

planning report GLA/5391/01

10 February 2020

587-595, High Road, Seven Kings, Ilford

in the London Borough of Redbridge

planning application no. 4417/19

Strategic planning application stage 1 referral

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.

The proposal

Demolition of existing buildings and erection of a 10-storey building comprising of 50 flats and ground floor commercial floorspace.

The applicant

The applicant is **The Parham Finance Co. Ltd** and the architect is **Ackroyd Lowrie**.

Strategic issues summary

Principle of development: The proposed residential-led redevelopment of the locally designated Mixed-Use Opportunity site is supported in strategic terms, subject to satisfying the Council's recommendation for replacement employment floorspace and demonstrating compliance with agent of change principles (paragraphs 13-15).

Affordable housing: The quantum (15%) and mono-tenure nature of the proposed affordable housing is wholly unacceptable. GLA officers will seek improvement to the quantum and affordability of the affordable housing and will robustly interrogate the financial viability assessment to ensure that the maximum amount of affordable housing, with an appropriate affordable tenure mix, is secured (paragraphs 17-22).

Urban and inclusive design: No harm would be caused to nearby Grade II listed Former Cauliflower Hotel. Further work relating to improving the scheme's residential quality is required (paragraphs 23-31).

Environment: Further information on the energy strategy is required. (paragraphs 32-35).

Transport: Subject to the requested conditions, Healthy Streets (cycling) improvement and submission of an acceptably detailed cycle parking design plan, the proposals are acceptable in strategic terms (paragraphs 36-41).

Recommendation

That Redbridge Council be advised that the application does not fully comply with the London Plan and the Mayor's intend to publish London Plan for the reasons set out in paragraph 45 of this report. However, the resolution of these issues could lead to the application becoming compliant with the London Plan and the Mayor's intend to publish London Plan.

Context

1 On 17 December 2019, 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 must provide the Council with a statement setting out whether he considers that the application complies with the London Plan and draft 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 Category 1C of the Mayor of London Order 2008:

- **Category 1C:** *“Development which comprises or includes the erection of a building of (c) more than 30 metres high and is outside the City of London.”*

3 Once Redbridge 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 application site is approximately 0.06 hectares and is located at 587-595 High Road, Seven Kings, Ilford. The site is bounded to the north by the Great Eastern Main Line, to the west by a Halfords Autocentre and to the east by a car showroom. It was previously occupied by a petrol station but has been used as a mixed car valet centre and car wash for the last 10 years.

6 The site, along with numbers 573-585, 597-601 and 603 High Road, is within the designated Mixed Use Opportunity Site (No. 81) in the Local Plan. It is not within a conservation area and there are no listed heritage assets on the site; however, the Grade II listed Former Cauliflower Hotel is approximately 150 metres to the west of the site.

7 The site is accessed from High Road (A118), which is part of the Strategic Road Network. The North Circular (A406), the nearest part of the Transport for London Road Network, is over 1 kilometre away. Seven Kings rail station is 350 metres to the east and is currently served by TfL Rail, with the Elizabeth Line (Crossrail) expected in the future. One bus route (86/N86) has stops within 150 metres on High Road and three day-time services stop on Green Lane about 500 metres away—routes 128, 150 and 679. Consequently, the site has a public transport accessibility level (PTAL) of 3, on a scale of 0-6b where 6b is the highest.

Details of the proposal

8 The applicant proposes to demolish the existing buildings and redevelop the site to provide a residential-led mixed-use development, involving the erection of a 10-storey building, comprising: 50 new residential units; 92 sq.m. of business/community use floorspace; 86 residential cycle parking spaces and 3 Sheffield stands for larger bicycles and visitors; and, associated amenity spaces.

Case history

9 There is no relevant strategic planning history for this site.

Strategic planning issues and relevant policies and guidance

10 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is Redbridge's Local Plan (March 2018), and the London Plan 2016 (Consolidated with Alterations since 2011).

11 The relevant issues and corresponding policies are as follows:

- Principle of development *London Plan;*
- Employment land *London Plan; Land for Industry and Transport SPG;*
- Housing *London Plan; Housing SPG; Housing Strategy; Shaping Neighbourhoods: Play and Informal Recreation SPG; Shaping Neighbourhoods: Character and Context SPG;*
- Affordable housing *London Plan; Housing SPG; Housing Strategy; Mayor's Affordable Housing and Viability SPG;*
- Urban design *London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG;*
- Inclusive design *London Plan; Accessible London: Achieving an Inclusive Environment SPG;*
- Environment *London Plan; Sustainable Design and Construction SPG; Mayor's Environment Strategy;*
- Transport *London Plan; Mayor's Transport Strategy.*

12 The following are relevant material considerations:

- The National Planning Policy Framework and National Planning Practice Guidance; and,
- The London Plan - intend to publish version (December 2019), which should be considered on the basis described in the NPPF.

Principle of development

13 The site is non-designated employment land in a former industrial use. Policy E7C of the Mayor's intend to publish London Plan sets out the below scenarios where mixed-use or residential developments on non-designated industrial sites should be supported:

- there is no reasonable prospect of the site being used for the industrial and related purposes set out in Part A of Policy E4 Land for industry, logistics and services to support London’s economic function; or,
- it has been allocated in an adopted local development plan document for residential or mixed-use development; or,
- industrial, storage or distribution floorspace is provided as part of mixed-use intensification.

14 The application site forms part of Opportunity Site 81 in the Redbridge Local Plan, which is allocated for residential/employment use. The proposal would deliver a residential-led mixed use development, comprised of new homes and office or social infrastructure, which broadly accords with the local development plan’s site allocation. The redevelopment of this site for the intended land uses is therefore considered appropriate in this instance, in line with Policy E7C of the Mayor’s intend to publish London Plan.

15 Notwithstanding this, the applicant must satisfy the Council’s recommendation for replacement employment floorspace and demonstrate that the industrial and related activities in the surrounding area would not be compromised in terms of their continued efficient functioning in line with Policies D13 and E7 of the Mayor’s intend to publish London Plan. Issues in relation to fire safety, access and servicing, design quality, noise, vibration and air quality must be fully assessed and robust mitigation measures specified, where necessary, to ensure that industrial and residential uses co-exist.

Housing

16 London Plan Policy 3.3 and Policy H1 of the Mayor’s intend to publish London Plan in seeking to increase the supply of housing in London, set borough housing targets. The Mayor’s intend to publish London Plan sets a target of 14,090 new homes for the period 2019 to 2028 in Table 4.1 for the London Borough of Redbridge. The scheme would deliver 50 new homes, which would contribute to this target and is supported in principle. The proposed housing mix is set out below:

tenure	1-Bed	2-Bed	total units	total hr	hr %
private	32	11	43	97	85%
shared ownership	4	3	7	17	15%
total	36	14	50	114	100%

Affordable housing

17 London Plan Policies 3.11 and 3.12 and Policy H4 of the Mayor’s intend to publish London Plan seek to maximise the delivery of affordable housing, with the Mayor setting a strategic target of 50%. Policy H6 of the Mayor’s intend to publish London Plan provides a flexibly prescribed tenure mix of: 30% social rent/London Affordable Rent; 30% intermediate products; and, 40% to be determined by the relevant borough as low cost rented homes or intermediate products. Locally, the Redbridge Local Plan expects at least 35% affordable housing provision on this site.

18 Policy H5 of the Mayor's intend to publish London Plan and the Mayor's Affordable Housing and Viability SPG set out a 'threshold approach', whereby schemes meeting or exceeding a specific percentage of affordable housing by habitable room, without public subsidy, and other criteria such as tenure mix are eligible for the Fast Track Route (FTR). Such applications are not required to submit viability information to the GLA and are also exempted from a late stage review mechanism. On industrial land considered suitable for release, where redevelopment would result in net loss of industrial capacity, a minimum of 50% affordable housing by habitable room must be provided to be eligible for the FTR.

19 The scheme is currently proposing 15% affordable housing by habitable room (without public subsidy), comprised wholly of shared ownership units. This level, and mono-tenure nature, of the proposed affordable housing is wholly unacceptable, and GLA officers will seek an increase in the quantum and affordability of the affordable housing as the scheme progresses. The scheme does not qualify for the FTR in accordance with the Mayor's intend to publish London Plan. A viability assessment has been submitted, and GLA officers are robustly interrogating this, as well as the Council's independent assessment when received, to ensure that the maximum amount of affordable housing, with an appropriate affordable tenure mix, is secured. Early implementation and late stage review mechanisms will be required in accordance with Policy H5 of the Mayor's intend to publish London Plan and to optimise affordable housing delivery in accordance with strategic policy objectives.

20 Should the application deliver 50% affordable housing, with an acceptable tenure mix, a late stage review would not be required. The applicant should also investigate the use of grant funding to increase the affordable housing provision and engage with a Registered Provider. In accordance with the Mayor's Affordable Housing and Viability SPG and the Mayor's intend to publish London Plan, the Council has published the financial viability assessment to ensure transparency of information. Any independent reviews or revised assessments must also be published.

21 The applicant should note that London Affordable Rent and Shared Ownership and London Living Rent are the Mayor's preferred affordable rent and intermediate rent products respectively. It should also be noted that London Affordable Rent is equivalent to social rent levels. Intermediate products should be provided in line with the household income cap and affordability eligibility criteria for intermediate products set out in the London Plan and draft London Plan and the Mayor's Affordable Homes Programme Funding Guidance. It is expected that intermediate units are made available to a range of maximum household income thresholds below the maximum £90k or £60k income cap threshold referred to above.

22 Lastly, a draft of the Section 106 agreement must be provided to the GLA for review as soon as one is available to ensure that the review mechanisms and affordability have been secured and the eligibility criteria for the intermediate units comply with the London Plan, Mayor's intend to publish London Plan and the Mayor's Affordable Homes Programme Funding Guidance.

Heritage and urban design

Heritage

23 The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the tests for dealing with heritage assets in planning decisions. In relation to listed buildings, all planning decisions should “*have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses*”. The NPPF states that when considering the impact of the proposal on the significance of a designated heritage asset, great weight should be given to the asset’s conservation and the more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting.

24 As indicated in paragraph 6 of this report, the Grade II listed Former Cauliflower Hotel is approximately 150 metres away to the west on the same side of High Road as the application site. Based on the tall buildings analysis contained in the design and access statement supporting the application, the proposal would form part of an urban block and be sandwiched between two buildings that are taller and therefore would not be visible in the setting of the listed building given its location along the High Road in relation to the listed building. Having regard to the statutory duties in respect of listed buildings in the Planning (Listed Buildings and Conservation Areas) Act 1990, and the relevant paragraphs in the NPPF, GLA officers consider that the proposed development would not cause harm to the setting of the nearby heritage asset given the proposal’s height and siting in relation to the listed building.

Density

25 The net residential density for the proposed development is approximately 1,965 habitable rooms and 862 units per hectare respectively, which exceeds the guidance range of 300-650 habitable rooms and 65-240 units per hectare as set out in Table 3.2 of the London Plan for sites with a PTAL of 3 and a central character setting. The net residential density for the proposed development also exceeds the thresholds for increased scrutiny of design quality set out in the Mayor’s intend to publish London Plan. Given the location of the site within the Crossrail Growth and Investment Corridor, transport accessibility and optimisation of land use to deliver housing, the increased density on this site could be supported if the delivery of affordable housing is maximised and the Mayor’s intend to publish London Plan agent of change principles are followed. In line with Policy D4 of the Mayor’s intend to publish London Plan, a management plan detailing day-to-day servicing and delivery arrangements and long-term maintenance implications, as detailed in paragraph 3.4.9, will be required if the density is supported. The agreed maintenance plan should be secured by condition as part of any permission.

Layout and massing

26 The scheme is laid out with commercial space, communal play space and servicing/vehicular access/parking at ground level and residential units and additional play space on upper floors. The commercial space partially activates High Road and the play space is located to the rear of the site just across from the railway tracks. On the adjacent sites, parking and servicing are proposed to the rear. Given this and to ensure that the play space is of the highest quality in terms of noise and air quality, the removal of the play space from ground level should be strongly considered. This would facilitate

the relocation of parking and bin storage to the rear of the site and further activation of the frontage along High Road through the introduction of additional commercial floorspace or residential units.

27 The approach to massing and height is supported. The articulation of the building continues a rhythm of vertical elements in keeping with the emerging trend on the adjacent sites. This helps to avoid the perception that the individual buildings across each site is a continuous wall of development from street level.

Residential quality

28 All units would meet the London Plan and the Mayor's intend to publish London Plan and the Mayor's Housing SPG internal space standards. There would also be efficient cores in line with the Mayor's Housing SPG and each of the proposed units would have access to private amenity space in the form of balconies. The applicant should, however, confirm that the floor to ceiling height is at least 2.5 metres and the single aspect units with balconies facing directly on to the rail track should be designed out from the scheme.

29 In accordance with London Plan Policy 3.6 and Policy S4 of the Mayor's intend to publish London Plan, development proposals that include housing should provide play space for children based on the short and long-term needs of the expected child population generated by the scheme. The quantum of play space required, using the GLA's 2019 child play space calculator, is 92 sq.m. with 52 sq.m. required for under 5s. A total of approximately 164 sq.m. of on-site communal play space is proposed at ground floor level to the rear of the site and two locations on the sixth floor. As discussed earlier in this report, the location of the play space at ground floor level should be reconsidered. The applicant must also demonstrate that any play space proposed would not be segregated by tenure; this is to ensure compliance with Policy S4 of the Mayor's intend to publish London Plan. The Council should ensure that the proposed play space is inclusive in design, include diverse play elements, accessible and safe.

30 The proposal also responds positively to London Plan Policy 3.8 and Policy D7 of the Mayor's intend to publish London Plan and meets Building Regulation requirement M4 (2) 'accessible and adaptable dwellings' and Building Regulation requirement M4 (3) 'wheelchair user dwellings'. This should be secured in the Section 106 agreement. To ensure the safety of future occupants, a fire strategy produced by a suitably qualified third-party assessor should be secured in accordance with Policy D12 of the Mayor's intend to publish London Plan.

Appearance

31 The use of brick is welcomed, as it is consistent with the emerging context and as such would respond positively to its future setting. The Council's planning officers should seek to secure key details including facing materials and depth of window reveals.

Environment

32 Full details of the outstanding issues relating to environment have been provided directly to the applicant and Council.

Energy strategy

33 The applicant has submitted an energy assessment in accordance with London Plan Policy 5.2 and Policy SI2 the Mayor's intend to publish London Plan. The on-site reduction in regulated emissions compared to a 2013 Building Regulations compliant development for the domestic element is 27 tonnes of CO₂ per year and an overall saving of 58%, which does not meet the required zero carbon target. For the non-domestic element, a reduction of 2 tonnes of CO₂ per year and an overall saving of 57% is expected. Further information on the proposed heat pumps and the potential to connect to district heating and future-proofing is required. The applicant should also submit the GLA spreadsheet; re-assess the Be Lean case; model the dynamic overheating to CIBSE TM59; and, provide PV as part of the strategy. A contribution to the Council's carbon-offset fund is to be confirmed.

Flood risk, sustainable drainage and water efficiency

34 The site is located within Flood Zone 1 and at a low risk of flooding from all sources. Regarding sustainable drainage, underground attenuation tanks and a green roof have been proposed with an appropriate maintenance plan. This approach satisfies the requirements of London Plan Policy 5.13 and Policy SI13 of the Mayor's intend to publish London Plan. The sustainability statement proposes a maximum indoor water consumption of 105 l/person/day for the dwellings, in line with the optional standard in Part G of the Building Regulations and compliant with Policy 5.15 of the London Plan and Policy SI5 of the Mayor's intend to publish London Plan.

Urban greening

35 In line with London Plan Policy 5.10 and Policies G1 and G5 of the Mayor's intend to publish London Plan, urban greening should be embedded as a fundamental element of site and building design. The Urban Greening Factor of the proposal should be calculated and submitted prior to the Mayor's decision-making stage.

Transport

Cycling and walking

36 Although the Design and Access Statement (DAS) submitted with the application covers most transport matters, the absence of a transport assessment prevents a robust analysis of connectivity. The DAS identifies frontage marked "dangerous" for cyclists but no recommendations to improve these conditions have been provided. In line with healthy streets Policies T2, T4 and T5 of the Mayor's intend to publish London Plan, the applicant should provide recommendations to improve the cycling environment, and the delivery of identified measures should be secured in any planning permission. Given that the development would generate cycling trips, it is reasonable to expect a contribution towards safer and more attractive cycling infrastructure on the High Road either through a S278 agreement with the Council (the Highway Authority) and/or the Section 106 agreement. Further discussion is required on these matters before the Mayor's final determination.

Car and cycle parking

37 Cycle parking for both uses meets quantitative standards for long, short-stay and cargo (larger) spaces and includes an appropriate proportion of easy-to-use Sheffield stands. A detailed plan clearly demonstrating these features should be submitted prior to the Mayor making his final determination.

38 The development would be car-free apart from two on-site Blue Badge spaces, acceptably designed and unaffected by the swept path of a refuse lorry pulling off the highway. The details of the on-site access and management arrangements for these and shared servicing should be set out in a parking design and management plan (including EVCP provision) and secured by planning condition. The issue of parking permits for the two adjoining controlled parking zones (CPZ) should be restricted and secured via the Section 106 agreement.

Impacts

39 The proposed removal of the existing two wide accesses and their replacement with one would have a positive impact on the safety of cyclists and pedestrians. Compared with the previous car-valeting use, vehicular trips would be much lower and no significant strategic highway impacts are anticipated. However, given the reliance of this car-free development on other modes, and due to the opportunities in this fast-changing area, enhancing the local cycling and walking network and facilities is important. Given the scale and nature of the development, no significant impact to the public transport capacity is anticipated.

40 TfL has [train] running rights on the far side of the tracks but the site is adjacent to Network Rail assets and operations; therefore, comments relating to infrastructure protection should be sought from Network Rail.

Freight

41 The Council should determine the acceptability of the refuse proposals and consider applying conditions for a servicing management plan and a construction logistics management plan.

Local planning authority's position

42 Redbridge Council planning officers are currently assessing the application. At this stage a committee date is still to be confirmed.

Legal considerations

43 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. 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

44 There are no financial considerations at this stage.

Conclusion

45 London Plan and the Mayor's intend to publish London Plan policies on employment land, housing, affordable housing, heritage, urban and inclusive design, environment and transport are relevant to this application. The application does not fully comply with the London Plan and the Mayor's intend to publish London Plan. The following changes might, however, lead to the application becoming compliant with the London Plan and the Mayor's intend to publish London Plan:

- **Principle of development:** The proposed residential-led redevelopment of the locally designated Mixed-Use Opportunity site is supported in strategic terms, subject to satisfying the Council's recommendation for replacement employment floorspace and demonstrating compliance with the Mayor's intend to publish London Plan policy on agent of change principles.
- **Affordable housing:** The quantum (15%) and mono-tenure nature of the proposed affordable housing is wholly unacceptable. GLA officers will seek improvement to the quantum and affordability of the affordable housing and will robustly interrogate the financial viability assessment to ensure that the maximum amount of affordable housing, with an appropriate affordable tenure mix, is secured. The applicant must engage with a Registered Provider and consider grant funding as part of these discussions.
- **Heritage and urban design:** No harm would be caused to nearby Grade II listed Former Cauliflower Hotel. Further work relating to improving the scheme's residential quality is required.
- **Environment:** Further information on the proposed heat pumps and the potential to connect to district heating and future-proofing is required. The applicant should also submit the GLA spreadsheet; re-assess the Be Lean case; model the dynamic overheating to CIBSE TM59; and, provide PV as part of the strategy.
- **Transport:** Subject to the requested conditions, Healthy Streets (cycling) improvement and submission of an acceptably detailed cycle parking design plan, the proposals are acceptable in strategic terms.

For further information, contact the GLA Planning Team (Development Management):

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