western corner to capture the flow acceleration which reported strolling use conditions during the windiest season. As such, we expect that conditions further away from the building corner are likely to remain between the standing and strolling wind conditions as shown by the probes discussed here.			
4	Mitigation Measures	Page 16	Figure 37 "Proposed landscaping and mitigation measures" does not appear to include all mitigation measures used in the final wind mitigation strategy (i.e. addition of two 5-6m tall evergreen trees northeast of Block A). Please review & update.	The image provided was for the proposed landscaping devoid of any wind mitigation measures. This have been updated in the report and shown in Figure 3 in the appendix.			No
5	Results	Page 17 & Figure 16	In Configuration 4, Irwin probe 12 is considered as walking use for the windiest season, while in Configuration 2 is considered suitable for strolling. However, as there are no mitigation measures close to probe 12, they should not affect the results - please provide comment.	The main differences between Configurations 2 and 4 is the introduction of proposed landscaping and wind mitigation measures on-Site. Probe 12 was marginal between categories and would remain suitable for the intended use being in the middle of the road.			