The Avenue Public House and Ford Motor Garage, 902-910 Eastern Avenue
in the London Borough of Redbridge
planning application no. 5988/16

<table>
<thead>
<tr>
<th>Strategic planning application stage 1 referral</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>The proposal</th>
</tr>
</thead>
<tbody>
<tr>
<td>Demolition of existing buildings. Erection of part two, part six, part seven, part eight, and part twelve storey block containing 181 residential units with associated access, amenity space, landscaping, refuse storage and car and cycle parking.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>The applicant</th>
</tr>
</thead>
<tbody>
<tr>
<td>The applicant is Southern Housing Group and the architect is KKM Architects.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Strategic issues</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Land use</strong>: Development of this underutilised brownfield site for residential use is supported. Full justification for the loss of the existing public house should be provided and consideration given to the provision of a replacement public house or appropriate community facility (paras 16-17).</td>
</tr>
<tr>
<td><strong>Housing</strong>: Delivery of 181 residential units across a mix of unit sizes and tenures is supported. The proposed affordable housing provision of 37% by habitable room is supported. Further details of affordability of the rented and intermediate products should be provided (paras 18-27).</td>
</tr>
<tr>
<td><strong>Urban design/Inclusive design</strong>: The development is supported in design terms subject to provision of step free access to the main entrances (paras 28-33).</td>
</tr>
<tr>
<td><strong>Transport</strong>: Development unlikely to have significant transport impacts. Detailed issues relating to impact on TLRN and cycle parking (paras 40-46).</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Recommendation</th>
</tr>
</thead>
<tbody>
<tr>
<td>That Redbridge Council be advised that while the application is generally acceptable in strategic planning terms the application does not comply with the London Plan, for the reasons set out in paragraph 51 but that the possible remedies set out in that paragraph could address these deficiencies.</td>
</tr>
</tbody>
</table>
Context

1 On 22 March 2017 the Mayor of London received documents from Redbridge Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor has until 3 May 2017 to provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor’s use in deciding what decision to make.

2 The application is referable under Categories 1A and 1C of the Schedule to the Order 2008:

1A “Development which comprises or includes the provision of more than 150 houses, flats or houses and flats”;

1C “Development which comprises or includes the erection of a building of one or more of the following descriptions – the building is more than 30 metres high and is outside the City of London”.

3 Once the Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision, as to whether to direct refusal; take it over for his own determination; or allow the Council to determine it itself.

4 The Mayor of London’s statement on this case will be made available on the GLA website www.london.gov.uk.

Site description

5 The site is located in the Newbury ward of the London Borough of Redbridge and extends to 0.4 hectares. The site is bounded by Eastern Avenue (A12) to the north-west, Brook Road to the east and Hertford Road to the south. The eastern half of the site is occupied by The Avenue Public House and associated parking and servicing. The western half of the site was previously occupied by Trust Ford Motors as a car showroom and sales lot. This part of the site is predominantly open forecourt with a single storey sales unit located close to Hertford Road.

6 There are no site specific allocation related to the site within the current adopted development plan. However, the site is identified within a Key Retail Parade in the Redbridge Local Plan 2015-2030: Pre-Submission Draft, which it is expected will be adopted later in 2017.

7 Immediately adjacent to the site to the west is the seven-storey building Newbury House. To the south and east the existing buildings along Hertford Road and Brook Street are primarily single and two-storey houses. On the opposite site of Eastern Avenue the scale increases with two storeys of residential accommodation located over a parade of shops in addition to the recent 7/8 storey developments on Monarch Way.

8 The site is approximately 500m walk south of Newbury Park London Underground Station served by the Central Line. The nearest bus stops to the site are situated on Eastern Avenue near the junction with Oaks Lane, at a distance of 130m. The stops provide access to the 66, 296 and 396 bus services.

9 The site records a public transport accessibility level (PTAL) of 3 on a scale of 1-6b, where 6b is the highest. The nearest section of the Transport for London Road (TLRN) is the A12. The nearest section of the Strategic Road Network (SRN) is the A118 which is 1.2km south of the site.
Details of the proposal

Planning permission is sought for the demolition of existing buildings on site and the erection of part two, part six, part seven, part eight, and part twelve storey block containing 181 (67x1, 90x2 and 24x3 bedroom) residential units with associated access, amenity space, landscaping, refuse storage and car and cycle parking. 65 car parking spaces are provided in an undercroft car park accessed from Brook Road with a further 2 blue badge holder spaces provided on the carriageway of Hertford Road.

Case history

GLA officers hosted a pre-application meeting with the applicant in July 2016. The principle of development and the approach to scale, massing and design was supported. The pre-application proposals included the re-provision of the A4 use, which was supported. The applicant’s position on affordable housing was not clarified at that stage.

There is no relevant planning history related directly to the site itself.

Strategic planning issues and relevant policies and guidance

The relevant issues and corresponding policies are as follows:

- Principle of development: London Plan; Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG; Shaping Neighbourhoods: Character and Context SPG; Draft Affordable Housing and Viability SPG;
- Housing: London Plan; Shaping Neighbourhoods: Character and Context, draft SPG; Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG;
- Urban design: London Plan; Shaping Neighbourhoods: Character and Context, draft SPG;
- Inclusive design: London Plan; Accessible London SPG
• Sustainable development  
  London Plan; Mayor’s Climate Change Adaptation Strategy; 
  Mayor’s Climate Change Mitigation and Energy Strategy; 

• Transport  
  London Plan; the Mayor’s Transport Strategy;

14 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the 
development plan in force for the area is the Redbridge Core Strategy DPD (2008); Borough Wide 
Primary Policies DPD (2008); Development Sites with Housing Capacity DPD (2008); Borough 
Wide Primary Policies DPD (2008); Development Sites with Housing Capacity DPD (2008); and the 
London Plan 2016 (The Spatial Development Strategy for London Consolidated with Alterations 
since 2011).

15 The following are also relevant material considerations:

• The Redbridge Local Plan 2015-2030: Pre-Submission Draft (July 2016);

• The National Planning Policy Framework and Technical Guide to the National Planning 
Policy Framework.

Land use

16 London Plan Policy 3.3 identifies the pressing need for more homes in London. The existing 
uses include a public house and car showroom and sales lot and the site is largely dominated by car 
parking and hardstanding. In principle the redevelopment of this underutilised brownfield site to 
provide residential accommodation is supported in accordance with London Plan Policy 3.3.

17 London Plan Policy 4.8 promotes a proactive approach to planning for retailing and related 
services. That includes developing policies to prevent the loss of valued local community assets 
including public houses. The site contains The Avenue Pub (Use Class A4). The public house is not 
identified as an asset of community value and the current premises represent an inefficient use of 
the land. As such there is no objection in principle to the redevelopment of the public house. 
However, at pre-application stage the proposals included the re-provision of the A4 use in a 
commercial unit on the corner of Eastern Avenue and Brook Street. The application contains 
limited justification for the loss of the public house use and the applicant is requested to either 
amend the proposal to include a replacement public house or alternative community facility if 
appropriate, or alternatively provide a full justification for its loss in order to ensure that the 
proposal complies with London Plan Policy 4.8.

Housing

18 London Plan Policy 3.3 identifies the pressing need for more homes in London, setting a 
London-wide housing delivery target of 42,389 additional homes per year up to 2021. Redbridge’s 
annual average housing target is 1,123 additional homes per year between 2015 and 2025. The 
proposed development would provide 181 residential units, equivalent to 16% of the Boroughs 
annual housing target.
The proposed housing mix is summarised below:

<table>
<thead>
<tr>
<th>Unit size</th>
<th>Market</th>
<th>Affordable Rent</th>
<th>Intermediate (shared ownership)</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 bedroom</td>
<td>49</td>
<td>5</td>
<td>13</td>
<td>67</td>
</tr>
<tr>
<td>2 bedroom</td>
<td>59</td>
<td>9</td>
<td>22</td>
<td>90</td>
</tr>
<tr>
<td>3 bedroom</td>
<td>10</td>
<td>10</td>
<td>4</td>
<td>24</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>118</strong></td>
<td><strong>24</strong></td>
<td><strong>39</strong></td>
<td><strong>181</strong></td>
</tr>
</tbody>
</table>

**Affordable housing**

London Plan Policies 3.11 and 3.12 require the maximum reasonable amount of affordable housing to be delivered in all residential developments above ten units. Policy 3.11 sets a strategic target of 60% of the affordable housing offer to be for social or affordable rent and 40% for intermediate or rent or sale. The Redbridge Core Strategy seeks to achieve a target of 50% affordable housing on relevant developments. However, the draft Local Plan seeks to achieve a target of 30% affordable housing on relevant developments. Consistent with the London Plan both documents seek to achieve a tenure split of 60% social/affordable rent and 40% intermediate. Further guidance is provided in the Mayor’s emerging draft Affordable Housing and Viability SPG, which sets out a threshold approach based on a 35% minimum target.

As currently presented the proposed development would deliver 37% affordable housing by habitable room, which is welcomed. The proposed tenure split is 42% affordable rent to 58% intermediate by habitable room. London Plan Policy 3.11 provides flexibility on tenure split to meet local needs and as set out in the draft SPG the Mayor is keen to maintain this flexibility to meet local needs while ensuring the delivery of his preferred affordable products. The applicant should provide further details of the affordability of rented, intermediate and shared ownership affordable units with analysis against a range of criteria including market rates, London Living Rent and average household incomes ranges.

A financial viability assessment (FVA) has been submitted in support of the application, which has been reviewed by an independent external consultant on behalf of the Council and by the GLA’s own viability team. Whilst the FVA, which is based on 100% market housing, indicates that the proposed affordable housing provision is not viable, Southern Housing Group has committed to providing the minimum threshold amount, which is welcomed. Further details on how the development will be funded and how it relates to Southern Housing Group’s wider programme should be provided. If the threshold amount is being provided without grant, the applicant should investigate whether the proportion of affordable housing can be increased to a level of 40% or more with grant. GLA officers will work with the applicant and the Council to maximise the delivery of affordable housing.

In accordance with the draft SPG an early review mechanism should be secured in the section 106 legal agreement, which will be triggered if an agreed level of progress on implementation is not made within two years of the permission being granted.
Housing choice

24 London Plan Policy 3.8 together with the Mayor’s Housing SPG seeks to promote housing choice and seek a balanced mix of unit sizes, with a particular focus on family homes. The submission confirms that a range of unit sizes, including family sized units, would be provided across the scheme, and within the affordable units which is supported in accordance with London Plan Policy 3.8.

Children’s play space

25 The approximate number of children predicted to live in the developments based on the Mayor’s Shaping Neighbourhoods: Play and Informal Recreation SPG has been calculated for the proposals as presented. In total 36 children are predicted to live at the proposed development, which results in a play space requirement of 178sq.m. This requirement is subject to change and the applicant should confirm the final requirement once the tenure mix is agreed. Potential children’s play space has been identified in the communal amenity area, which is welcome. However, the applicant should provide further details of the proposed play strategy including the amount of on-site play space provision and how provision will be provided for different age groups in accordance with the SPG.

Residential density

26 Policy 3.4 of the London Plan states that housing output should be optimised taking into account, amongst other things, the design principles of the London Plan and the content of the Housing SPG. The site has a PTAL level of 3 and is urban in character. On this basis the London Plan Density matrix (Table 3.2 in support of London Plan Policy 3.4) suggests a residential density of between 200-450 habitable rooms per hectare. The scheme delivers a site density of 1250 habitable rooms per hectare and therefore exceeds the relevant density range. However, the supporting text of London Plan Policy 3.4 confirms that the density matrix should not be applied mechanistically and as discussed further in the following sections the development responds to local context, provides open space and play space, and does not adversely impact upon transport capacity. As such the proposed residential density is supported in accordance with London Plan Policy 3.4.

Residential quality

27 London Plan Policy 3.5 promotes quality in new housing provision and sets out minimum space standards at Table 3.3. As of 1 October 2015 the Government’s technical housing standards came into effect, and these have been adopted through a minor alteration to the London Plan. All units meet the minimum space standards and amenity space standards. The development has been designed with the consideration to the design process within the Mayor’s Housing SPG. The layout of the development enables good quality residential accommodation. All units overlooking Eastern Avenue have a secondary aspect onto the communal amenity space to the rear, thereby avoiding north facing single aspect units overlooking a busy road. Generally the proportion of dual aspect units is high. Ground floor units on Hertford Road are provided with private entrances in response to the more domestic context. Overall, the standard of residential quality is high, which is supported in accordance with London Plan Policy 3.5.
Urban design

28 The proposed layout responds to the sites roughly triangular shape with blocks wrapping around to create three street frontages and a central courtyard. The Hertford Street block does not extend along the full frontage due to the tapering depth of the site. Vehicular access directly down to the undercroft car parking area is provided off Brook Road. The general layout arrangement of the proposed development is supported.

29 The proposed development is separated into five individual cores. The core arrangement limits the number of units per core and provides activity along Eastern Avenue. Private entrances are provided to the ground floor units on Hertford Road. The layout enables a high proportion of dual aspect units, with no north facing single aspect units. Communal amenity space is provided within a central podium courtyard and fronting onto Hertford Road. Generally the layout provides for good quality residential accommodation, which is supported.

30 The site slopes from its northwest corner down to its southeast corner with the corner of Brook Road and Hertford Road approximately 1 metre lower than the level of Eastern Avenue. Undercroft car parking is provided at lower ground floor with lightwells for natural ventilation and light. As a result the main core entrances located at upper ground floor on Eastern Avenue are provided with stepped access with step free access provided only via the secondary core entrances from the communal amenity space to the rear, which is unacceptable. The applicant should revise the proposals to provide step free access via the main residential entrances.

31 The scheme proposes a twelve storey element on the corner of Eastern Avenue and Brook Road, stepping down to eight and then seven storeys on the Eastern Avenue frontage. On Brook Road the development steps down to six storeys then four storeys on the corner with Hertford Road and three storeys on the Hertford Road frontage. The concentration of height on Eastern Avenue with a taller element to mark the corner is supported. Although tall within the context of the predominant surrounding building heights, the development responds to a larger urban grain created by the wide Eastern Avenue and provides a barrier from noise and pollution for the amenity spaces to the rear. The development steps down along Brook Road providing a transition to the more domestic scale of the residential areas to the south. Overall, the height of the proposed development responds well to its context and is supported.

32 Following pre-application discussions the roofline and massing elements of the development has been simplified, which is welcomed. Setback elements reinforce the changes in height to define distinct massing elements. The principal cladding material is brick along Eastern Avenue and the elevations are composed of a strong and well proportioned brick grid with openings arranged in recessed two and three storey bays to mediate the scale of the elevations. Notwithstanding the stepped access the entrances on Eastern Avenue are well detailed, attractive and legible. Projecting balconies are introduced to courtyard elevations and along Brook Road and Hertford Road. Overall, the architectures and materiality of the proposed development is of a high quality, which is supported.

Inclusive design

33 The aim of London Plan Policy 7.2 is to ensure that proposals achieve the highest standards of accessibility and inclusion. 18 No. fully accessible Building Regulation Part M4(3) compliant units are proposed. This equates to 10% of the proposed units. The remaining 90% of units will be Building Regulation Part M4(2) compliant. The fully accessible units, as requested have been located within the different cores and tenures including Cores A, B, C and E. As noted above stepped access is provided to the cores from Eastern Avenue with step free access provided from Hertford Road via the communal amenity space. This approach is not considered appropriate to the
principles of inclusive design and the applicant should revise the scheme to eliminate stepped access to the main entrances to ensure compliance with London Plan Policy 7.2.

**Noise**

34 London Plan Policy 7.15 seeks to separate noise sensitive development from major noise sources. Where this is not possible any potential adverse effects should be controlled and mitigated through the application of good acoustic design principles. Given the sites location on a major road, Eastern Avenue, an environmental noise survey and noise impact assessment report has been submitted in support of the application. The proposed development situates external amenity areas behind the main blocks on Eastern Avenue, which provides a barrier to road noise. The environmental noise impact upon the proposed dwellings can be addressed through mitigation to provide a suitable internal environment. Subject to the mitigation measures recommended in the submitted report being secured by condition the development is supported in accordance with London Plan Policy 7.15.

**Air quality**

35 London Plan Policy 7.14 requires proposals to minimise increased exposure to existing poor air quality – proposals should be air quality neutral and should lead to further deterioration of existing poor air quality. The Council has declared the whole Borough an Air Quality Management Area (AQMA) – areas where the national air quality objectives have been shown to not be achieved. As such an air quality assessment has been submitted in support of the application.

36 An air quality neutral assessment has been conducted. In summary, building emissions are in line with benchmarked emissions. However, transport emissions of the proposed development exceed the benchmarked emissions. Mitigating actions are therefore recommended to be put into place in the form of a travel plan in order to meet the emissions benchmark. It is anticipated with mitigation in place, transport emissions would unlikely be an issue. As such the proposed development is supported in accordance with London Plan Policy 7.14.

**Sustainable development**

*Minimising carbon dioxide emissions*

37 The applicant has broadly followed the energy hierarchy in the London Plan. At this stage, GLA energy officers have requested further revisions and information from the applicant in order to ensure compliance with London Plan policy 5.2. Outstanding items relate to overheating and cooling requirements, centralised heating and carbon reductions from renewable energy sources. Full details of the further information required has been provided direct to the applicant. An update will be given at Stage 2.

*Flood risk management and sustainable drainage*

38 The site is within Flood Zone 1 and is <1ha, therefore no flood risk assessment is required. According to the online EA maps, the site is at very low risk of surface water flooding. Therefore the proposals are acceptable in terms of London Plan Policy 5.12.

39 A surface water drainage strategy has been submitted in support of the application, which states that surface water run–off will be reduced to near greenfield run–off rates. However, further information and revisions are required in relation to the method of calculation for run–off rates and attenuation volumes to ensure compliance with London Plan Policy 5.13. Full details of the further information required has been provided direct to the applicant. An update will be given at Stage 2.
Transportation

40 The number of additional trips generated by the proposed development is unlikely to have a significant impact across the transport network. Given the site location, there are no site specific capacity concerns with any particular bus or rail route.

41 The proposal to close the existing vehicular access from Eastern Avenue and create a new access on Brook Road whilst closing the existing access on Brook Road and widening the footpath is supported. Discussions are ongoing with the applicant to agree revisions to address the issue of oversails on the public highway and on TfL owned land.

42 The low car parking provision (0.36 ratio) is supported and an obligation in the section 106 legal agreement should ensure residents are not eligible for local on-street parking permits. The inclusion of 16 blue badge parking spaces within the site plus 2 additional spaces located on Hertford Road (ensuring their proximity to the wheelchair accessible units) is supported. Blue badge parking should be secured by condition along with electric vehicle charging points and a car parking management plan in accordance with London Plan standards.

43 The proposed 303 cycle parking spaces for the development meets the London Plan cycle parking minimum standards. The location of short stay spaces and how they will be incorporated into the proposed public realm improvements should be provided prior to re-consultation stage. Confirmation should also be provided that the type of cycle parking proposed conforms to that of the London Cycling Design Standards (LCDS), including at least 5% of spaces able to accommodate larger cycles and also those which may be adapted. The cycle parking spaces and details should be secured by condition.

44 A framework travel plan, construction logistics plan and delivery and servicing plan have been submitted, which is welcomed. A full travel plan should be secured, enforced, monitored and reviewed as part of the section 106 legal agreement. A full construction logistics plan and delivery servicing plan should be secured by condition.

45 In accordance with London Plan policy 8.3, Community Infrastructure Levy, the Mayor commenced CIL charging for developments permitted on or after 1 April 2012. It is noted that the proposed development is within the London Borough of Redbridge, where the Mayoral charge is £20 per square metre Gross Internal Area (GIA). Further details can be found at: http://www.london.gov.uk/publication/mayoral-community-infrastructure-levy

46 Additionally, the mechanism for contributions to be made payable towards Crossrail has been set out in the Mayor’s Supplementary Planning Guidance (SPG) ‘Use of planning obligations in the funding of Crossrail and the Mayoral Community Infrastructure Levy’ (April 2013) and London Plan policies 6.5 and 8.3.

Local planning authority’s position

48 The local planning authority is supportive in principle of the proposed redevelopment but is seeking further information and revisions in respect to various detailed matters. A committee date in June or July is being targeted.
Legal considerations

Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 of the Order to refuse the application, or issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application and any connected application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor’s statement and comments.

Financial considerations

There are no financial considerations at this stage.

Conclusion

London Plan policies on land use principles, housing and affordable housing, urban design, housing quality, inclusive access, climate change and transport are relevant to this application. In general, the application complies with these policies, however, further discussion is needed on the following points prior to referring the application back to the Mayor:

- **Land use:** Development of this underutilised brownfield site for residential use is supported. Full justification for the loss of the existing public house should be provided and consideration given to the provision of a replacement public house or appropriate community facility.

- **Housing:** Delivery of 181 residential units across a mix of unit sizes and tenures is supported. The proposed affordable housing provision of 37% by habitable room is supported. Further details of tenure and funding required.

- **Urban design/Inclusive design:** The development is supported in design terms subject to provision of step free access to the main entrances.

- **Sustainable development:** Further information required relating to overheating and cooling requirements, centralised heating and carbon reductions from renewable energy sources. Further information and revisions required in relation to the surface water drainage strategy.

- **Transportation:** Continued discussions required in relation to the impact on the TLRN. Detailed issues relating to the cycle parking element. A construction logistics plan, delivery and servicing plan and travel plan should all be secured by condition or through the s106 agreement.

for further information, contact GLA Planning Unit (Development & Projects Team):

Colin Wilson, Senior Manager – Development & Projects
020 7983 4783    email colin.wilson@london.gov.uk

Sarah Considine, Strategic Planning Manager (Development Decisions)
020 7983 5751    email sarah.considine@london.gov.uk

Russell Smith, Case Officer
020 7983 4782 email    russell.smith1@london.gov.uk