Former Webbs Industrial Estate, Blackhorse Lane
in the London Borough of Waltham Forest

Strategic planning application stage 1 referral

The proposal
Demolition of existing buildings and structures, and comprehensive redevelopment to provide a series of buildings ranging in height from 1 to 15 storeys to provide 359 residential units, 2,569sqm of non-residential floor space, car parking, cycle parking, landscaping, highways and utilities works.

The applicant
The applicant is Swan Commercial Services (on behalf of Swan Housing Association & Catalyst Housing) and the architect is C F Møller.

Strategic issues summary

Principle of development: The mixed-use redevelopment of the vacant ex-industrial site to provide residential units as well as commercial and community floorspace, including affordable workspace, is strongly supported in principle. The applicant should, however, provide details of the rental discount for the affordable space as well as a management plan for the space.

Affordable housing: It is proposed to provide 100% of the residential units as affordable housing, all at intermediate tenure. Draft London Plan and the Affordable Housing & Viability SPG states that schemes which provide over 75% affordable housing can qualify for the Fast Track route, regardless of the tenure split, provided that the local Council supports the offer. It is understood that the Council have concerns regarding a single tenure affordable housing offer and, as such, the applicant has provided the Council with a Financial Viability Assessment to allow an assessment of whether the offer can be diversified. Notwithstanding the outcome of these discussions, the applicant should provide full details of the affordability of the shared ownership units.

Transport: TfL have concerns regarding the Blackhorse Road frontage, including the requirement for pedestrians to deviate from an existing desire line, narrowing of the footway and pedestrian / vehicular conflicts, and will engage with the applicant to address concerns. In addition, a financial contribution towards improving bus services should be secured within any s106.

Further details relating to urban design are also required.

Recommendation
That Waltham Forest Council be advised that the application does not comply with the London Plan and draft London Plan, for the reasons set out in paragraph 61. However, the resolution of those issues could lead to the application becoming compliant with the London Plan and draft London Plan.
Context

1 On 24 October 2018 the Mayor of London received documents from Waltham Forest 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 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:
   • Category 1A: Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats.
   • Category 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 Waltham Forest 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 1.67-hectare site is bound to the south by Blenheim Road, to the north-east by Sutherland Road, by Blackhorse Lane to the west and Highams Lodge business centre to the immediate north. The surrounding context is a varied: Sutherland Road features both warehouse and industrial buildings as well as post-2000 blocks of flats; Blenheim Road and the east side of Blackhorse Road are occupied by two-storey Victorian terraces; and the west of Blackhorse Road is designated as Strategic Industrial Land and is characterised by warehouse uses. There are no proximate heritage assets.

6 The site has been cleared, except for a substation. The site was last occupied by warehouse buildings that were used for storage, distribution and industrial activities. Access to the site is primarily from Sutherland Road, with secondary access for UKPN only from Blenheim Road to the substation. Historically, a stream laterally bisected the site; this was later culverted.

7 At a local level, the site is designated as lying within an archaeological priority area and a borough employment area. At a strategic level, the site lies within the Upper Lea Valley Opportunity Area and a Housing Zone. In addition, the site lies within the Council’s Blackhorse Lane Area Action Plan area, where it is allocated for mixed-use development, in line with the principles of a 2011 consent (LPA ref: 2011/0984/OUT and GLA ref: 2788) for the site for 235 residential units, 786 sq.m of employment floor space and 1,099 sq.m of retail; this consent has now expired and it is understood that it was never implemented.

8 The nearest section of the Transport for London Road Network (TLRN) is The Hale, located approximately 2 kilometres to the west of the site. The nearest section of the Strategic Road Network (SRN) is the Chingford Road (A112), located approximately 2.1 kilometres to the east of the site. The nearest London Underground Station is Blackhorse Road, which is located approximately 440 metres to the south of the site and is served by the Victoria Line and London Overground services between Barking and Gospel Oak. The nearest National Rail station is Tottenham Hale, which is located
approximately 2 kilometres to the west of the site and provides access to Greater Anglia services to London Liverpool Street. The nearest bus stops are the pair serving the 158, located north of the site on Blackhorse Lane, approximately 40 metres away (northbound) and 100 metres away (southbound) respectively. Based on these public transport connections, the site achieves a Public Transport Accessibility Level (PTAL) of 3, where 0 represents the lowest accessibility level and 6 the highest.

Details of the proposal

It is proposed to redevelop the site to provide 359 affordable homes, 2,565 sq.m of non-residential floorspace, including retail space, workspace, artists workshops and community floorspace, and landscaping. Table 1 details the proposed land uses.

Table 1 – Proposed land uses

<table>
<thead>
<tr>
<th>Land use</th>
<th>Proposed (GIA)</th>
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</thead>
<tbody>
<tr>
<td>Non-residential uses (Classes A1-A4, B1, D1 and D2)</td>
<td>2,565 sq.m</td>
</tr>
<tr>
<td>Residential</td>
<td>36,534 sq.m</td>
</tr>
<tr>
<td>Total</td>
<td>39,230 sq.m</td>
</tr>
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Case history

An initial pre-application meeting was held on 15 May 2018 with GLA officers. Following a presentation of the scheme from the applicant team, the discussion covered strategic issues with respect to the principle of development, commercial uses, housing, urban design, energy and transport. A formal advice note was issued on 31 July 2018, which concluded that the principle of the redevelopment was strongly supported in strategic planning terms; however, it also stated that the applicant should explore all opportunities to maximise employment uses on the site.

A follow-up meeting was then held on 10 July 2018, where the applicant presented updates to the scheme, followed by a discussion on design and energy. A note, circulated 23 August 2018, reiterated the view set out in the initial feedback note, on the principles of land use and noted that the design development was progressing well.

Strategic planning issues and relevant policies and guidance

The relevant issues and corresponding policies are as follows:

- Mix of uses  
  London Plan;
- Housing  
  London Plan; London Housing Strategy;
- 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;
- Sustainable development  
  London Plan; London Environment Strategy;
- Transport  
  London Plan; the Mayor’s Transport Strategy.
For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area comprises Waltham Forest Core Strategy (2012), Development Management Policies (2013), Blackhorse Lane Area Action Plan (2015) and the 2016 London Plan (Consolidated with Alterations since 2011).

The following are also material considerations:

- The National Planning Policy Framework (2018) and National Planning Practice Guidance;
- Draft London Plan (2017), which should be taken into account on the basis explained in the NPPF and Minor Suggested Changes, published in August 2018; and
- The decision in R(McCarthy & Stone) v. Mayor of London, which should be read alongside the Affordable Housing & Viability SPG.

Principle of development

Opportunity Area

London Plan Policy 2.13 and draft London Plan Policy SD1 states that development in Opportunity Areas is expected to optimise residential and non-residential outputs and contain a mix of uses in order to realise their growth and regeneration potential. London Plan paragraph 2.58 states that Opportunity Areas are the capital’s major reservoir of brownfield land with significant capacity to accommodate new housing and commercial and other development linked to existing or potential improvements to public transport accessibility, which is echoed in the supporting text to draft London Plan Policy SD1. Paragraph 2.61 of the London Plan confirms that Opportunity Areas are expected to make particularly significant contributions towards meeting London’s housing needs.

The Upper Lee Valley Opportunity Area was discussed within the London Plan as having capacity for approximately 15,000 jobs and 20,100 new homes. The Opportunity Area Planning Framework (OAPF) was published in 2013 and a primary objective of the OAPF is the growth and regeneration of a number of key locations, including Blackhorse Lane, where the site is included within the Sutherland Road cluster of sites where residential, employment and mixed-use development is sought. The opportunity for growth in the area is reinforced within the draft London Plan, which states, at paragraph 2.1.27, that the Lee Valley Opportunity Area is projected provide an approximate 21,000 homes and 13,000 jobs over the plan period.

The proposals would support the aims of London Plan Policy 2.13, draft London Plan Policy SD1 and the objectives of the Upper Lee Valley OAPF through providing homes and jobs on an underutilised site, as well as catalysing the regeneration of the site and its surrounding, through improving local connections and routes through the site, and contributing to the creative drawn

Local employment designation

London Plan Policy 2.7 seeks to address the constraints and opportunities in the economic growth of outer London so that it can rise above its long term economic trends and appeal to new sectors in order to achieve a step change in competitiveness and output. Policy 2.7 envisages that this will include provision for small and medium sized enterprises (SMEs), start-ups and businesses requiring more affordable workspace including flexible, hybrid office/industrial premises. Draft London Plan Policy E6 introduces greater protection of Locally Significant Industrial Sites and encourages a proactive approach to industrial intensification and co-location with residential – on the proviso that industrial capacity is maintained.

The site is designated as a local employment area in Waltham Forest’s Local Plan, where local policy DM19 seeks research and development, storage and distribution, general industry and office
uses, which are ancillary to the wider uses. It states that alternative uses, such as housing will only be acceptable within the borough’s key growth areas, “where they act as a facilitator to an improved and intensified employment offer on site, secure other regeneration benefits, and are considered acceptable in all other respects”. It is noted, at paragraph 20.8 of the Development Policies Document, that Blackhorse Lane is one key growth area.

20 The scheme will provide 2,565 sq.m of employment space on the present vacant, underutilised site. The applicant’s Economic Statement has estimated the previous industrial floorspace on the site as approximately 3,500 sq.m; as such, the proposed development re-provides 73% of the employment floorspace, but with significant residential development as well. In addition, the employment floorspace proposed must be considered in the context of the extant planning permission for the site, which proposed just 1,885 sq.m of employment floorspace, equivalent to just 53% of the total area. In addition, the proposals would significantly increase the density of employment uses on the site, through the provision of approximately 130 additional jobs over the existing land use.

21 The proposals will also considerably improve the quality of space on the site, enabling it to contribute to the borough’s recently designated Creative Enterprise Zone, and would also provide affordable workspace. In this regard, it is considered that the regenerative benefits of the proposals, both in terms of the employment and affordable housing offer (discussed in more detail below), as well as the urban realm improvements, represent a significant public benefit that outweighs the proposed net loss of industrial capacity in this instance.

**Housing**

22 London Plan Policy 3.3 and draft London Plan Policy H1 seek to increase the supply of housing in the capital. The proposed scheme would provide 359 homes, which equates to 20% of the annual monitoring target for Waltham Forest of 1,794 set out in the draft London Plan. The increase in the housing targets identified in the draft London Plan evidences the continued need for housing in the borough. The principle of the residential uses on the site is supported, subject to addressing the issues raised within this report with respect to maximising workspace, including and affordable workspace, and appropriately securing genuinely affordable housing. Housing and affordable housing is discussed in further detail in paragraphs 26-33.

**Non-residential floorspace**

**Policy context**

23 With regard to office policy, London Plan Policy 4.2 and draft London Plan Policy E1 support improvements to the competitiveness and quality of office floorspace, including improving floorspace for micro, small and medium-sized business. The draft London Plan also introduces distinct policies on low-cost business space, as set out in Policy E2, which is considered to be of a lower specification than prime office floorspace, and on affordable workspace, as set out in Policy E3, which is let at sub-market levels. As discussed in paragraphs 6.3.1 to 6.3.4 of the draft London Plan, the availability of low-cost business floorspace is currently limited, hence the additional importance of Policy E2 and Policy E3 in the draft London Plan.

24 The Mayor wishes to support sectors that have a cultural or social value, such as artists’ studios, and will encourage the delivery of new workspace for SMEs, the creative industries, artists and the fashion industry within new residential and mixed-use redevelopments. Further, draft London Plan Policy HC5 states that the Mayor will support London’s cultural and creative industries and has designated 10 ‘Creative Enterprise Zones’, where there are emerging or existing clusters of creative industries. Whilst the Council was unsuccessful in their bid to be a strategically designated CEZ, the Council has designated Creative Enterprise Zones locally, including Blackhorse Lane, where
aspirations include the creation of 2,500 homes and 1,000 homes as well as a microbrewery and a purpose-built music venue.

Assessment

25 Table 2 sets out the proposed commercial land uses and their location within the scheme. The applicant has set out their intention that the retail units will be occupied by independent traders and that the workspace will be offered to small-to-medium businesses and start-ups.

Table 2 – Location of non-residential uses

<table>
<thead>
<tr>
<th>Location</th>
<th>Use</th>
<th>Floorspace (GIA)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Block A, fronting Blackhorse Lane (ground &amp; first floors)</td>
<td>Flexible A1 / A2 / A3 / A4 / B1 / D1 / D2</td>
<td>460 sq.m</td>
</tr>
<tr>
<td>Block D, located adjacent to and fronting Sutherland Road</td>
<td>Flexible B1 / D1</td>
<td>316 sq.m</td>
</tr>
<tr>
<td>Block H, north east of site, adjacent to Sutherland Road</td>
<td>Flexible B1 / D1 at ground and B1 at upper floors</td>
<td>1,407 sq.m</td>
</tr>
<tr>
<td>Building K, south east of site (entire single storey building)</td>
<td>B1</td>
<td>122 sq.m</td>
</tr>
</tbody>
</table>

26 **Office / workspace:** The provision of office and workspace on the site is supported, in accordance with London Plan Policy 4.2 and draft London Plan Policy E1, which seek to enhance London’s office offer, including improving floorspace for micro, small and medium-sized businesses. It is also relevant to note that the Mayor has selected Waltham Forest as the 2019 London Borough of Culture, as part of his wider Culture Strategy, and the proposals would ensure that Waltham Forest has sufficient workspace for artists and others to work within the borough. The proposals also ensure that the site continues to provide employment generating land uses, in accordance with the local designation.

27 It is proposed that Block K will provide 122 sq.m of affordable studio floorspace (Class B1), which is equivalent to 5% of the total commercial offer. The applicant must provide details of the market rents for the site’s Class B1 floorspaces and the discount proposed to Block K. If the space is to be let to a workspace provider, the applicant should provide a management plan. Whilst the principle of affordable workspace is supported, Block K is physically isolated from the rest of the development and the applicant must confirm that the block benefits from the same specification as the comparable market commercial space and consider opportunities to integrate affordable workspace throughout the development.

28 **Retail:** The site is not within a town centre, where the London Plan and draft London Plan seek to concentrate new commercial development, but it does lie within an opportunity area and the proposed retail is to front Blackhorse Lane, which is a main route southward to the station.
balance, having regard to the scale of the proposed retail offer, GLA officers are satisfied that it would be complementary to the residential and employment floorspaces and, as such, does not raise any strategic concerns. Given the intentions for the retail units to be let to local businesses, the applicant should consider a clause within any s106 agreement, requiring preferential marketing to local businesses for a defined period, to best release the aims of a diverse, local commercial offer.

29 Community floorspace: The potential inclusion of community facilities or entertainment/leisure uses within the non-residential floorspace is supported, as they will complement, and provide services for, the residential units.

**Principle of development conclusion**

30 In this context, the net loss of industrial capacity is acceptable on balance and the principle of the residential-led redevelopment of the former industrial site, comprising 359 residential units, all of which are intermediate affordable housing, as well as 2,565 sq.m of workspace and retail floorspace within a locally designated employment area, is supported in strategic planning terms. The applicant must, however, have regard to the other points raised within this report.

**Housing**

Affordable housing

31 London Plan Policies 3.11 and 3.12 and draft London Plan Policy H5 and Policy H6 seek to maximise the delivery of affordable housing, setting a strategic target of 50% across London. The Mayor’s Affordable Housing and Viability Supplementary Planning Guidance seeks to increase the provision of affordable housing in London and embed affordable housing into land prices. The SPG introduced a threshold approach to viability, which is incorporated within draft London Plan Policy H6; schemes on industrial land or public land that provide 50% affordable housing on site, without public subsidy, and meet the specified tenure mix, as set out in draft London Plan Policy H7, are not required to submit viability information nor be subject to a late stage review.

32 The site is owned by the Mayor via Greater London Authority Properties (GLAP). GLAP invited bids from prospective developers in the summer of 2017. The provision of 100% affordable housing was part of the tender process, with bids welcome from developers proposing either 100% intermediate homes or 80% intermediate and 20% affordable rent. It is understood that all the bids that GLAP received were proposals for the 100% intermediate option. In line with this, the applicant is proposing 100% affordable housing, all of which will be intermediate (shared ownership). The units will be managed by Swan Housing and Catalyst as the Registered Providers bringing the scheme forward. It is understood that there is no grant funding going into the scheme.

33 The land is publicly owned and is currently in industrial land use; as such, the 50% threshold applies. Draft London Plan Policy H6 and the Mayor’s Affordable Housing and Viability SPG requires that, for schemes to be eligible for the Fast Track route, they must meet the following tenure mix: 30% affordable rented products; 30% intermediate products; and the final 40% to be agreed with the Council and GLA. Notwithstanding this, paragraph 4.7.13 of the draft London Plan and paragraph 2.42 of the Mayor’s Affordable Housing and Viability SPG state that schemes which provide over 75% can achieve the Fast Track route, whatever the tenure mix, provided it is agreed with the Council and Mayor.

34 Further to discussions at pre-application stage, it is understood that the Council had some outstanding concerns regarding the single tenure affordable housing offer. The applicant must reach agreement with the Council on the proposed tenures in order to confirm compliance with draft London Plan Policy H7 and the Mayor’s Affordable Housing and Viability SPG, and to ensure that the scheme may be considered under the Fast Track route.
35 Noting the Council’s concerns with the tenure mix at pre-application stage, the applicant has provided a Financial Viability Assessment to enable the Council to review the offer and ascertain whether the tenure mix could be diversified.

36 The applicant has not provided any details of the shared ownership units. As set out at pre-application stage, the applicant must provide full details of the affordability of the shared ownership units. For the avoidance of doubt, the units should be available to households on a range of incomes below the threshold, as set out in the draft London Plan. The applicant must also provide details of the management of the communal spaces as well as any service charges.

37 In accordance with the Mayor’s Affordable Housing & Viability SPG, any S106 agreement must include an early stage viability review mechanism to be triggered if an agreed level of progress on implementation has not been made within two years of any planning permission. If the proposals cannot be assessed under the Fast Track Route, a late stage review will also be required and secured within the S106. A draft of the S106 agreement must be agreed with GLA officers prior to any Stage II referral; example clauses are provided within the Affordable Housing & Viability SPG.

38 The Council must publish any financial viability assessment, submitted to support a planning application, in accordance with the Mayor’s Affordable Housing and Viability SPG. GLA officers will ensure that the assessment is made available, to ensure transparency of information.

**Urban design**

39 Good design is central to all objectives of the London Plan and draft London Plan. The applicant has engaged positively in the pre-application process, which is welcomed as it has enabled GLA officers to comment on the scheme early in its generation. It is considered that, on the whole, the scheme is of high architectural quality and is well-considered.

**Layout**

40 The proposals are comprised of 9 constituent blocks, rising from 1 storey to 15 storeys, orientated linearly along an east/west route through the site. The layout has been driven both by the desire to connect Sutherland Road to Blackhorse Lane and due to the location of a stream, presently culverted, running through the centre of the site. It is proposed that the central area, which has a higher risk of flooding, is used as public realm, with the partially deculverted stream as a central feature. The site is irregular in shape and to maximise usage of, and surveillance on, the tract of land that extends eastward, it is proposed to create single storey studio space (block K). The workspace blocks are located to the east of the site, with primary access from Sutherland Road. The residential units are accessed from the central public realm from Blackhorse Lane.

41 The central area of public realm also provides a link through the site, connecting Blackhorse Lane to Sutherland Road; this is route is a clear benefit of the proposed layout, as there is presently no connection between the two sides of the site. To provide a buffer between the two storey Victorian properties on Blenheim Road, it is proposed to set blocks A, B and C back behind an area of landscaping.
Figure 1: Proposed masterplan layout

Scale and massing

42 The tallest element of the scheme, blocks E and F, are internal to the site, located centrally on the northern portion of the site, which aids in limiting its impact when viewed from surrounding streets. The blocks fronting Blackhorse Lane rise to 7 and 9 storeys respectively, with the blocks on the southern boundary of the site rising to 6 or 7 storeys and set back behind a landscaped planted area.

43 The applicant’s Townscape and Visual Impact Report (TVIA) presents CGIs of the scheme in context. Whilst the proposals, as illustrated, appear to be a significant change to the existing situation, when viewed from Blackhorse Lane. However, it is important to acknowledge that the site is presently vacant, with the exception of a substation. Local views from Blackhorse Lane, Sutherland Road and the west of Blenheim Road suggest that the scheme is visible but well integrated into the surrounding built environment; however, the applicant should provide a view of the scheme from Blenheim Road, just to the west of Pembar Avenue, to verify the proposed impact on the character of that street.

44 The applicant has also presented longer range views, as discussed at pre-application stage, which indicates that the scheme would be visible on the horizon, when looking eastward across Walthamstow Wetlands, but would be subservient to other consented developments, which is much closer to the reservoir and is presently under construction.

Architecture

45 The proposed development is of high architectural quality, with the site’s various land uses within buildings with different architecture. The 4-storey workspace building, block H, is proposed to be clad in pink pigmented reconstituted stone, with semi-circular floor to ceiling windows. The building is significantly different in colour and design to the other buildings on the site, providing visual interest within the site as well as on the Sutherland Road corner of the site.
46 Block D, on the eastern boundary of the site, references the sawtooth roof line of the adjacent industrial building on Sutherland Road. Whereas buildings A and G, which front Blackhorse Lane are proposed to be brick clad at the lower levels, with dark aluminium cladding to the north. Furthermore, the single storey studio building is shaped like a terrace of houses and is made of oxidised copper. To ensure the scheme’s high architectural quality is retained, the applicant should provide examples of where each type of metal cladding has been used before to enable officers to understand how it weathers.

47 The scheme has good residential quality, with all units meeting or exceeding minimum space standards and 69% of dwellings benefitting from dual or triple aspect, with no north facing units.

Inclusive access

48 The applicant has confirmed that all of the extra care units comply with Part M4(3) of the building regulations on wheelchair users’ dwellings, which is supported. The applicant has confirmed that 10% of dwellings will be wheelchair accessible.

49 In terms of access throughout the public realm, the applicant has stated that the development will create an accessible development, with homes accessed directly from the main circulation area; however, further details should be specifically provided with regard to the public realm, including where the stream will be crossed, routes and gradients. Furthermore, the applicant should confirm whether the workspaces will be accessible.

Energy

50 It is understood that the applicant, through pre-application discussions with the Council has agreed to submit two energy strategies to afford the time to conclude their feasibility studies on the solution to be taken forward. The two energy strategies consider a Combined Heat and Power led solution and a Ground Source Heat Pump led solution. The applicant’s aspiration is to take the GSHP solution forward, but technical and financial studies are ongoing to demonstrate this technology’s appropriateness for the site and scheme. Further information is set out in the detailed comments, however, for the purposes of this assessment of assessing this energy statement and agreeing on a CO2 emissions reduction and carbon offset arrangement, the GLA has assumed that the GSHP solution will be put forward and the below reflect this. Confirmation from the applicant is required on this approach and should the approach differ, a revised thorough assessment will be required.

51 With regard to the ‘be lean’ part of the hierarchy, the following are required: the DER and TER output sheets; BRUKL sheets; energy demand should be reported following energy efficiency measures; and provide overall Fabric Energy Efficiency performance. In terms of ‘be clean’, the applicant should provide a commitment to ensure that the development is designed to allow a future connection to a district heating network and a drawing showing the route of the heat network should be provided. To comply with the ‘be green’ part of the hierarchy, the applicant is proposing a range of renewable energy technologies, including PV panels, Air Source Heat Pumps for the commercial area and a Ground Source Heat Pump; further information on these must be provided.

52 The proposals would reduce domestic carbon emissions by 36%, which exceeds the target set out in London Plan Policy 5.2. It should also be noted that draft London Plan Policy SI2 will require non-domestic buildings to be zero carbon by 2019 or provide an offset payment. In terms of non-domestic carbon emissions, the proposals reduce emissions by 38%, which exceeds London Plan Policy 5.2. The applicant has confirmed that they will make a payment to the borough’s offset fund.
Transport

53 A financial contribution towards enhancing bus services along Blackhorse Lane will be required to mitigate the impact of the proposal. This sum would be used to both improve capacity and to improve links with Walthamstow town centre and other facilities that are not within walking distance; this should be secured within any s106.

54 The proposed development would be car-free (with the exception of Blue Badge parking) and, therefore, complies with draft London Plan Policy T6. The total disabled car parking provision is equivalent to 8% of dwellings, which is slightly below the draft London Plan requirements; however, on balance, subject to addressing concerns about enhancing bus connections, it is acceptable. The Blue Badge car parking, electric vehicle charging points and a car park management plan should be appropriately secured.

55 Both long-stay and short-stay cycle parking meets draft London Plan standards; however, in order to comply with London Plan Policy T2 regarding Healthy Streets, further information and amendments are required on the cycle routes to resolve potential pedestrian and cyclist conflict. The Council, as the local highway authority, should confirm that the proposed improvements to pedestrian links are sufficient to ensure full permeability through the development. In addition, there is presently a conflict between the planned zebra crossing and an existing tree.

56 Further discussion is also required regarding the siting and the design of the proposed Blackhorse Road frontage as the colonnade would result in pedestrians having to detour from an established desire line and 24-hour access to be secured. In other locations, TfL have concerns that the footway would be too constrained by the building and a planned cycle route, resulting in the privacy of residents at the ground floor potentially being compromised. These issues should be resolved to better deliver an inclusive environment and promote active travel; TfL will engage with the applicant as a matter of priority.

57 The applicant has provided an outline Construction Logistics Plan and a draft Delivery and Servicing Plan. The commitments in these documents should be detailed in full Plans which should be secured by condition. Revisions are, however, required to add further detail to the details of servicing to better accommodate the expected high demand for home deliveries and to limit adverse safety and comfort impacts of operations especially on vulnerable pedestrians and cyclists.

58 The Council should secure, enforce, monitor, review and ensure the funding of the Travel Plan through any s106 agreement to ensure conformity with draft London Plan Policy T4. It should also follow the principles set out in the submitted framework Travel Plan.

Local planning authority’s position

59 Waltham Forest Council Planning Officers are assessing the applicant and a committee date has not yet been established.
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, 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.

Conclusion

London Plan and draft London Plan policies on principle of development, housing, urban design, energy and transport are relevant to this application. The application does not currently comply with the London Plan and draft London Plan, however, the following changes might lead to the application becoming compliant:

- **Principle of development**: The mixed-use redevelopment of the vacant ex-industrial site to provide 359 affordable residential units as well as commercial and community floorspace, including affordable workspace, is supported in principle. The applicant should, however, provide details of the affordable workspace offer.

- **Affordable housing**: It is proposed to provide 100% of the residential units as affordable housing, all at intermediate tenure. Draft London Plan and the Affordable Housing & Viability SPG states that schemes which provide over 75% affordable housing can qualify for the Fast Track route, regardless of the tenure split, provided that the local Council supports the offer. It is understood that the Council has concerns regarding a single tenure affordable housing offer and, as such, the applicant has provided the Council with a Financial Viability Assessment to allow an assessment of whether the offer can be diversified. Notwithstanding the outcome of these discussions, the applicant should provide full details of the affordability of the shared ownership units.

- **Urban design**: The buildings are of a high architectural quality and the applicant has engaged positively throughout the pre-application process. The applicant should, however, provide additional views of the scheme from Blenheim Road.

- **Energy**: The applicant has proposed two alternate energy strategies, a Combined Heat and Power solution and a Ground Source Heat Pump led solution. Given it is the preferred approach, GLA officers have assessed the GSHP strategy; however, should an alternate strategy be developed, a revised assessment will be required. For the GSHP strategy, further information is required on all parts of the energy hierarchy, as set out in London Plan Policy 5.2 and draft London Plan Policy S12.
• **Transport:** Further discussion is required regarding the Blackhorse Road frontage, including the requirement for pedestrians to deviate from an existing desire line, narrowing of the footway and pedestrian / vehicular conflicts. In addition, a financial contribution towards improving bus services should be secured within any s106.

for further information, contact GLA Planning Unit:

**Juliemma McLoughlin, Chief Planner**
020 7983 4271  email juliemma.mcloughlin@london.gov.uk

**John Finlayson, Head of Development Management**
020 7084 2632  email john.finlayson@london.gov.uk

**Graham Clements, Team Leader**
020 7983 4265  email graham.clements@london.gov.uk

**Vanessa Harrison, Principal Strategic Planner (Case Officer)**
020 7983 4467  email vanessa.harrison@london.gov.uk