

LONDON BOROUGH OF WALTHAM FOREST

Committee / Date:	Planning – 7 th September 2021
Application Reference:	210776
Applicant:	Countryside Properties
Location:	The Magistrates, 1 Farnan Avenue, Walthamstow, London, E17 4NX
Proposed Development:	Demolition of the former Magistrates Court Building and other associated structures and buildings and redevelopment of the land within the setting of (but excluding) the Grade II Listed Town Hall and Assembly Hall to provide five new residential blocks ranging from 5- 9 storeys comprising new residential units (Use Class C3); new civic building to provide civic functions and flexible commercial or community space (Use Classes E or F); creation of new civic spaces and public realm works; play space; landscaping; and associated residential (disabled only) and non-residential parking (including disabled); cycle parking; access and servicing. Amended description - Further information/amended Environmental Impact Assessment (EIA) as per Regulation 25 of the EIA Regulations).
Wards Affected:	Chapel End and Hoe Street

1. RECOMMENDATION

- 1.1. That Planning Permission be **GRANTED** subject to conditions and informatives, Stage 2 Referral to the Greater London Authority (GLA) and completion of a Section 106 Legal Agreement (S106) with the following Heads of Terms:

Affordable Housing

- 87 (47%) - London Affordable Rent homes
- 118 (53%) Shared Ownership homes
- Early Review Mechanism – GLA Formula 1a and 2 – trigger is substantial implementation.

Education

- A S106 contribution of £176,607 is made towards providing additional places.

Nursery

- Countryside to use reasonable endeavours to work with LBWF Early Years to secure a suitable operator, with LBWF confirmation that an operator is suitable not to be unreasonably withheld or delayed.
- Countryside only to enter into agreement with an Ofsted registered operator.

Employment and Training Strategy

- Construction Jobs - Procure that 30% of all jobs available for the construction or fit-out of the Development during the Construction Phase are fulfilled by Local Residents. Local Residents defined as residents of residents of Waltham Forest.
- Local Labour – Apprenticeships - Provide a minimum of 35 Apprentice Posts in the construction trade during the Construction Phase of the Development with such posts being first offered to Local Residents through the Council's Employment, Business and Skills Service. Default Payments if 30% of local labour is not met.
- Work Placements - To provide a minimum of 22 Work Placements, paid at London Living Wage (LLW) in the construction trade during the Construction Phase of the Development with such posts being first offered to Local Residents through the Council's Employment, Business and Skills Service.
- Employment and Skills Plan - To be negotiated and prepared at least 6 weeks prior to implementation. Provide details of all new jobs created in the development to the Council in reasonable time.
- End Use - To procure that the end user is to liaise with the with the Employment, Business and Skills Service's lead contact to ensure efficient management and supply of local Council residents for employment and training opportunities post Implementation of the Development.
- To ensure that all of the jobs that are generated by the operator to go through the Council's Job brokerage service, Steps Into Work (SiW), in the End User Phase as local labour opportunities for Local Residents
- To use reasonable endeavours to ensure that 30% (thirty percent) of nontechnical jobs are taken up by Local People in the End-User Phase of the Development. If 30% is not achieved, then the Developer shall demonstrate such reasonable endeavours to the Council's satisfaction and agreed in writing by the Council. End Use employment anticipated to be limited - estate management and nursery staff
- Default Payments – as set out in LBWF's adopted Planning Obligations SPD if obligations above are not met.

Highways and Transportation:

- A S106 contribution of £7,500 for CLP monitoring;
- A S106 contribution of £50,000 to review, consult and possibly implement modifications to the four surrounding CPZ's to suitably mitigate any adverse parking impact generated by the development;
- A S106 contribution of £400,000 is requested to implement the Forest Road design with segregated cycle track and pedestrian improvements on the south side of Forest Road opposite the site to improve safety for the increased number of walking and cycling trips on the Forest Road frontage.
- A S106 contribution of £300,000 is required towards TfL Public Transport Station upgrade and Active Travel Behaviour Change Initiatives for the new residents, employees, visitors, and families visiting and utilising the new development. To ensure a legacy of significant legacy of behaviour change is implemented and sustained bespoke training for families and staff should be offered due to the car free nature of residential development and aspirations for commercial element.
- A S106 contribution of £20,000 is required towards parking enforcement to assess and review the essential user exclusion zone.

- A S106 contribution of £20,000 is required towards parking enforcement for increased resources to facilitate enforcement presence in the surrounding roads due to the impact from the new development
- A S106 contribution of £20,000 towards wayfinding in the surrounding area.
- The site shall be car free; residents shall not be entitled to parking permits for any surrounding CPZ.
- The S278 Agreement would include (but not be limited to) the following works:
 - A review of expected pedestrian movements, and accommodation for these in a new highway layout
 - A review of expected cycle movements accessing the site, taking into account the new cycle entrances and a redesign to ensure opportunities for conflict are mitigated by design.
 - Renewal of the footway on the frontage of the site
 - Blended crossing at the vehicle entrance along Farnan Ave. Suitable provisions should be made for pedestrians and cyclists accessing the site from the North.
 - Suitably raised entrance at the vehicle entrance along Forest Road.
 - Upgrades to public lighting, taking into consideration the increased pedestrian and cycle movements. Realignment may be required due to the resultant road space redistribution.

Air Quality:

- A financial contribution of £87,680 towards implementation of the Air Quality Action Plan.

Carbon Offset Fund:

- A minimum financial contribution of up to £543,507 towards the Carbon Offset Fund in each of the phases hereby permitted to be agreed in writing where payment is required to address the shortfall in carbon emission reductions

Energy and Sustainability:

- To design and construct the whole development so that it is capable of connecting to a decentralised energy network, including associated reserved areas in the plant room and protected pipework routes within and adjacent to the development.
- Full s106 requirements for an Updated Energy Statement, including compliance with CIBSE Code of Practice and Heat Trust Standards.

Epping Forest Special Area of Conservation (SAC):

- A financial contribution of £43,300 towards the Epping Forest Strategic Access Management and Monitoring Strategy (SAMMS).
- A financial contribution of £227,325 towards improvements to mitigate recreational impacts on Epping Forest SAC (SANGS).

Car Free Housing

- No residential unit eligible for parking space unless disabled/blue badge holder
- Each new Residential Occupier of the development must be informed prior to occupying any residential unit that they shall not be entitled to a residents parking permit unless blue badge holder.
- Car club membership for one year with an accredited car club operator. This means 1 transferable membership per household, with a maximum of 3 years per dwelling in total, regardless of any changes in ownership or occupation of a dwelling during this period
- Evidence of car club contract to be submitted prior to occupation.

Wheelchair Housing

- Wheelchair housing to be exclusively marketed to those who require wheelchair accessible housing in accordance with a Wheelchair Accessible Dwelling Marketing Strategy that sets out how the wheelchair units would be promoted and advertised during the exclusivity period to be agreed prior to commencement of development of the relevant part of the development.
- LBWF to support the developer in the development and execution of the Wheelchair Accessible Dwelling Marketing Strategy.

Travel Plans:

- Travel Plan to identify opportunities for the effective promotion and delivery of sustainable transport initiatives.
- Monitoring contribution of £4,000 – one off payment

Flood Mitigation

- A S106 contribution of £150,000 is required towards the delivery of the Flood Mitigation Scheme proposed within Chestnuts Field and towards further mitigation initiatives.

Public Realm

- A S106 contribution for a drinking water fountain should be secured including management and maintenance.

Retention of Architect

- The Parties confirm and agree for the proper delivery of the Development the original design vision for the Development will be delivered through to the construction of the Development and therefore the Owner covenants with the Council to ensure it will take all reasonable steps to deliver the nature and design of the Development as envisaged by the Application
- The owner therefore covenants with the Council not to implement the Planning Permission: until they have submitted a statement to the Council setting details of the design team, which will include the Architect, retained in connection with the construction of the Development provided a written undertaking that such design team an Architect will be retained by the Owner until Practical Completion of the Development

Monitoring and Implementation:

- 5% of the total amount of contribution, or as otherwise agreed with the Council, towards monitoring, implementation and compliance of the Section 106 legal agreement.

Legal Fees:

- Payment of the Council's legal fees for the preparation and completion of the Legal Agreement.

Minor Amendments

That authority to be given to the Assistant Director of Development Management and Building Control in consultation with the Council's Legal Services for the sealing of the Legal Agreement and to agree any minor amendments to the conditions or the Legal Agreement on the terms set out above.

In the event that the Section 106 legal agreement is not completed within a reasonable timeframe following the date of Planning Committee, the Assistant Director of Development Management and Building Control is hereby authorised to refuse the application in consultation with the Chair. In the absence of this Legal Agreement, the proposed development would not be able to deliver the mixed-use development on the site. The implication of this happening is that the opportunity for securing the provision of affordable housing would be lost. Additionally, financial, and non-financial contributions would be lost towards the following: Employment and Training Strategies; Highways; Sustainability; and Epping Forest SAC, which must be secured by the legal agreement. In the absence of the legal agreement the Council would not be able to ensure that:

- The aims of policies seeking the creation of employment opportunities and jobs growth are met;
- Potential air quality impacts of the development are mitigated;
- Measures are in place to improve the public realm and promote sustainable travel options and reduce car use; and
- Design quality is maintained.

2. REASONS REFERRED TO COMMITTEE

- The application is classed as a largescale major application with a quantum of 433 residential units which is strategic in planning terms and referable to the Mayor of London.
- Major matters of planning policy are involved.
- Significant public interest.

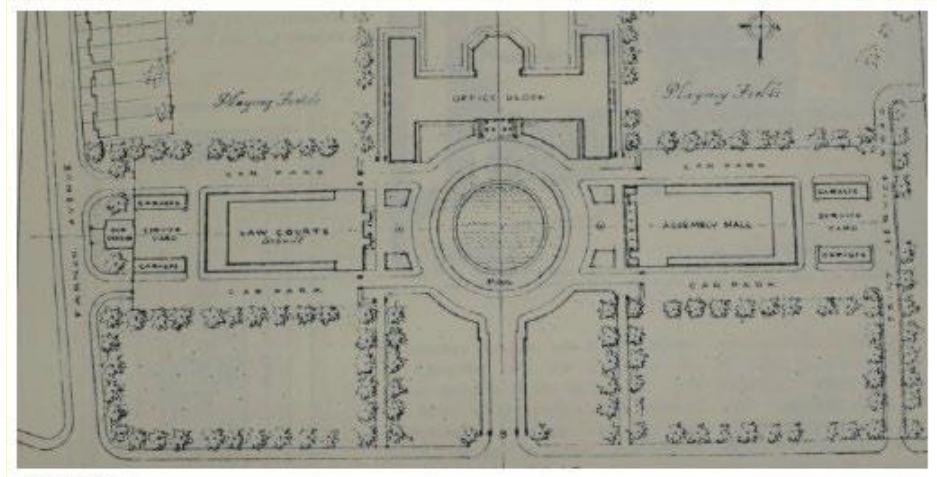
3. SITE AND ITS SURROUNDINGS

The site

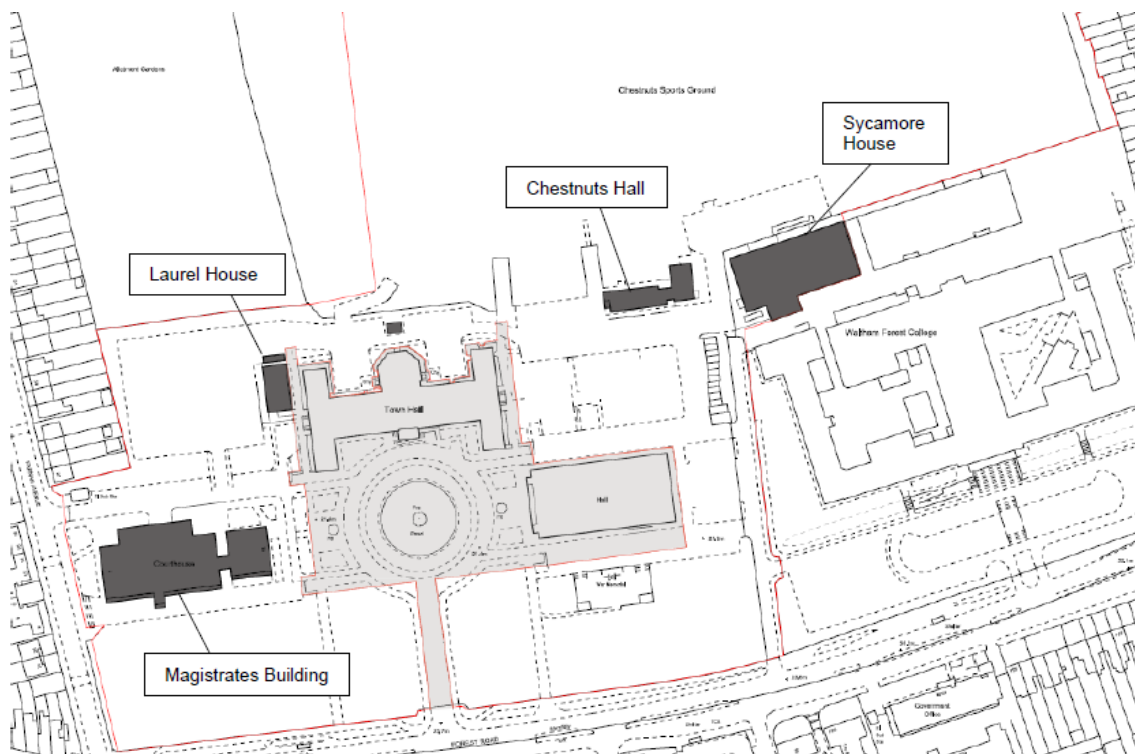
- 3.1. The application site measures approximately 7.16 hectares in area and is situated to the immediate north of Forest Road in Walthamstow. It is bounded to the west by two-storey terraced dwellings along Farnan Avenue, to the east by Waltham Forest College and Spruce Hills Road, and to the north by allotments, and the Waltham Forest Feel Good Centre and athletics track. The site comprises civic office space, a café at ground floor level of the Magistrates Building for Council staff and visitors, and recreational open space at Chestnuts Sports Ground and the front lawns. This now includes Fellowship Square, delivered as part of the phase one works, and includes new fountains and public realm. There are surface level car parking spaces for staff and visitors on the site located mainly to the rear of the Magistrates Building and the Town Hall. The site which forms part of the Waltham Forest Town Hall campus has been used for civic purposes since the construction of the Town Hall in the 1940s. The former Magistrates Court Building which provided probation services was decommissioned and is in a meanwhile use as civic offices.

- 3.2. Now known as the Fellowship Square, the application site currently consists of the Town Hall (occupied by Waltham Forest Council), an Assembly Hall, a former Magistrates Court building, an office building, significant areas of parking and areas of open park space. Alongside the main Town Hall, the site hosts a number of Grade II listed buildings and monuments and comprises the following:
 - Walthamstow Town Hall;
 - Assembly Hall to South East of Town Hall;
 - Walthamstow Civic Centre Pair of Flagpoles in Forecourt to South of Centre;
 - Walthamstow Civic Centre Eight Pairs of Gate piers in Forecourt to South of Centre;
 - Gates, Gate piers and Railings at Walthamstow Civic Centre; and
 - War Memorial, Waltham Forest Town Hall

- 3.3. Both the Town Hall and the Assembly Hall were designed and completed between 1937 – 1942. At the time, Walthamstow District Council required a new Town Hall and associated buildings – a civic campus that would serve the growing population of the area. A competition was set up in 1929 to find a design. The winning scheme was revealed in 1932 to be that of Phillip Hepworth, with a scheme typical of the early 20th century which combined classical proportions with detail. It was influenced by Scandinavian design and sometimes referred to as 'Nordic classicism'. The winning proposal comprised the Town Hall placed with an Assembly Hall to the east and a Magistrates Court to the west around a central square and set forward of the Town Hall see the image of the original Hepworth Masterplan below:



- 3.4. The original concept of a defined symmetry was not fully realised due to the revision, which excluded the Magistrates Courts. Thus, only the Town Hall and Assembly Hall were constructed as part of the original Hepworth vision for the site.
- 3.5. The three storey Magistrates Building that is currently present on the site was added in the early 1970s, but not entirely symmetrically in relation to the Town Hall and Assembly Hall and in a completely different building style, showcasing a Brutalist form of architecture. Alongside the Magistrates building, there are a host of modern additions that have been added to the site to serve its civic purpose. This includes the four storey Sycamore House building in the north-eastern corner of the site and a number of single storey ancillary/outbuildings scattered throughout including Chestnut Hall and Laurel House. The Town Hall, Magistrates Building and Sycamore House are all utilised as civic office space. The Assembly Hall is used primarily for social and civic events including weddings and concerts. The plan below illustrates this:



- 3.6. The site is neither located within a town centre nor a designated local centre, but Wood Street District Town Centre is approximately 0.5km east of the site, and Walthamstow Major Centre, is nearly 1km SW of the site. However, the site is located in a prominent position within close proximity to a number of local amenities and is well connected in terms of pedestrian and cycling facilities. The 'Mini Holland' cycling scheme located close by allows further utilisation of the school, shops and outdoor green space and sporting facilities that are readily available. Access to Walthamstow Town Centre can be gained via Hoe Street, which has 2.5m wide pedestrian footways on both sides of the carriageway. Local amenities including retail, restaurants, public houses and public transport stops and stations are all found on or close to Walthamstow High Street.
- 3.7. Chestnuts Field exists directly north of the Town Hall. The field itself can be accessed via Forest Road and crossing through the Town Hall campus, as well as via an entry gate off Spruce Hills Road to the east. Chestnuts Field is a recognised planning field by Sports England. There is a pathway from Chestnuts Field that provides pedestrian access to the Feelgood Centre and Athletics Track neighbouring to the north. Directly east of Chestnuts Field is an allotment site. These allotments can also be directly accessed from Chestnuts Field of the Town Hall site.
- 3.8. The primary vehicular access point to the site is via the Forest Road frontage, whilst a secondary access point exists to the west from Farnan Avenue, and further, a shared easement exists on the eastern boundary with the adjoining Waltham Forest College. Whilst the frontage of the site presents green lawns to the Forest Road streetscene, the remainder of the site is covered in hardstanding and parking, accommodating 387 vehicular spaces for staff and visitors.
- 3.9. There are four designated pedestrian entry points exist along the Forest Road frontage, including to the main entry gate, and one further entrance is located along Farnan Avenue.
- 3.10. The site has a PTAL of 2-3 (poor to moderate) with 6b being best and 0 being the worst) and is serviced by a number of bus stops along Forest Road. Further afield, Walthamstow Central Station is circa 18 mins walk, whilst Wood Street Station is circa 15mins walk.
- 3.11. The site does not fall within a Conservation Area although the boundary of the Lloyd Park Conservation Area is some 250m to the west of the site. There are six listed buildings or structures either within or in the vicinity of the site with Grade II listing. The adjoining Waltham Forest College is a locally listed building.
- 3.12. The site falls within the identified Epping Forest Special Area of Conservation (EFSAC), under the EU Habitats Directive (92/43/EEC). Biodiversity features within, or associated with, a SAC enjoy a high level of protection under UK and EU Law.
- 3.13. The site is located within the emerging Forest Road Corridor, which is of strategic importance which is a growth corridor.
- 3.14. The site falls within the Borough-wide Air Quality Management Area (AQMA) and Flood Zone 1 (1 in 1000) which is considered low risk according to Environment Agency records, however there are localised pockets of low to medium surface water flood risk across the site from a critical drainage area.
- 3.15. The does not fall within an Archaeological Priority Zone.

The Surroundings

- 3.16. The site is bound by Forest Road to the south, Spruce Hills Road to the east, and Farnan Ave to the west. The Feelgood Leisure Centre and associated athletics track bounds the site to the north, adjoining Chestnuts Field and the neighbouring allotments.
- 3.17. The surrounding area is varied in terms of built form. North of the site are a collection of community uses including the three storey Feelgood Centre, Sir George Monoux College and a number of associated green spaces. Directly east of the site is the Waltham Forest College, four storeys in height and made up of a mixture of established buildings (1938) and modern additions. Beyond the college are rows of residential terraced housing.
- 3.18. West of the site along Farnan Ave and nearby surrounding streets are rows of two to three storey traditional terraced and infill residential dwellings. Beyond this exists the three storey William Morris Gallery and surrounding open space area of Lloyd Park.
- 3.19. To the south along Forest Road, a key arterial route and connection through the Borough, exists a collection of commercial buildings including a YMCA directly opposite at circa nine storeys in height and the Danson House building at four storeys in height. These are interspersed with two to three storey terraced homes and infill apartment buildings. Further to the east along Forest Road is a twelve storey residential tower, the former Wood Street Library and former Homebase Site, for which recent planning permission for wholesale redevelopment was granted (ref: 202512). This strip to the east forms the Wood Street localised centre area, with terraces characterised by ground floor shops and commercial units with residential dwellings above.
- 3.20. The site is located in the major district of Walthamstow, in the London Borough of Waltham Forest. Located approx. 7.5 miles from Charing Cross, the site is part of the wider suburban neighbourhoods of North London with a wide variety of housing stock, of which the majority was built in the 20th century during the suburban growth of London.
- 3.21. The wider area of Walthamstow is found in between two major geographic exceptions to the urban conurbations of North London: The Lee River Valley to the west specifically the Lee Valley Reservoir Chain, which separates the borough to Haringey and Enfield - and the southern tip of Epping Forest to the east - acting as a boundary between Waltham Forest and Redbridge.

4. APPLICATION PROPOSAL

- 4.1. The application seeks planning permission as part of the Phase 2 regeneration works for the demolition of the former Magistrates Court Building and other associated structures and buildings and redevelopment of the land within the setting of (but excluding) the Grade II Listed Town Hall and Assembly Hall to provide five new residential blocks ranging from 5- 9 storeys comprising new residential units (Use Class C3); new civic building to provide civic functions and flexible commercial or community space (Use Classes E or F); creation of new civic spaces and public realm works; play space; landscaping; and associated residential (disabled only) and non-residential parking (including disabled); cycle parking; access and servicing.
- 4.2. This is a Council led scheme with a Development Partner (Countryside Properties Plc) that seeks to comprehensively transform the Town Hall Campus known more

commonly as Fellowship Square with associated car parking, a new civic building, and 5 residential-led blocks delivering a total of 433 units with a mix comprising:

- 30 studios (7%)
- 134 one-bedroom units (31%)
- 198 two-bedroom units (45%)
- 69 three-bedroom units (16%)
- 2 four- bedroom units (1%)

4.3. This represents the following percentage:

	1b	2b	3b	4b+
Market	37%	51%	12%	0%
Intermediate	47%	39%	14%	0%
Affordable	28%	41%	29%	2%

4.4. The blocks plus the Civic building range in height from 3 to 9 storeys as expressed in the table and illustration below:

Block	No. Storeys
Civic Building	3
B	5, 6
C	7, 9
D	5
H	5,6
J	5



- 4.5. The residential component seeks to deliver 50% affordable housing by habitable room with a tenure split of 47% affordable rent as genuinely affordable London Affordable Rent (LAR) and 53% intermediate as shared ownership housing.

Development Summary:

Civic Building:

- 577sqm of shared working and café space at ground floor (use Class E and F);
- Council reception area and secure meeting rooms at ground also;
- 2503sqm of Council offices on two floors above;
- 3 storeys in height to match Town Hall and 'complete' Hepworth Masterplan; and

Block B:

- 5 storey courtyard block (matching Town Hall height), with a 6th floor 'pop-up' level on the eastern side;
- 133 residential units, with a mixture of 1, 2 and 3 bed homes across all tenures;
- 88 car parking spaces at lower ground level (80 for Council use, 4 resi disabled spaces and 4 car club spaces); and
- 227 cycle parking spaces

Block H:

- 5 storey courtyard block (matching Town Hall height), with a 6th floor 'pop-up' level on the western side;
- 108 residential units arranged across all levels, with a mixture of 1, 2 and 3 bed homes across all tenures,
- 196 cycle parking spaces

Block C:

- A stepped 'L' shaped building facing Chestnuts Field, lower-ground floor car parking and a podium garden above.
- Generally, 7 storeys in height, with a 'pop-up' 9 storey element in the north-eastern corner away from the Town Hall
- 140 residential units with a mixture of 1, 2, and 4 bed homes across all tenures.
- 29 car parking spaces at lower ground level (29 for Council use, 5 resi disabled spaces); and
- 176 cycle parking spaces

Block J

- 5 storey rectangular 'bookend' block to the west of the proposed Civic Building.
- 28 no. 1 and 2 bedroom homes across all floor levels, for Private Sale.
- Ground floor commercial space (Class E and F) including proposed housing office.
- 47 cycle parking spaces

Block D

- 5 storey rectangular 'bookend' block to the east of the Assembly Hall building.
- Commercial space at ground floor (Class E and F).

- 24 no. 1 and 2 bedroom homes across the upper floors for Private Sale and Shared Ownership sale.
- 52 cycle parking spaces Site Wide:

Site Wide:

- New landscaping and enhanced public realm across the site including meadow gardens to the rear of the Town Hall and enhanced War Memorial
- New pathways for improved wayfinding, connectivity and enrichment of the public offering and the setting of Listed Buildings. 94 Sheffield-style visitor cycle spaces incorporated into landscaping
- New tree planting across the site (circa 230 new trees).
- Upgraded landscaping and layout of Chestnuts Field including new perimeter pathway, informal gym/exercise pockets, children's play space, a wetland area to the north-western corner, and maintenance/enhancement of the existing woodland area along the northern boundary of the field.

- 4.6. Plot ratio of the site area would be very low. The remaining area would provide public realm, open space, play areas and landscaping - placemaking. There would be identified areas of soft landscaping and connectivity forming an integral part of the design and layout of the scheme and these are named and described as follows:

	Provision (sqm)
Private External Amenity Space (balconies, private terraces & gardens)	2,923
Private Internalised Amenity Space (additional living space)	938
<i>Subtotal (all private amenity space)</i>	<i>3,861</i>
Communal Private Amenity (Courtyards and shared gardens)	2,853
<i>Sub-total (all private & communal amenity space)</i>	<i>6,714</i>
Civic Communal Space (public realm, gardens, Chestnuts Fields)	53,146
TOTAL	59,860

- 4.7. 4,429sqm of children's play space is provided throughout the scheme for the different age groups between 0-12+ years as described in the table below:

	Benchmark Value (GLA 10 sq.m. per child)	Scheme Provision sq.m.
Doorstep Play (0-5 years)	930	2414m2 area of formal and informal play within courtyards and residential garden.
Local Play (5-11 years)	662	861m2 dedicated play area to south of Chestnuts Field (within 400m of residential entrances).
Youth Play (12+ years)	356	Extensive play opportunities across the site. In particular southern edge of Chestnuts Field 1154m2.
TOTAL	1,948	4,429

- 4.8. Residential parking provision would be limited as the scheme is to be 'car free' with the exception of 14 blue badge bays spaces giving a total of 143 car parking spaces provided outside Block H and in the under-croft car parks in Blocks B and C broken down as follows:
- 117 spaces for employees of the Civic building (including 8 disabled spaces).
 - 2 car club and 4 pool car spaces.
 - 6 service / drop-off bays.
 - 14 disabled spaces for the residential units.
- 4.9. A total of 20% of these spaces would have electric vehicle charging points.
- 4.10. Civic parking would be provided primarily within the Blocks B and C parking areas, with disabled parking spaces provided at grade outside of Blocks B and H and in proximity to the access cores. In terms of car club, one space would be located at grade outside Block B and another outside Block H. The 4 pool spaces would be located in the under-croft car park in Block B.
- 4.11. Access to Block B and C parking via eastern access point from Forest Road, between the Fellowship Square and neighbouring Waltham Forest College. This access point would form the main access point to the site.
- 4.12. 788 residential cycle parking spaces are proposed (770 long-stay and 18 short-stay), whereby residential provision is via a mixture of two-tier racks and Sheffield stands within each residential block, whilst visitor spaces are Sheffield stands at grade around the site.

Block	Minimum number of Cycle Parking Spaces
Block B	240
Block C	257
Block D	44
Block H	183
Block J	46
TOTAL	770

- 4.13. 134 cycle spaces to service the civic and commercial functions of the site, incorporating 58 long-stay and 76 short-stay spaces. Long-stay cycle parking would be provided in the basement of the established Town Hall, where there is space to extend the existing facilities for Council staff. This provision would be provided as a combination of Sheffield stands and two-tier racks. Short-stay cycle parking will be provided as Sheffield stands and will be incorporated into landscaping of the site.
- 4.14. During the application process, the following revisions were made:

Block H:

- Omitted the energy centre and the lightwell;
- Revised the planters around the ground floor façade;
- Showed a small projecting retaining wall on the level change; and

- Added a garden gate and fence to the communal garden.

Block C:

- Energy Centre relocated on lower ground floor ;
- Substation moved into block C;
- In order to maintain the same number of bikes, the layout has been adjusted slightly and adequate space still remains.
- As the entrance is off a new location, the finished floor level of the cycle store has increased to +20.150 which allows for approximately 2.7M floor to ceiling – so double stacking cycle parking spaces will still fit. (+325mm Ceiling zone over the 2.7M) – Included the revised section with the floor adjustment in the drawing package.
- Indicated the louvred door, to be similar as the bin store door adjacent for continuity.
- Landscaping: Updated to take account of minor plan changes as above

Environmental Statement

- 4.15. The application is accompanied by an Environmental Statement (ES). Quod have been instructed to undertake an independent review of the submitted information. The consideration of the environmental effects of the proposed development is discussed in Section 11.
- 4.16. The following topics were scoped into the ES:
- Townscape, and Visual Effects
 - Built Heritage and Archaeology; and
 - Cumulative Effects and Impact Interactions

Programme and Phasing

- 4.17. The scheme proposes a relatively short build period of circa 4 years given the large scale nature of the development. It would be delivered as a single phase of development.
- 4.18. For the purposes of collected CIL, this is a phased development and will not relate to the phasing set out above. A specific CIL phasing condition will be applied to permission if approved.

5. RELEVANT SITE HISTORY

A. Planning

- 5.1. The following table provides a summary of relevant planning history for the application site:

Reference	Description of Development	Decision
192584	Building, involving internal alterations for the removal of internal partitions, alterations to the annex of the building and external alterations for the installation of symmetrical ramps on the south main entrance. Replacement of the Water Fountain	Granted on 26/11/2019

	Basin, together with landscaping works and provision of new openings in the east and west elevations of the building at basement level. Building works linked to Listed Building Consent Application Number 192585.	
192585	Listed Building Consent Application for the refurbishment of the Town Hall Building involving changes to the internal layout; the reconfiguration of the reception area; opening of Annex at first floor level; removal of internal partitions and rooflight; replacement of second floor rooflight, internal ramps and Council Chamber furniture; installation of new cycle and refuse stores; installation of new openings at basement level to provide access to external ramps; extensions of lift access to basement level and replacement of water fountain with new water features and associated landscaping works to re-configure the Civic Square. LBC application linked to Planning	Granted on 26/11/2019
174331	Refurbishment works to clock tower including installation of internal timber platform, replacement of internal existing steel vertical ladders with 3 aluminium ships ladders and repainting of tower lanterns and base railings.	Granted on 14 th March 2018
170441	Listed building consent for the demolition of the former Sports and Social Club, Fir Tree House and Chestnuts Hall and landscaping of the areas. Demolition of all the garages at the rear of the Assembly Hall and along the boundary with Waltham Forest College and provision of 28 parking spaces.	Listed Building Consent issued 6 th December 2017
2013/0654/LB	Listed Building Consent Application for the installation of CCTV camera, one pole mounted in grounds, three attached to Town Hall and one attached to Assembly Hall.	Listed Building Consent issued 30 th August 2013

2012/1472/LB	Listed Building Consent Application for the installation of two sets of additional (internal) doors to create fire lobby.	Listed Building Consent issued 21 st January 2013
2012/0502/LB	Listed Building Consent Application for the installation of Olympic Games banners on the Town Hall and Assembly Hall.	Listed Building Consent issued 27 th July 2012
2012/0499/ADV	Advertisement Consent Application for the installation of non-illuminated Olympic Games banners on the Town Hall and Assembly Hall.	Advert Consent issued 16 th June 2012
2012/0186/LB	Refurbishment of Reception Area including demolition of existing partitions, formation of new reception desk and meeting rooms, re-location of doors to side corridors and new internal main entrance doors.	Listed Building Consent 18 th April 2012
2011/0419/LA	Alterations and removal of internal walls at ground and second floor levels.	Granted on 10 th October 2011
2011/0419/LA	Alterations and removal of internal walls at ground and second floor levels.	Granted 10 th October 2011
2011/1515/LA	Installation of solar panels on the roof.	Granted 5 th January 2012
2011/1257/LB	Internal alterations at second floor to provide new toilets, demolition of partitions and repartitioning to provide staff room and meeting rooms.	Listed Building Consent issued 5 th April 2012
2007/0477/LB	Formation of accessibility ramp and provision of a glass screen to Council Chamber annexe.	Listed Building Consent issued 1st February 2011
2007/0253/LB	Installation of new wall mounted emergency lighting in ground and second floor corridor area	Listed Building Consent issued 1 st August 2007
2007/0856/LB	Installation of new corridor doors at first and second floors	Listed Building Consent issued 2 nd August 2007

- 5.2. As of June 2020, construction commenced on Phase 1 of the restoration and regeneration works to the Town Hall Campus site to implement the above consents (192584 & 192585) this work was completed June 2021 and formerly open in July 2021 and is now known as Fellowship Square. It is noted that this Phase 2 proposed development does not seek to alter or amend the Town Hall or any listed buildings on the site as whole.

Pre-Application

- 5.3. Prior to the submission of this planning application, the applicant has been involved in an extensive programme of pre-application discussions with officers since June 2020. This has included engagement through a Planning Performance Agreement (PPA). This has included several meetings with a number of specialist officers at the Council, including highways, drainage, energy, planning, secure by design, urban design and waste.
- 5.4. An extensive programme of topic-based meetings and workshops has been held with Officers of the Council through a Planning Performance Agreement ("PPA"). The team have worked with the appointed Planning, Design and Highways officers to develop the proposals in respect of design and heritage matters. In addition, the scheme was presented to the Council's Design Review Panel in October 2020.
- 5.5. The programme of topics, matters discussed, and meetings dates are as follows. It is noted that the project initially commenced pre-application in January however due to the Covid-19 crisis, was paused until resuming again in September 2020:

Meeting	Topics	Date
LBWF Pre-application Meeting NO. 1	Introductory meeting	30/01/2020
LBWF Pre-application Meeting NO. 2	Masterplan/Highways/Servicing	26/03/2020
LBWF Pre-application Meeting NO. 3	Restart meeting	03/09/2020
LBWF Pre-application Meeting NO. 4	Site Design, Highways/Waste/Access	15/09/2020
LBWF Pre-application Meeting NO. 5	Highways/Active Travel Hub	08/10/2020
LBWF Pre-application Meeting NO. 6	Civic Building Review	17/12/2020
LBWF Pre-application Meeting NO. 7	Site-Wide Design Review	12/01/2021
LBWF Pre-application Meeting NO. 8	Highways and Transport Focus	22/01/2021
LBWF Pre-application Meeting NO. 9	Heritage Review	11/02/2021
LBWF Pre-application Meeting NO. 10	Pre-Submission Planning Catch Up	22/02/2021

- 5.6. The applicant met with the GLA and TfL officers on 23rd September 2020, and written feedback was received.
- 5.7. With regards to the site's Epping Forest SAC status, there has been on-going discussions and consultation with LB Waltham Forest and Natural England. Alongside

regular email and telephone contact, a formal meeting was held in January 2021 between the applicant's ecology advisers (Stantec), Natural England and LB Waltham Forest officers to discuss and agree the proposed package of mitigation to be provided as relevant to the proposal.

- 5.8. With regards to the designation of Chestnuts Field as a recognised Playing Field by Sport England ("SE"), a number of meetings were held with SE also. Meetings took place on the 10th February 2020 and 24th September 2020 regarding design and layout, whilst a further meeting was held on 21st October 2020 to discuss flood alleviation strategy across the field.
- 5.9. Given the presence of listed buildings on and adjoining the subject site, the consultant team approached Historic England ("HE") for discussion and comment on the scheme. On the 1st September 2020 Historic England advised in writing that:
- As the site lies outside any Conservation Area and is unlikely to affect the setting of any nearby conservation areas or Grade II* or I Listed Buildings; and
 - The Grade II Listed civic buildings do not form part of the proposals
- 5.10. The proposal would fall outside the remit of HE and no further comment/input from them would be required. Nonetheless, as noted in above, a number of meetings were held with the LPA including with their Heritage and Urban Design officers to inform the proposal with regards to its relationship to Listed Buildings and Monuments.
- 5.11. The applicant has also engaged with the GLA through its formal pre-planning application advice service. This involved one meeting with planning, urban design and energy officers yet no formal pre-application written advice was received. The GLA verbally welcomed landscape and residential-led development and the re-use of the site to provide new housing, and the weight split of affordable housing in favour of low-cost rent was also supported. The GLA in their stage 1 report are supportive of the principle of development and provided further advice on design heritage, affordable housing, energy policy, fire strategy, transport and highways matters.
- 5.12. In addition to the above, officers and the applicant organised a Design Review by the Design Council. The review was held on 13 October 2020 and was attended by members of the project team, officers and the CAGE Design Advice Panel.
- 5.13. To summarise Design Council's response, the panel were strongly supportive of the principle of the development and the transformational nature of the wider townscape. They advised that the length of Block B and the height of block C could be revised to reduce impact on setting of the Town Hall Listed Building. They concluded that the benefits of transformational development and optimising housing potential were acknowledged as significant.

6. PUBLIC CONSULTATIONS

Pre-application stage

- 6.1. The applicant had also headed-up a programme of public / stakeholder engagements and the application had been the subject of extensive pre-application consultation with LBWF including Planning, Highways, Waste Management, Landscape and Sustainability officers and is subject to a PPA. Between October 2020 and January 2021, a programme of public consultation activities was rolled out to the local community, including:

- 1 Digital walkabout
 - 9 one-to-ones
 - 2 Online exhibitions
 - 2 Online design discussions
 - Social media polls
 - Online mapping feedback
 - Online feedback surveys
- 6.2. A total of 2,027 people shared their views and helped to shape the proposals, of which over 84% were directly from the London Borough of Waltham Forest.
- 6.3. As well as the general public, a number of stakeholders and local community groups were directly approached to provide the opportunity to input into the development of the proposal, including:
- Waltham Forest College
 - Chestnuts Farm Allotments
 - LBWF Culture Team
 - Lloyds Park, Head of Green Spaces
 - YMCA
 - Feel Good Centre
 - Wood Street Walls
 - Cycle Campaign
 - LBWF Head of Market Traders
 - All Councillors and Ward Councillors
 - LBWF Senior Officers
- 6.4. A full schedule of all consultation activities, dates, and respondees is including within the submitted Statement of Community Involvement. The relevant objection comments are summarised in the 'Objections Received' table below.
- 6.5. The representations relating to the issues of concern raised are detailed in the table below and are also matters which are addressed within Section 10 'Assessment' and Section 11 'Environmental Statement' of this report.

Planning application stage

- 6.6. The planning application consultation to residents took place on 20th April 2021. Over 4,000 addresses were notified of this planning application. 10 site notices were displayed around the site and advertised in Waltham Forest Guardian.
- 6.7. Over the course of the determination period, revised information was submitted in support of the application to address comments raised during the consultation process. This included clarifications and further information to the Environmental Statement (ES), Transport Assessment, Outline Construction Logistics Plan, Circular Economy, and energy clarifications, and minor changes to layout and design to address comments raised by Waltham Forest College, LBWF Highways Development, TFL, CAE, LBWF Waste, and LBWF Nature Conservation. All the revised information has been published on the Council's planning application page, subject to reconsultation on the 22nd July 2021 and has been reviewed by the relevant consultees.
- 6.8. The consultation and reconsultation processes resulted in a total of 13 objections. These are summarised in the table below.

Objection	LPA Response
<i>Loss of Views, Outlook, Privacy and Light</i>	
<p>Block J would be near the rear gardens of Farnan Road and lead to a loss of amenity.</p> <p>Loss of light</p>	<p>It should be noted that views are not a planning consideration as there is no right to a view. However, the outlook with regard to separation distances and outlook have been assessed in the design and ensure outlook, light and privacy are preserved within an urban context.</p> <p>A Daylight, Sunlight and Overshadowing report has been scrutinised as set out in the assessment section of this report. The results are reflective of larger scale building in an urban area and loss to neighbouring amenity would be minor adverse impact, and broadly it would have negligible impact.</p>
Overdevelopment	This has been considered in the Design section of the report.
Building would be cramped into a small area and does not fit well with the existing buildings.	This has been considered in the Design section of the report.
Servicing and Delivery concerns with regard to waste collection.	This has been considered in the Waste Management section of the report.
Townscape impacts	This has been considered in the Design section of the report.
Car Parking	<p>The development would be car free except for provision for disabled people and deliveries only and therefore aims to reduce vehicle traffic within the local road network. The is in view of the provide an active travel approach in the area and borough wide to increase walking and cycling.</p> <p>Cycle provision and active travel are important aspiration for the development and the borough as a whole.</p>

	A s.106 contributions and s.278 legal agreement will be secured to highway and pedestrian safety and enhancements to active travel .
<i>Crime and Anti-social behaviour</i>	
Lead to more crime, with more people and blight the area.	The Metropolitan Police have been consulted on this planning application as well as the CTSA.
Risk of overpopulation and associated increased in antisocial behaviour.	The SBD team have been working on the design of the scheme and a condition would be imposed to ensure SBD accreditation.
<i>Lack of Infrastructure / Impact on Existing Infrastructure</i>	
The development should respond to community facilities that are needed within the area, particularly health centres and schools. Lack of community facilities.	Flexible use class (E and F) will allow for a variety of uses that could include retail and community/health uses that reflect the changing nature of market needs and supply. A Retail and Commercial Space Strategy obligation will be secured by s.106 to ensure the uses are in the interest of diversity and local community needs. The Education section of this report discusses school infrastructure and contributions secured by s.106.
<i>Waltham Forest College (WFC)</i>	
Loss of light Access arrangements Loss of trees Substation Signage	The Council have engaged with the WFC on a number of occasions (in person) and since then revisions have been made to the scheme to relocate the substation and reduce transport conflicts and ongoing concerns. Whilst changes have been made, WFC maintain a loss of light, loss of trees and access arrangements in terms of vehicular and pedestrian conflict remain concerns. Signage concerns can be mitigated by imposing a condition as part of the wayfinding provision.

	The proposed arch linking the site has been revised to relocate the cycle store doorway and staircase has been removed.
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7. OTHER CONSULTATIONS

Internal and External Representations Received

7.1. LBWF Consultation Responses' below lists the responses received from Waltham Forest Council consultees.

LBWF Consultation Responses (including all Councillors)

LBWF Consultees	Comments
Design and Conservation (Design)	Please refer to the assessment section of the report.
Design and Conservation (Conservation)	There will be some degrees of harm arising from the proposed development, with regards heritage assets. This harm will be indirect and less than substantial in terms of both listed buildings and conservation areas and will consequently need to be weighed against any public benefits of the wider scheme, so as to be justified.
Environmental (Air Quality) Health	<p>S106 contribution of £87,680 towards implementation of the Council's Air Quality Action Plan.</p> <p>Conditions recommended regarding Air Quality Neutral Assessment. It is expected that the trips generated from this car park would make the development air quality neutral.</p> <p>Other conditions and informatives also recommended relating to emissions from nonroad mobile machinery and air quality dust management</p>
Environmental Health (Contaminated Land)	No objection subject to conditions involving asbestos and contamination.

Environmental Health (Noise)	No objection subject to conditions.
Families (Education)	No objection subject to conditions and a s.106 contribution towards of £176,607.15 towards providing additional secondary places.
Families & Homes (Public Health)	No response received at the time of writing. The proposal is expected to fall within standard noise parameters, which would be subject to separate legislation.
Highway Development	<ul style="list-style-type: none"> • A S106 contribution of £7,500.00 is required towards CLP monitoring. • A S106 contribution of £400,000 is required towards safety improvement for walking and cycling in line with TfL's healthy streets objectives, improving road safety and connectivity for the new occupants of this site. • A S106 contribution of £150,000 is required towards the delivery of the Flood Mitigation Scheme proposed within Chestnuts Field. • A S106 contribution of £50,000 is required towards Active Travel Behaviour Change Initiatives for the new residents, employees, visitors, and families visiting and utilising the new development. To ensure a legacy of significant legacy of behaviour change is implemented and sustained bespoke training for families and staff should be offered due to the car free nature of residential development and aspirations for commercial element. • A S106 contribution of £20,000 towards wayfinding in the surrounding area. • A S106 contribution of £50,000 is required to review, consult and possibly implement modifications to the 4 existing CPZs in the surrounding area in order to suitably mitigate any adverse parking impact generated by the development. • A S106 contribution of £20,000 is required towards parking enforcement to assess and review the essential user exclusion zone. • A S106 contribution of £20,000 is required towards parking enforcement for increased resources to facilitate enforcement presence in the surrounding roads due to the impact from the new development <p>The site will be car free; residents will not be entitled to parking permits for any CPZ</p>

	<p>S278 works will be required upon completion of the works relating to the development prior to occupation. An application for Highway Works will be required. Extent of works will include but are not limited to:</p> <ul style="list-style-type: none"> • A review of expected pedestrian movements, and accommodation for these in a new highway layout • A review of expected cycle movements accessing the site, taking into account the new cycle entrances and a redesign to ensure opportunities for conflict are mitigated by design. • Renewal of the footway on the frontage of the site • Blended crossing at the vehicle entrance along Farnan Ave. Suitable provisions should be made for pedestrians and cyclists accessing the site from the North. • Suitably raised entrance at the vehicle entrance along Forest Road. • Upgrades to public lighting, taking into consideration the increased pedestrian and cycle movements. Realignment may be required due to the resultant road space redistribution. • Works will be carried out by the council and funded by the developer.
Housing	GLA confirm the scheme would meet fast track criteria at 50% affordable housing with the tenure split assessed by the Council in the section of this report.
Housing (Accessibility)	Officers shall consider the acceptability that 10% of the proposed units would be wheelchair adaptable.
Neighbourhood and Commercial Services (Refuse and Recycling)	No response received at the time of writing. A planning condition to any planning permission is recommended regarding further details of servicing, deliveries and waste management prior to first occupation of any part of the development to ensure this development would be appropriately managed.
Planning Policy	The principle of development is strongly supported in line with the emerging site allocation for transformational development of the site for housing and mixed-use development.

Planning Policy (Transport Policy)	<p>With regard to disabled parking, the arrangements to provide just over 3% disabled parking spaces is acceptable.</p> <p>Cycle provision is considered acceptable</p> <p>A Travel Plan should be secured by s.106 Legal Agreement to identify opportunities for the effective promotion and delivery of sustainable transport initiatives.</p>
Regeneration and Growth Employment, Business and Skills)	Employment and Skills Plan to be agreed with targets in place and financial contributions required and agreed if targets are not met on a phase by phase basis.
Social Services Children Services (Early Years)	There are no major gaps in the demand for childcare in this ward, with some surplus of spaces in neighbouring wards. The scheme has made provision to provide a nursery / creche which will increase early years childcare capacity and the operator should be secured by S.106 legal agreement.
Strategic Regeneration (Sustainability and Energy)	No objection subject to securing the following Heads of Terms by s.106 legal agreement as headlined at the start of this report.
Trees – Nature and Conservation	No objection subject to planning conditions seeking replacement and enhancing with regard to the loss of trees.
All councillors and Wards councillors	No response received at the time of writing.

- 7.2. LBWF Consultation Responses' lists the responses received from Waltham Forest Council consultees set out in the table below:

External and Statutory Consultees	Comments
20 th Century Society	Object to the demolition of the former Magistrates Court Building due to the loss of what we consider to be a non-designated heritage asset which makes a positive contribution to the setting and

	significance of the listed buildings on the site. This is discussed in the Heritage section of the report.
Ancient Monuments Society	Support for the regeneration of the wider site and the introduction of new buildings and uses to enliven the area. Whilst they support the opportunity for new buildings within the wider area and generally support the design approach, we consider that the extent of new buildings proposed to the east and west of the Town Hall results in an over-massing of the site. The new residential buildings encroach on the currently open setting of the Town Hall and Assembly Hall, reducing their dominance in the landscape and therefore causing considerable harm to their overall significance. This is discussed in the Heritage section of the report.
Epping Forest (Special Area of Conservation) - Conservators of London	Initial response received raising outline concerns that the SANG provision did not go far enough and requesting further information. No response has received following additional information being provided. In the absence of final comments, Natural England's response is relevant.
Environment Agency	Based on a review of the submitted documents and the site location, there are no environmental constraints on site that fall within our remit as a statutory consultee. Therefore, no comments to make on this planning application.
Greater London Authority	<p>Whilst the proposal is strongly supported in principle, the application does not currently comply with the London Plan and Mayor's Publish London Plan for the reasons set out below. Where the associated concerns are addressed, the application may comply with the London Plan and the Mayor's Published London Plan:</p> <ul style="list-style-type: none"> • Housing/affordable housing: Currently the affordable housing quantum is 50% by habitable room so is eligible for the Fast Track route. The overall quantum, and the quantum of London Affordable Rent and Intermediate units is subject to confirmation from the borough that they accept the tenure split which does not meet local policy, and

	<p>confirmation of the affordability and eligibility of the affordable products.</p> <ul style="list-style-type: none"> • Urban design and heritage: The layout of the scheme is generally supported however the height and design of Block C is a concern in view of the Listed Buildings. Appropriate conditions securing design quality are needed. The proposals could result in less than substantial harm of a low level to heritage assets. This harm is capable of being outweighed by public benefits once the affordable housing provision is confirmed to be at a policy compliant level. • The reduction in car parking and measures to encourage cycle use are supported and further cycle connections would be encouraged. Appropriate conditions and section 106 obligations should be secured. • Sustainable Development: Further information on energy, drainage, urban greening and circular economy required. • In terms of flood risk, concerns were raised as the site partly falls within a critical drainage zone. Concerns have been overcome and the GLA are now satisfied with these mitigations.
Historic England	No comment to make.
Historic England (Greater London Archaeological Advisory Service)	Recommend archaeological conditions and informatives.
London Fire Brigade	<p>Satisfied with the proposals in relation to the fire precautionary arrangements subject to condition:</p> <p>“Additional measures and information may be necessary in order to fulfil the firefighting access arrangements for Block H. These measures may include the following, provision of sprinkler system/firefighting shafts/dry rising mains, which will be subject to approval by the Fire Authority.”</p>
London Wildlife Trust	No response received at the time of writing.

Metropolitan Police – Design Out Crime Prevention Officer	No objection subject to the recommendation of a condition to secure a Certificate of Compliance to the relevant Secured by Design Guide(s) or alternatively achieve Crime Prevention Standards.
Natural England	Based on the plans submitted, Natural England considers that the proposed development will not have significant adverse impacts on designated sites and has no objection. Appropriate mitigations (SAMMS and SANGS) to be secured to address the effect on the integrity of Epping Forest Special Area of Conservation. Advise that an appropriate planning condition or obligation is attached to any planning permission to secure these measures.
Conservators - City of London	<p>HRA for the scheme indicates that the project alone and In-Combination with other developments is likely to have an impact on the Epping Forest SAC. A SANG provision has been allocated for this development.</p> <p>The Conservators do not feel that this proposed provision goes far enough to effectively absorb enough levels of recreational impact that would generate from the development away from the Epping Forest SAC. Following this, the SANGS strategy and its enhancements have been sent and no comments have been received since.</p>
North London Waste Authority	No response received at the time of writing.
Network Rail	No objection subject to informatives to safeguard Network Rail land.
Sport England	No objection raised to the loss of an area of open space due to meeting the ' <i>exception test 3</i> ' given the proposal only affects land incapable of forming a playing field and does not compromise or prejudice the remaining Chestnuts Field area in any way.

Thames Water	Waste and Water comments to be secured either as conditions or informatives.
Transport for London (TfL)	<p>No objection in principle. The Active Travel zone (ATZ) assessment is acceptable and appropriate. The mobility hub is welcomed and should be secured by condition or s1.06 legal agreement.</p> <p>Seeking £250,000 contribution towards the upgrade at Walthamstow Central station.</p> <p>Loss of parking strongly supported and disabled parking and car club and visitors provision is acceptable. Active EVCP is compliant with policy.</p> <p>A full detailed Construction Logistics Plans and Delivery and Servicing Plan should be secured by conditions.</p>

8. DEVELOPMENT PLAN

- 8.1. Section 70(2) of the Town and Country Planning Act 1990 (as amended) sets out that in considering and determining applications for planning permission the local planning authority must have regard to:
- the provisions of the development plan, so far as material to the application;
 - any local finance considerations, so far as material to the application; and
 - any other material considerations.
- 8.2. Section 38(6) of the Planning and Compulsory Purchase Act (2004) makes it clear that 'if regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise'. The development plan for Waltham Forest comprises the Core Strategy, the Development Management Local Plan, and the London Plan. The NPPF does not change the legal status of the development plan.

The London Plan (2021)

- 8.3. The new London Plan is the overall strategic plan for London, and it sets out a fully integrated economic, environmental, transport and social framework for the development of the capital from 2019 to 2041.
- 8.4. The policies relevant to this application are considered to include and not limited to:
- D1 London's form, character and capacity for growth
 - D2 Infrastructure requirements for sustainable densities
 - D3 Optimising site capacity through the design-led approach
 - D4 Delivering good design
 - D5 Inclusive design
 - D6 Housing quality and standards
 - D7 Accessible housing

- D8 Public realm
- D9 Tall Buildings
- D11 Safety, security and resilience to emergency
- D12 Fire Safety
- D13 Agent of Change
- D14 Noise
- E1 Offices
- E2 Providing suitable business space
- E3 Affordable workspace
- E9 Retail, markets and hot food takeaways
- E11 Skills and opportunities for all
- G1 Green Infrastructure
- G4 Open Space
- G5 Urban Greening
- G6 Biodiversity and access to nature
- G7 Trees and woodlands
- G9 Geodiversity
- GG1 Building strong and inclusive communities
- GG2 Making best use of land
- GG3 Creating a healthy city
- GG4 Delivering the homes Londoners need
- GG5 Growing a good economy
- GG6 Increase efficiency and resilience
- H1 Increasing housing supply
- H4 Delivering affordable housing
- H5 Threshold approach to applications
- H6 Affordable housing tenure
- H10 Housing size mix
- HC1 Heritage conservation and growth
- HC3 Strategic and local views
- HC5 Supporting London's culture and creative industries
- HC6 Supporting the night-time economy
- SD1 Opportunity Areas
- SD3 Growth locations in the Wide South East and beyond
- SD10 Strategic and local regeneration
- S1 Developing London's social infrastructure
- S2 Health and social care facilities
- S3 Education and Childcare facilities
- S4 Play and informal recreation
- S5 Sports and recreation facilities
- SI1 Improving air quality
- SI2 Minimising greenhouse gas emissions
- SI3 Energy infrastructure
- SI4 Managing heat risk
- SI5 Water infrastructure
- SI6 Digital connectivity infrastructure
- SI7 Reducing waste and supporting the circular economy
- SI12 Flood Risk Management
- SI13 Sustainable drainage
- T1 Strategic approach to transport
- T2 Healthy Streets
- T3 Transport capacity, connectivity and safeguarding

- T4 Assessing and mitigating transport impacts
- T5 Cycling
- T6 Car Parking
- T6.1 Residential parking
- T6.3 Retail parking
- T6.5 Non-residential disabled persons parking
- T7 Deliveries, servicing and construction
- T9 Funding transport infrastructure through planning
- DF1 Delivering of the Plan and Planning Obligations

Waltham Forest Local Plan Core Strategy (2012)

- 8.5. The Waltham Forest Core Strategy (2012) was adopted on 1st March 2012.
- 8.6. The Core Strategy contains 16 policies designed to deliver the Council's vision for the physical, economic, environmental and social development of the Borough. These policies will be used to direct and manage development and regeneration activity up to 2026.
- 8.7. The policies considered relevant to this application are as follows:
- CS1: Location and Management Growth
 - CS2: Improving Housing Quality and Choice
 - CS4: Climate Change
 - CS5: Enhancing Green Infrastructure and Biodiversity
 - CS6: Promoting Sustainable Waste Management and Recycling
 - CS7: Developing Sustainable Transport
 - CS8: Making Efficient Use of Employment Land
 - CS10: Creating More Jobs and Reducing Worklessness
 - CS13: Promoting Health and Well Being
 - CS15: Well Designed Buildings, Places and Spaces
 - CS16: Making Waltham Forest Safer
 -

Waltham Forest Local Plan Development Management Policies (2013)

- 8.8. The Local Plan Development Management Policies Document was adopted in November 2013. This sets out the borough-wide policies that implement the Core Strategy and delivering the long term spatial vision and strategic place shaping objectives. There is an emphasis on collaboration and a positive proactive approach to reaching a balance agreement that solves problems rather than a compromise that fails to meet objectives.
- 8.9. The following policies are relevant in this case:
- DM1 – Sustainable Development and Mixed Use Development
 - DM2 – Meeting Housing Targets
 - DM3 – Affordable Housing Provision
 - DM5 – Housing Mix
 - DM7 – External Amenity and Internal Space Standards
 - DM10 – Resource Efficiency and High Environmental Standards
 - DM11- Decentralised and Renewable Energy
 - DM13 – Co-ordinating Land use and Transport
 - DM14 – Sustainable Transport Network
 - DM15 – Managing Private Motorised Transport
 - DM16 – Parking

- DM17- Social and Physical Infrastructure
- DM18 – Strategic Industrial Locations
- DM19 – Borough Employment Areas
- DM21 – Improving Job Access and Training
- DM23 – Health and Well Being
- DM24 – Environmental Protection
- DM29 – Design Principles, Standards and Local Distinctiveness
- DM30 – Inclusive Design and the Built Environment
- DM31 – Tall Buildings
- DM32 – Managing Impact of Development on Occupiers and Neighbours
- DM33 – Improving Community Safety
- DM34 – Water
- DM35 – Biodiversity and Geodiversity
- DM36 – Working with Partners and Infrastructure

9. MATERIAL PLANNING CONSIDERATIONS

National Planning Policy Framework (2021)

- 9.1. The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these are expected to be applied. It is a material consideration in planning decisions. It contains a presumption in favour of sustainable development, described as at the heart of the framework.
- 9.2. For decision-taking the NPPF states that the presumption means *"approving development proposals that accord with an up-to-date development plan without delay"* and where there are no relevant development plan policies, or the policies which are most important for determining the application are out of date, granting permission unless *"...any adverse impacts would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole"*.
- 9.3. The NPPF gives a centrality to design policies; homes should be locally led, well designed, and of a consistent and high quality standard. Local planning authorities (LPAs) are to make sure that the quality of approved developments does not materially diminish 'between permission and completion, as a result of changes being made to the permitted schemes'.
- 9.4. The specific policy areas of the NPPF considered to be most relevant to the assessment of this application are as follows:
- Delivering a sufficient supply of homes
 - Building a strong, competitive economy
 - Promoting healthy and safe communities
 - Promoting sustainable transport
 - Making effective use of land
 - Achieve well-designed places
 - Delivering a wide choice of high-quality homes

The Town and Country Planning (Environmental Impact Assessment) Regulations 2017.

- 9.5. The regulations came into force on 16th May 2017. The aim of Environmental Impact Assessment is to protect the environment by ensuring that a local planning authority when deciding whether to grant planning permission for a project, which is likely to have

significant effects on the environment, does so in the full knowledge of the likely significant effects, and takes this into account in the decision making process.

The Town and Country Planning and Infrastructure (Environmental Impact Assessment) (Amendment) Regulations 2018.

- 9.6. Minor updates to the EIA Regulations 2017.

Department for Communities and Local Government Technical Housing Standards – Nationally Described Space Standard (2015)

- 9.7. This standard relates to the internal space within new dwellings and is suitable for application across all tenures. It sets out requirements for the Gross Internal Area (GIA) of new dwellings at a defined level of occupancy as well as floor areas and dimensions for key parts of the home including bedrooms and storage.

The London Plan Housing SPG (2016)

- 9.8. This supplementary planning guidance (SPG) focuses on affordable housing and viability. It includes four distinct parts: background and approach; the threshold approach to viability assessments and detailed guidance on viability assessments.

London Plan Affordable Housing and Viability SPG (2017)

- 9.9. This supplementary planning guidance (SPG) focuses on affordable housing and viability. It includes four distinct parts: background and approach; the threshold approach to viability assessments and detailed guidance on viability assessments.

Waltham Forest Local Plan Urban Design SPD (2010)

- 9.10. This document has the aim of raising the quality of design within the Borough. The core principles underlying the advice in the SPD are Inclusive Design and the social model of disability.

Inclusive Housing Design SPD (2011)

- 9.11. The core principles underlying the advice in the SPD are Inclusive Design and the social model of disability.

Waltham Forest Affordable Housing and Viability SPD 2018

- 9.12. This supplementary planning document (SPD) has been prepared to provide further detailed guidance on affordable housing and viability. The document provides further guidance on how the Council will take viability into account when considering planning applications and what supporting information applicants will be required to produce. The Council does not intend to apply this guidance retrospectively to any planning applications being processed or determined.

Waltham Forest Planning Obligations SPD (2017)

- 9.13. This document seeks to provide transparent, clear and consistent information for the negotiation of planning contributions.

Natural England – Epping Forest Special Area of Conservation

- 9.14. Natural England issued interim advice on 6th March 2019 in relation to the Epping Forest Special Area of Conservation (SAC) Mitigation Strategy and the Habitats Regulations. The advice applies to all residential development within the extended Zone of Influence, which includes the Local Planning Authority's area. The development is therefore liable to mitigation measures on any impact on the Epping Forest SAC which will be secured by an appropriate financial contribution.

Shaping the Borough – London Borough Waltham Forest Draft Local Plan Part One (Submission Draft April 2021)

- 9.15. The draft Local Plan underwent Regulation 18 public consultation between July 2019 and September 2019 and consultation on the proposed Submission Version between 26th October 2020 and 14th December 2020. The plan was submitted to the Secretary of State on 30th April 2021. This is an early stage of the plan making process and less weight will be given to its policies.
- 9.16. The draft new Local Plan proposes to be a “combined” document comprising 12 thematic policies and a revised spatial strategy, splitting the borough into North, South and Central Waltham Forest.
- 9.17. The draft Local Plan clearly sets out the Council's growth agenda which seeks to facilitate the sustainable delivery of 27,000 new homes and 46,000sqm of employment floorspace over the next plan period. The draft policies relating to housing type and mix are reflective of the London Plan (2021).

Shaping the Borough – London Borough Waltham Forest Draft Local Plan Part Two Site Allocations (Regulation 18 Draft September 2020)

- 9.18. The Site Allocation Document underwent Regulation 18 Public consultation from 25th September 2020 to 14th December 2020. The Submission version of the document was approved by Cabinet on 8 July 2021; consultation is expected to take place in September/October 2021, after which the plan will be submitted to the Secretary of State for Examination. This is an early stage of the plan making process, and less weight will be given to its policies. The application site relates to SA38 allocation. The proposed allocation seeks a minimum of 450 new homes (50% affordable housing) and non-residential floorspace to include nursery / creche, new open space and office space.

Forest Road Corridor Framework

- 9.19. The Forest Road Corridor has been identified as a strategic location in the Council's emerging Local Plan, it sets out a vision for the area and will provide informal planning guidance.

Local Finance Considerations

- 9.20. Local Finance Considerations are a material consideration in the determination of all planning applications. Local Finance Considerations can include either a grant that has been or would be given to the Council from central government or money that the council has received or will or could receive in terms of Community Infrastructure Levy (CIL).

- i. There are grants which have been or will or could be received from central government in relation to this development.
- ii. The Council has not received but does expect to receive income from LBWF CIL in relation to this development.
- iii. The Council has not received but does expect to receive income from Mayoral CIL in relation to this development.

10. ASSESSMENT

10.1. The main issues which shall be addressed within this report are:

- A. Principle of Development
- B. Affordable Housing and Viability
- C. Housing – tenure and mix
- D. Density of development
- E. Standard of residential accommodation
- F. Residential amenity
- G. Amenity
- H. Design of the development
- I. Impact on heritage assets
- J. Transport and highways
- K. Waste management
- L. Education and healthcare provision
- M. Trees, landscaping and ecology
- N. Sustainable design and energy efficiency
- O. Environmental impact
- P. Safety and security

- 11. The Environmental Statement
- 12. Planning Obligations; and
- 13. Additional Considerations;
- 14. Conclusions
- 15. Recommendations

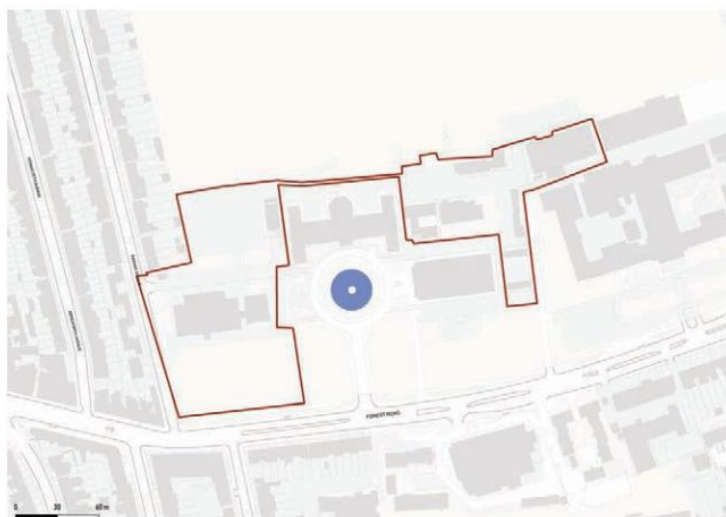
A. PRINCIPLE OF DEVELOPMENT

- 10.2. The National Planning Policy Framework (NPPF) (2021) places a presumption in favour of ‘sustainable development,’ which it states should be a “*golden thread*” running through plan and decision making. These principles are reflected in Policy CS1 of the Waltham Forest Local Plan (WFLP) Core Strategy (2012) and Policy DM1 of the Waltham Forest Local Plan Development Management Policies (2013).
- 10.3. In the context of making effective use of land, the NPPF (2021) states that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses. It further states that planning policies and decisions should encourage multiple benefits from both urban and rural land (including through mixed use schemes), should give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and should promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively. The NPPF (2021) recognises it is important that needs for retail, leisure and other main town centre uses are met in full and are not compromised by limited site availability.

- 10.4. Policy SD1 of the London Plan (2021) related to Growth Corridors and Opportunity Areas and states that these areas should realise their growth and regeneration potential.
- 10.5. Policy SD6 of the London Plan (2021) states that the vitality and viability of London's varied town centres should be promoted and enhanced by ensuring town centres are the primary locations for commercial activity beyond the CAZ and important contributors to the local as well as London-wide economy.
- 10.6. Policy E9 of the London Plan (2021) supports the development of additional convenience shopping facilities to serve existing or new residential communities, provided that this is in line with London Plan Policy SD7 on town centres. Alongside Paragraph 86 of the NPPF, London Plan Policy SD7 requires that significant retail, office and leisure uses should be located within town centres and if they are not, be subject to an impact assessment where more than 2,500 sqm of town centre floorspace is proposed.
- 10.7. Policy H1B 2) d) of the London Plan (2021) supports the redevelopment of surplus public sector owned sites to optimise the potential for housing delivery. The London Borough of Waltham Forest's housing target as set out in the new London Plan, Waltham Forest has a revised ten year target of 12,640 new homes between 2019/20-2028/29. The scheme would provide 433 new residential homes on the site which will contribute positively to Waltham Forest's housing targets.
- 10.8. Policy H1 of the London Plan (2021) states that housing targets optimise the potential for housing delivery on all suitable and available brownfield sites. Criterion b) states that Council should optimise the potential for housing delivery on all suitable and available brownfield sites through their Development Plans and planning decisions, especially the following sources of capacity; mixed-use redevelopment of car parks and low-density retail parks and supermarkets.
- 10.9. Policy H11 of the London Plan (2021) states development that meet the criteria set out in Part B, the affordable housing offer can be solely Discounted Market Rent (DMR) at a genuinely affordable rent, preferably London Living Rent level. Boroughs should take a positive approach to the Build to Rent sector to enable it to better contribute to the delivery of new homes.
- 10.10. Policy 14 of the emerging Waltham Forest Local Plan (2020) states that development in the Forest Road Corridor Strategic Location over the Plan period will deliver a minimum growth targets of 1,250 new homes; place-making principles based on the character and local distinctiveness of the Forest Road Corridor, improves public realm and public spaces across the area and walking and cycling accessibility, connectivity, permeability and legibility to Feel Good Centre Walthamstow Village and Walthamstow Central.
- 10.11. Policy 12 of the emerging Local Plan confirms the Council's commitment to delivering 27,000 new homes by 2035, focusing delivery in strategic locations, opportunity locations and accessible locations around transport hubs. This includes maximizing opportunities to increase the supply of homes on all suitable, appropriate and available sites including developing brownfield land, surplus public sector land and encouraging residential intensification.
- 10.12. Policy CS1 of the Waltham Forest Local Plan Core Strategy (2012) states that growth will be distributed and managed within the borough by focusing regeneration activities within the key Growth Areas (including Walthamstow Town Centre). Policy CS1 further

states that, within these areas, the Council will seek to accommodate growth in housing and jobs, especially for local people.

- 10.13. Policy CS2 of the Waltham Forest Local Plan Core Strategy (2012) states the Council will facilitate sustainable housing growth by prioritising development on previously developed land, particularly unused or underused land, where appropriate, incorporating new homes into mixed use development and making effective and efficient use of land by seeking to optimise housing densities;
- 10.14. Policy CS8 of the Waltham Forest Local Plan Core Strategy (2012) states that the Council will facilitate sustainable economic growth and taking a pragmatic approach to non-designated employment land and premises that can clearly be demonstrated to be surplus to requirements and no longer fit for purpose, so that it can be released for more productive uses. Priority will be given to mixed use developments, especially those that incorporate social infrastructure.
- 10.15. Policy CS10 of the Waltham Forest Local Plan Core Strategy (2012) includes the Council's intention to seek to maximise employment opportunities for residents by supporting infrastructure improvements that enhance residents' access to employment areas via public transport, foot and bicycle.
- 10.16. Policy DM1 B) of the Waltham Forest DMP Local Plan (2013) states that the Council will seek where appropriate a mix of uses in development in the key growth areas, and other appropriate areas in the Borough, including a contribution towards the supply of housing and employment include:
 - iii) Site Opportunity Locations: redevelopment of Site Opportunity Locations will contribute to housing, employment, leisure, retail and social infrastructure uses. Plans for these sites will be detailed in the Area Action Plans and Site Allocation Development Plan Document.
- 10.17. Policy DM17 of the of the Waltham Forest DMP Local Plan (2013) states that development schemes that result in need for social infrastructure to contribute towards supporting upgrading or enhancing existing facilities or providing for new community facilities.
- 10.18. Policy DM20 of the of the Waltham Forest DMP Local Plan (2013) states the Council will support applications for more productive uses in non-designated employment land and is well designed and suitable to its surroundings and that the proposed use would not be better located in a town or district centre.
- 10.19. Following on from the publication of the draft Local Plan, the Borough published its proposed site allocations for achieving the growth set out in the draft Local Plan. Of relevance to this application, Policy Allocation SA38 of the draft LP2 - Site Allocations, identifies the Town Hall Campus consisting of non-designated land as forming the overall proposed allocation as detailed below:



Site Code/ Reference	SA38
Site Address	Magistrates Building, 1 Farnan Avenue, London E17 4NX and Sycamore House, Town Hall Forest Road, Walthamstow, London E17 4SU
	Eastings 537692.6716 and Northings 189880.7702

- 10.20. SA38 Town Hall Campus (Fellowship Square) applies to the site and proposes that development would be supported where it provides a minimum of 450 homes (50% affordable housing) and non-residential floorspace for nursery/creche, new open space, and office space. The associated placemaking plan identifies parts of the site that have sensitive boundaries and a key frontage. See the illustration below:



Key

Site boundary	Proposed green space	Nationally listed heritage asset
Pedestrian and cycle connectivity	Retained / TPO trees	Locally listed heritage asset
Potential for servicing	Proposed tree planting	Key frontage
Proposed station entrance	Potential for height	Special frontage
Enhanced public space	Nearby Site Allocation	Sensitive boundary
Retained / enhanced green space	Conservation Area	Hostile edge

- 10.21. The overall site allocation is defined as “Strategic”, and the approach is to seek “Transformative” redevelopment of the application site. The above “placemaking map” identifies that the site has an opportunity for a ‘special frontage’ to Chestnuts Field and has sensitive boundaries to the neighbouring terraces houses to the west and where any proposed development would directly adjoin Listed assets.

Agent of Change

- 10.22. Policy D13 of the London Plan (2021) states that development should be designed to ensure that established noise and other nuisance-generating uses remain viable and can continue or grow without unreasonable restrictions being placed on them. Furthermore, this policy states that new noise and other nuisance-generating development proposed close to residential and other noise-sensitive uses should put in place measures to mitigate and manage any noise impacts for neighbouring residents and businesses.
- 10.23. The proposals should be assessed according to the Agent of Change principle and designed to incorporate any necessary mitigations and management so as not to inhibit the operations of neighbouring uses, in relation to Waltham Forest College (WFC) in this case. In determining the site’s suitability to accommodate new residential occupiers, a noise investigation was undertaken and the results of this have been compiled into a noise report submitted as part of the planning application and prepared by Stantec.
- 10.24. Most of the noise generation from WFC would be generally contained to the daytime when residential occupiers are more likely to be out and when a higher level of noise can be tolerated. The interface between residential dwellings and education buildings can be successfully managed as is common in urban areas. Such urban relationship between educational and residential buildings is well established across London both in existing and newly built developments.
- 10.25. As part of the revised changes during the application process, the proposed alterations to the easement route would mean the servicing route into the College would be shared with a residential route. Impacts of transport noise on the residential environment have been examined in the submitted noise report, and again with the appropriate material mitigations there would be no undue effects. The change to the easement would not influence whether students would congregate in this area or not, because the easement from Forest Road is a servicing route to car parking and bin storage. Given the desire to open and activate the development site, maintaining the shared access way through the proposed development for both vehicles and pedestrians would enable staff and students to utilise the enhanced public spaces such as Chestnuts Field and the new Fellowship Square.
- 10.26. As such, the applicant has appropriately demonstrated that potential noise generated and the primary noise sources in the immediate vicinity including noise from the Assembly Hall (i.e. concerts, weddings) and vehicle movements/traffic can be mitigated to ensure there would be no significant future conflict of uses/operations. The report recommends noise mitigation methods to the residential dwellings such as sound insulation, and with this, in place, there would be no undue effects here. This can be secured by way of planning conditions.

Loss of Civic floorspace, New Office Accommodation and Flexible Use Class

- 10.27. A key driver of the redevelopment of the site is to provide new Council offices that are fit for modern standards as a continuation of the site-wide benefits of the scheme following

the implementation of Phase 1 restoration and regeneration works to the Town Hall and the Assembly Hall. The proposed development involves the demolition of Sycamore House and Magistrates Building as well as the smaller Chestnut Hall and Laurel House. The latter buildings are located towards the furthestmost NE corner of the site and are modern infill office blocks. The Magistrates is located on the site frontage in the view from Forest Road. It is 1970s addition that was part of the original Hepworth Vision for the site as a whole. However, years later it is considered that the building does not suitably complement the setting of the Town Hall and Assembly Hall Grade II Listed Buildings. Not only in appearance but also in terms of its use of internal space and quality of office accommodation. Officers accept that the building is not fit for purpose and its refurbishment would not be a viable option (based on costs of repairs and maintenance) as after some 50 years its retention is unwarranted. In its place, a new Civic Building that would be fit for purpose knitting in with the Phase 1 works and allow the Council to create a more efficient operating model by consolidating staff into new workspaces and presenting an opportunity to release older sites for redevelopment.

- 10.28. Whilst the proposed development would result in a net loss of some 1,322sqm of civic office floorspace across the site, which is circa 23% of existing provision, the existing Magistrates building has a floor area of circa 3,394sqm and the new Civic building circa 3,767sqm, which represents nearly a 10% uplift. The new civic floorspace would be an open-plan BREEAM 'Very Good' workspace that can accommodate 475 workers and the Council's flexible neighbourhood work model. No civic function would be lost but the main driver is the consolidation of space required to reflect better ways of working. The site is not designated as an employment site for which Policy DM20 seeks to regulate and repurpose undesignated employment land. The proposal would effectively consolidate existing civic uses and allow significant residential development to be delivered as part of the wider public benefits. There would be no resultant loss of employment or indeed civic function, instead, these factors would be augmented and reimagined more efficiently.
- 10.29. In terms of new flexible use class falling under Class E or F of the Use Classes Order (as amended) and the introduction of a café, restaurant and hub in the Civic building, Block J and Block B would provide vitality and function for neighbouring and future residents / workers to enjoy and complements the wider Civic and residential land uses. As such, it is considered that the redevelopment of the non-residential component to be acceptable in principle and is welcomed. This level of provision is supported by officers and the GLA who advise that the use at ground floor for community use and upper floors as general office space is controlled as opposed to other uses under Class E to ensure that there is no future loss of office space without the need for planning permission. A condition will be imposed to secure this, subject to planning approval.

Residential Blocks

- 10.30. The proposed development seeks to utilise previously developed land that the Council has identified as being underutilised and inefficient in its current form. The proposal meets the aspirations of the Council to deliver on its core strategies and aspirations for the Borough, including the delivering of 205 affordable housing units and a total of 433 residential units. A new neighbourhood or campus would be created, whereby the main civic/commercial functions would remain relatively separate from the residential areas. The Civic Building would complete the Hepworth Masterplan and would consolidate the civic functions around the central fountain square at the sites, liberating under-utilised Council land for more appropriate uses and enhanced public realm and placemaking. The residential elements would be arranged around the civic functions and thus would not be a traditional co-location/stacked scheme. Given the expansive overall site size at 7.16ha in area and adequate spatial arrangement ensures that the civic and commercial

functions of the site can continue without constraining the residential functions of the site and vice-versa.

- 10.31. As set out in the accompanying design and access statement, details on functionality, movement, access and security of the site and the mix of uses proposed have been carefully designed and supported by a noise report which demonstrates that all uses on the site can operate without compromising liveability and function. This will be discussed in more detail later on in the report in terms of quality of accommodation and mitigations.
- 10.32. It is a public benefit that the proposal seeks to contribute significantly to housing supply and meeting current and future housing targets for the Borough and across London and deliver 50% affordable housing. The scheme, therefore, complies with Policy DM1 criteria for mixed use development comprising large scale residential as part of the wider mixed use scheme. It would also align with the emerging site allocation (SA38) and as such is considered acceptable in principle. This level of provision is strongly supported by officers and the GLA.

Nursery/Creche

- 10.33. As aforementioned above, the site is allocated within the emerging LP2 site allocation document for residential development and non-residential floor space including nursery / creche, new open space, office space. As such the proposed development has been suitably designed to make provision for these uses including a creche in Block D at ground floor level. This fulfils the need to meet the current and growing demand for social infrastructure as part of the demands of increased population.
- 10.34. In addition to this, the design of the proposed development has also responded to the design and space requirements set by the council. The LWBF has set a brief for the development of the Site which has driven the design of the Proposed Development. In relation to the new civic building, the brief has included the provision of ground floor publicly accessible floorspace (including a Homes and Families hub) with office uses above. This level of provision is supported by officers and the GLA.
- 10.35. This applicant would be obligated to use reasonable endeavours to work with LBWF Early Years to secure a suitable operator with the Council and that an operator is suitable not to be unreasonably withheld or delayed. Countryside only to enter into an agreement with an Ofsted registered operator by way of a s.106 legal agreement.

Open space

- 10.36. London Plan Policy 7.18 'Protecting open space and addressing deficiency' and Policy G4 of the London Plan (2021) support the provision of new publicly accessible open space.
- 10.37. The scheme would introduce 4,438sqm of public realm including 1,948sqm of play space, as part of the comprehensive public realm and landscaping enhancements through the site from Forest Road and towards Chestnuts Field. New and improved permanent public access through the site to new access points on Forest Road. The open space improves permeability and legibility through the site and supports the development's integration into the existing context. This level of provision is strongly supported by officers, TfL, and the GLA.

Chestnuts Field

- 10.38. In terms of the wider proposals, part of Chestnuts Field playing fields towards the southern edge of the grounds would be used for the residential development as part of proposed block B and C as illustrated below and on the highlighted GIS insert:



- 10.39. Chestnuts Field is a designated playing field and therefore is protected and resisted for development by Sports England (SE) unless exceptional circumstances can be demonstrated.
- 10.40. In consultation with SE, following updated plan details showing sufficient space for three pitches on the playing field, this was sufficient to raise no objection from SE. This is with regard to SE's published Playing Field Policy and Guidance (2018) document which outlines the 5 exceptions where it would consider allowing development to any field. In this instance, it is considered that 'Exception 3' as outlined in the policy document is applicable, as follows:

Exception 3:

The proposed development affects only land incapable of forming part of a playing pitch and does not:

- *reduce the size of any playing pitch;*

- *result in the inability to use any playing pitch (including the maintenance of adequate safety margins and run-off areas);*
- *reduce the sporting capacity of the playing field to accommodate playing pitches or the capability to rotate or reposition playing pitches to maintain their quality;*
- *result in the loss of other sporting provision or ancillary facilities on the site; or*
- *prejudice the use of any remaining areas of playing field on the site.*

- 10.41. As illustrated above, the proposed section of uptake is limited in area and is at the very edge of the playing field. Currently, the space to be lost is tucked in-between two access ramps which makes the space unusable as part of the main playing field area. In addition, the area is sloped given the incorporation of the ramps. It makes it relatively unusable as a run-off area also. As such, it is considered that the repurposing of this space does not compromise the playable area of the sports pitch or result in any loss of sport provision or other ancillary sporting facilities. In contrast, it seeks to enhance the space and pitch provision. As demonstrated by the submitted Landscape Strategy, there is sufficient capacity to accommodate three full size pitches on Chestnuts Field.
- 10.42. Meetings were held with SE to discuss the strategy, including the proposed enhancements to the field. As outlined in more detail later in this report, this includes flexible landscaping and layout allowing the pitch to be used for a wide variety of sports, alongside a flood alleviation scheme that would reducing waterlogging of the field and result in a more usable and playable area. The development as a whole would also result in better connections through the site to the field, better wayfinding, passive surveillance and lighting, resulting in a more attractive playing field/open space area and placemaking.
- 10.43. As such, given the proposal only affects land incapable of forming a playing field and does not compromise or prejudice the remaining Chestnuts Field area in any way, it is considered the proposal meets Exception 3 of SE's published Playing Field Policy and Guidance (2018) document and is therefore acceptable in principle.

Conclusions - Economic Benefits

- 10.44. An Economic Benefits Statement has been submitted with the application which outlines the following benefits directly resultant from the proposed development:
- **Construction benefits:** The £117m investment in construction activity will support 125 net additional temporary construction jobs in Waltham Forest over the development period, generating £40.7 million in net present value GVA.
 - **Operational Impacts:** While the Civic Building has been designed to host existing staff, net additional operational impacts of the creche, café and the other commercial space on campus will create 48 jobs and generate £1.09m GVA per annum, resulting in a cumulative GVA of £19.2m over the next thirty years.
 - **Wider Economic Effects:** At full occupation, residential accommodation is estimated to generate £5.7m in net additional spend annually i.e., some £139m in net additional spend over the next thirty years. It is estimated that this additional local spend will create a further 41 retail and hospitality jobs, generating £1.0 million in GVA per annum (£15.7m in NPV GVA over thirty years).
 - **Regeneration of Walthamstow:** The project will catalyse the regeneration of the Forest Road Corridor as outlined in the Draft Local Plan Document, while also generating local momentum for the separate works at the Town Hall, Assembly

Hall and Fountain, which, through consolidation of campus buildings will provide opportunities for new uses and occupiers.

- Developing Community Assets: Public realm improvements across the Campus and particularly in Chestnuts Field will deliver key improvements to the area's community infrastructure and open space.
- Thus, given the considerable public benefits of the scheme, including the long-term retention of the civic function at this site, the housing (including affordable housing) provided, and the enhancements to the setting of the listed assets achieve through the development, and the considerable economic benefits the proposal would bring to the area, the less than substantial harm created by the extended form of Block B can be considered to be outweighed.
- The proposals are compliant with Sections 16, 66 and 72(1) of the Planning (Listed Buildings and Conservation Areas Act) 1990. In accordance with paragraphs 196 - 196 of the NPPF where some less than substantial harm has been identified, the proposed works offer public benefits which should be considered in the decision process under the linked planning reference 211393.

- 10.45. Officers consider that the demolition of the Magistrates building, and associated buildings is justified in order to re-purpose and meet the current and future needs for the site by providing flexible workspace, publicly accessible facilities and sustainability. The new compact and energy efficient BREEAM 'Very Good' Civic building is designed to be flexible over the long-term which would positively contribute to the placemaking of the wider site.
- 10.46. The site as a whole currently represents an inefficient use of land that is heavily car-based in an out of centre location within the borough. There is a significant opportunity to provide a distinct and high-quality development underpinned by robust placemaking objectives which optimises the potential of the site and delivers a new, well-designed and sustainable neighbourhood within this part of the borough. The redevelopment of the site represents a significant strategic opportunity to deliver a high quality transformation of the site by providing a substantial contribution to the housing stock in the Borough and fit for purpose non-residential office and flexible floorspace as a continuation of the Phase 1 works. The site is strategically located within the Forest Road Corridor and is considered to be highly suitable for placemaking and delivering a high quantum of new homes that would make better and more effective use of the land with a significant reduction in parking provision which are key tenets of local and national policy. The application would provide flexible non-residential floorspace within a high quality public realm and expansive areas of formal and informal open space.
- 10.47. As such, the scheme is considered acceptable in principle subject to other considerations discussed later in the report, as it would contribute significantly in delivering the objectives under the Council's broader emerging policy for the Forest Road Growth Corridor with the provision of strategically important housing delivery, offices, community facilities, improved connections and placemaking in accordance with London Plan Policies G4, H1, H11, B2 b), H4 and SD1 and SD6, Policies CS1, CS2, CS3, CS8 and CS10 of the Waltham Forest Local Plan Core Strategy (2012) and Policies DM1, DM2, DM17 DM20 and DM26 of the Waltham Forest Local Plan Development Management Policies (2013).

B. MARKET AND AFFORDABLE HOUSING AND VIABILITY

- 10.48. Policy D4 of the London Plan (2021) set a strategic target of 50% of all new homes deliver across London to be genuinely affordable. Central to this is encouraging a range of tenures, including different types of affordable housing and providing for groups with distinct housing requirements. The Mayor's Housing SPG (2016) provides guidance on the overall approach to estimating needs of different sorts; on the role of planning in facilitating private rented housing; and addressing the requirements of distinct groups.
- 10.49. Policy H10 of the London Plan (2021) encourages a choice of housing based on local needs with regard given to robust local evidence of need, the requirement to deliver mixed and inclusive neighbourhoods and the need to deliver a range of unit types at different price points across London.
- 10.50. Policy H6(A) of the London Plan (2021) sets out the split of affordable products that should be applied to residential development:
1. *a minimum of 30 per cent low cost rented homes, as either London Affordable Rent or Social Rent, allocated according to need and for Londoners on low incomes*
 2. *a minimum of 30 per cent intermediate products which meet the definition of genuinely affordable housing, including London Living Rent and London Shared ownership*
 3. *the remaining 40 per cent to be determined by the borough as low cost rented homes or intermediate products (defined in Part A1 and Part A2) based on identified need.*
- 10.51. Policy H6(B) of the London Plan (2021) states that to follow the Fast Track Route the tenure of 35 per cent of homes must meet the requirements set out in Part A. The Fast Track Route is also available to applicants that elect to provide low-cost rented homes in place of intermediate homes, provided the relevant threshold level is reached. Where affordable homes are provided above 35 per cent, their tenure is flexible, provided the homes are genuinely affordable (defined in Part A1 and Part A2), and should take into account the need to maximise affordable housing provision, along with any preference of applicants to propose a particular tenure.
- 10.52. Policy CS2 of the Waltham Forest Local Plan (2012) seeks to maximise the number of quality affordable homes in the borough by aiming to provide at least 50% affordable housing over the Plan period. Further, Policy CS2 provides flexibility in assessing the level of affordable housing on a site-by-site basis to achieve the maximum available. In addition, as the land is publicly owned, the maximum reasonable level of affordable housing should be considered on-site.
- 10.53. Policy DM3 of the Waltham Forest Local Plan Development Management Policies (2013) states that the Council aims to provide 50% of new housing to be affordable and seek a tenure split of 60% social/ affordable rented and 40% intermediate housing units.

Fast Track Approach

- 10.54. The London Plan (2021) Policy H4 requires major development to provide affordable housing through the threshold approach. Policy H5 sets out the 'threshold approach' whereby schemes meeting or exceeding a specific threshold of affordable housing by habitable room without public subsidy and which meets other criteria are not required to submit a viability information to the GLA, nor would the application be subject to a late review mechanism. In the case of this publicly owned site, the threshold is 50%.

- 10.55. The application seeks to provide 50% affordable housing by habitable room and 47% by unit. The tenure split by habitable room is 47% at London Affordable Rent (LAR) and 53% at intermediate (Shared Ownership). Following discussions with the Council's Housing Officer, whilst the tenure split does not quite deliver the 60:40 tenure split in favour of social rent, the scheme delivers 50% affordable housing and is eligible for the Fast Track Route as confirmed by the GLA in their stage 1 report. The rented element would be at low-cost rent levels in line with London Affordable Rent (LAR) benchmark levels which is '*genuinely affordable*' and the delivery of 50% affordable housing weighs heavily in the planning balance as it is a substantial public benefit. The detailed affordable housing offer is set out in the table below:

Detailed Affordable Housing Offer:

	London Affordable Rent	Shared Ownership	Private Sale	Total	Percentage
Studio	0	5	25	30	6.9%
1 bedroom	24	50	60	134	30.9%
2 bedroom	36	46	116	198	45.7%
3 bedroom	25	17	27	69	15.9%
4 bedroom	2	0	0	2	0.5%
Total (units)	87	118	228	433	
Percentage (units)	20.0%	27.3%	52.7%	100%	
Total (habitable rooms)	293	328	622	1,243	
	621				
Percentage (habitable rooms)	23.6%	26.4%	50%	100%	
	50%				

- 10.56. The affordable housing offer at 50% by habitable room with a 53:47 tenure split and 43:57 tenure split by unit in favour of intermediate is based on 205 affordable units. The rented element would be at LAR benchmark levels and shared ownership products secured as affordable to a range of incomes below the upper limit of £90,000 per annum, per household. This would be secured by s.106 legal agreement in perpetuity. Whilst regard to Waltham Forest Strategic Housing Market Assessment (2012) underpins and provides the evidence base for seeking certain tenure split, there has always been a drive to give more affordable homeownership opportunities for residents and this mix in favour of intermediate housing responds to this. As set out in para. 4.10 of the adopted Local Plan, the Council prefers the intermediate product to be shared ownership housing which is affordable to households with median annual incomes and below and encourages the shift from social rented housing and for people to settle in the borough.
- 10.57. It is important to note that in para. 2.35 of the GLA Affordable Housing SPG it states that... "*Where 50 per cent affordable housing is delivered on public land, the tenure of additional affordable homes above the 35 per cent is flexible and should take in to account the need to maximise affordable housing provision*". The development provides the minimum 30% element of low-cost rent set out in London Plan Policy H6, noting that part B allows flexibility in the tenure of units provided above 35% affordable housing by habitable room. This means that it is not a requirement that a 60:40 split should be provided on the 50% affordable housing and therefore greater flexibility can be afforded. This is corroborated by the GLA in their stage 1 report. As such, the affordable housing offer and tenure split is accepted and would not require a late stage viability review

owing to the scheme being eligible for the Fast Track Route. This is subject to Stage 2 GLA referral.

- 10.58. All the new homes have been designed to be 'tenure-blind' and each would feature the same high-quality elevational treatments, entrances and common areas. Each resident will have access to all the landscaped open spaces and play areas across the development; there is no communal amenity space in the development that is restricted to a specific tenure, building or apartment. The affordable rented unit sizes would be consistent with the intermediate and private market sale units. All the communal private amenity areas and play spaces would be available for all residents to use irrespective of tenure.
- 10.59. All external amenity space would be maintained to the same standard by the same maintenance contract and would adhere to a Landscape Management Plan to be secured by condition subject to planning approval.
- 10.60. Pepper-potting has been raised during recent engagement with local Councillors on previous schemes. The term 'pepper-potting' is a form of mixed tenure development whereby affordable homes including social rent are sprinkled amongst privately owned housing. The proposed mix of tenure would be in blocks B, C D and H avoiding any solely affordable blocks.
- 10.61. There are policies at local and regional levels seeking to deliver inclusive communities and tenure blind developments. However, there are no national, regional or local policies specifically requiring pepper potting. Indeed, the Mayor's draft Good Quality Homes for All Londoners guidance acknowledges that in some higher density schemes separate provision of entrance and circulation spaces for different tenures may enable affordable housing provision which might otherwise be made unviable given high service charges and management arrangements. The guidance also expects affordable homes to have the same external appearance, where separate entrances are included for these to be of equal quality in terms of size and legibility and equal access to communal amenity and play space.
- 10.62. Consistent with the Mayor's draft Guidance observations have been made that Registered Providers (RPs) tend to prefer to have discrete blocks or cores in flatted developments so they can control management and maintenance of the affordable housing. RPs have to meet regulatory standards, and this can be difficult to achieve if the block is managed by a third party, in terms of both the quality and cost of the services. High cost poor quality management could adversely affect the RP's regulatory rating. Service charges impact affordability.
- 10.63. Taking into account the London Strategic Housing Market Assessment and the Mayor's Affordable Housing and Viability SPG (2017), there is a general recognition that affordable housing has been historically under-delivered and that currently affordable housing makes up 65% of London's current housing need. Subject to a Section 106 Agreement that ensures the delivery of significant affordable housing and given the context of the borough's London Plan housing targets, the scheme is considered to be acceptable regarding the maximum and reasonable provision of affordable housing this proposal could provide that would make a significant contribution to affordable housing delivery in the borough.
- 10.64. As such, it is considered that affordable offer represents a significant public benefit and accords with the Mayor's Affordable Housing and Viability SPG (2017) and the Waltham Forest Local Plan Affordable Housing and Viability SPD (2018) and Policy DM3 of the

Waltham Forest Local Plan Development Management Policies (2013 and Policies H4, H5 and H6 of the London Plan (2021).

C. HOUSING MIX

- 10.65. The NPPF (2021) states that, '*sustainable development involves seeking positive improvements in the quality of the built environment, including widening the choice of high quality homes*'. The NPPF (2021) recognises that in order to create sustainable, inclusive and diverse communities, a mix of housing types, which is based on demographic trends, market trends and the needs of different groups, should be provided.
- 10.66. Policy CS2 of the Waltham Forest Local Plan Core Strategy (2012) requires mixed and balanced communities and sets out the Council's priority for larger homes (3 bedrooms or more) in new developments. Policy DM5 of the Waltham Forest Local Plan Development Management Policies (2013) sets out the Council's preferred housing mix for mainstream market housing schemes which states that '*there should be a varied mix of units across the development*'. Policy DM5 reiterates Policy CS2 and sets out the Council's preferred housing mix with the preferred percentage being as follows: 20% one bed units, 30% two-bed units, 40% three-bed units, and 10% four-bed units.
- 10.67. WFLP DM Policy DM5 sets out the Council's preferred mix as follows:

	1 bed	2 bed	3 bed	4 bed
Market	20%	30%	40%	10%
Intermediate	20%	40%	30%	10%
Low Cost Rent	20%	30%	40%	10%

- 10.68. The proposal including 433 residential units (228 market housing and 205 London Affordable Rent and Intermediate housing) would provide the following combined residential mix:
- 30 studios (7%)
 - 134 one-bedroom units (31%)
 - 198 two-bedroom units (45%)
 - 69 three-bedroom units (16%)
 - 2 four- bedroom units (1%)

Housing Mix

		Affordable Housing ⁽¹⁾ (50% of Dwellings)					
		Affordable Rent			Intermediate		
Dwelling size	Total units	Proposed	Policy compliant (30% of total units)	Surplus/ (Shortfall)	Proposed	Policy compliant (20% of total units)	Surplus/ (Shortfall)
Studio	30	0	0	0	5	0 ⁽²⁾	0
1-bed	134	24	49	(25)	50	33	22
2-bed	198	36	59	(23)	46	40	6
3-bed	69	25	21	4	17	14	3
4-bed	2	2	1	1	0	0	0
TOTAL	433	87	130	(43)	118	87	31

Dwelling Size (Policy/Proposed)	1 Bedroom / 2 person	2 Bedroom / 4 person	3 Bedroom / 5/6 person	4 Bedroom + / 7+ person
Affordable Rent	20%	30%	40%	10%
Proposed:	28%	41%	29%	2%
Intermediate	20%	40%	30%	10%
Proposed:	47%	39%	14%	0%
Open Market	20%	30%	40%	10%
Proposed:	37%	51%	12%	0%

- 10.69. Whilst the proposed housing mix would not be policy compliant with the preferred housing mix as shown in the table above with a few notable surpluses and shortfalls, officers consider a level of flexibility in which a higher proportion of one and two bedroom units would be acceptable on this occasion. This is based on that a higher provision of small units can increase levels of affordability. Although the percentage of family-sized units is lower than the adopted policy, the Mayor's Housing SPG (2016) encourages flexibility in terms of housing mix on higher density and accessible locations. Given that the proposed units would meet the minimum internal space standards and would have access to acceptable levels of internal and external amenity spaces, the provision of an increased number of smaller units would be acceptable in this instance. Bearing in mind the 50% provision of affordable housing the scheme the number of family sized affordable units is welcomed. The provision of smaller affordable units also presents the opportunity for existing tenants of larger homes to downsize into high quality new provision.
- 10.70. The proposals are subject to a 'Development Agreement' with the Council whereby an assessment of the local characteristics of the site, affordability levels, market trends, demographics, and the desire to optimise the development potential to deliver significant public benefits without required a viability appraisal, has been agreed.
- 10.71. As such, the proposed mix provides a range of unit types and sizes across the development that is considered appropriate for the site. The variety of units proposed would assist in creating a mixed and balanced community whilst meeting identified local needs in accordance with the objectives of Policy CS2 of the Waltham Forest Local Plan Core Strategy (2012) and Policy DM5 of the Waltham Forest Local Plan Development Management Policies (2013) and London Plan (2021) Policy H12.

D. DENSITY OF DEVELOPMENT

- 10.72. Whilst the NPPF (2021) does not set out any prescriptive guidance with regards to residential density, it encourages new proposals for residential development, which optimises the capacity of sites in a manner that is compatible with the use, intensity, scale, and character, the surrounding area and the size of the site.
- 10.73. Policy GG2 of the London Plan (2021) sets out that to make best use of the land, development must enable to development of brownfield land, particularly in Opportunity Areas and on surplus public sector land. It goes on to state that development must proactively explore the potential to intensify the use of land, to support additional homes and workspaces and promoting higher density development, particularly in locations that are well connected by public transport, walking and cycling.
- 10.74. Policy CS2, states the Council will seek to make the most efficient and effective use of land in the centre. This means seeking to optimise housing densities in accordance with the London Plan SPG. Given the centres excellent transport links, Walthamstow is a location where higher housing densities are considered to be acceptable. Housing

densities should be appropriate to the character and context of the Walthamstow area and should protect the amenity of occupiers and surrounding properties. As a general rule, higher density development should be focused around the Walthamstow Central transport hub.

- 10.75. In addition to the above policy considerations, Policy D3 of the London Plan (2021) encourages the optimisation of site capacity through the design-led approach and sets policy guidance to shape the form and layout, experience, quality, and character of the new development.
- 10.76. The key considerations when determining appropriate densities are the PTAL levels of the site, planned improvements in the provision of services and infrastructure, and the quality of the design in terms of the size of rooms, storage space, and amenity spaces. The minimum requirements set out in Policy DM7 of the Waltham Forest Local Plan Development Management Policies (2013) should be met, which requires proposals to meet the minimum internal space standards and external amenity space standards.
- 10.77. The site is situated in an urban location and benefits from a moderate Transport Accessibility Level (PTAL) of 2-3. The site is located within the Forest Road Growth Corridor and is within close proximity to public transport facilities. The proposed development would result in a residential density of approximately 174hrh based on a site area of 7.15ha and 1243 habitable rooms. The density of the site has been calculated in line with the Mayor's Housing SPG (2016) guidance on calculating the density of mixed-use developments. The proposed density is summarised in the table below:

Type	Density	Total
Number of units per hectare	60.4u/ha	433
Number of habitable rooms per hectare	173.6hr/ha	1243
Number of bedrooms per hectare	108.25b/ha	775
Number of bedspace per hectare	189.5bs/ha	1357

- 10.78. The proposed development is assessed in terms of the adopted and emerging policy site context given it is located within the Forest Road Growth Corridor - key growth area - where density is aligned with the strategic aim to transform and intensify land in order encourage more effective use of the land in the borough.
- 10.79. Given that the proposed development is considered of a high-quality design and would provide a good standard of living accommodation set within extensive areas of open space, the development would not present concerns in terms of being perceived as overdevelopment or a contrived form of development. There could be a case that given a site area of some 7 hectares, the proposed development is somewhat under developing the site. However, development needs to be carefully managed given the significant heritage assets and the importance of safeguarding the significance and preservation of the listed buildings, so scaling down the density of development is considered appropriate in these circumstances and locations.
- 10.80. In view of the above, the proposed development is considered to successfully respond to its urban heritage context and deliver a density to plot ratio that optimises housing potential on this site within the growth corridor and public transport accessibility. The proposal is therefore considered acceptable and consistent with the aims of delivering transformational regeneration, subject to all other planning considerations being met, particularly in terms of design and quality of residential accommodation, which is reviewed later in this report.

- 10.81. As such, it is considered that the proposal complies with Standard 24 of the Mayor's Housing SPG (2016), which in turn reflects the Technical Housing Standards – Nationally Described Space Standard and the requirements of Policy DM7 of the Waltham Forest Local Plan Development Management Policies (2013).

E. STANDARD OF RESIDENTIAL ACCOMMODATION

Internal Space Standards

- 10.82. The 'Technical Housing Standards – nationally described space standard' (2015) stipulate the minimum gross internal floor space required for residential units on the basis of the level of occupancy that could be reasonably expected for the proposed units. The policy seeks for high quality internal and external design, which should consider the sense of 'arrival' at the building and the 'home as a place of retreat', with acceptable size of rooms and functional room layouts, that meet the minimum spatial requirements.
- 10.83. Policy D6 of the London Plan (2021) sets out the housing quality and standard design specifications for new developments. Including internal rooms sizes, dual aspect, built in storage.
- 10.84. Policy CS2 of the WFLP Core Strategy (2012) requires high quality design for new housing development that has the ability to adapt to changing needs of residents and therefore aims to create healthy and sustainable communities with appropriate spatial standards and adequate levels of residential amenity.
- 10.85. Policy DM7 of the Waltham Forest Local Plan Development Management Policies (2013) requires all new residential development to meet minimum internal and external amenity spaces outlined in Tables 8.1, 8.2 and 8.3 within the Plan and the GLA's Housing SPG (2016).
- 10.86. All of the proposed residential units would either meet or exceed the minimum space standards contained within the 'Technical Housing Standards - nationally described space standard' (2015).

Dual Aspect/units

- 10.87. Policy D6 of the London Plan (2021) seeks to maximise dual aspect units and advises that dual aspect dwellings with opening windows on at least two sides have better daylight, a greater chance of direct sunlight, natural cross-ventilation, a greater capacity to address overheating, pollution mitigation, improved aspect, and outlook, greater flexibility in the choice of rooms and greater chance of accessing quiet rooms. Single aspect units that are north facing should generally be avoided.
- 10.88. 56% of the units will be single aspect, of which only 3% (11 units) of the units will be single aspect and north facing. These would look out on to Chestnut Fields. Each block maintains adequate separation gaps to each other to ensure privacy for residential units facing inwards. The single aspect north facing units would overlook Chestnut Fields and the benefit of these vistas outweighs the harm of being north facing. The total of number of dual aspect units is 44%. This is largely a function of the form of the proposed development, being low rise rectangular blocks with internal courtyards, designed to respect the adjoining heritage assets. The GLA stage 1 report confirms that the scheme would provide a good proportion of dual aspect overall.

- 10.89. Several ground floor units in block B would have individual front doors, private gardens and front terraces to promote activity, a sense of community, and direct access to green/play spaces. Maisonettes have been proposed to ensure as many residents as possible have a front door that is individual to them. These simple but effective features offer interest at ground floor level, and depth and character when seen from afar.
- 10.90. As such, it is considered that the quality of the environment of future homes is accepted as there are a substantial number of one bedroom and two bedroom units that make the most efficient use of the block layouts. There are no single aspect north-facing units, which is welcomed, and all two-bed and three-bed unit are dual aspect.
- 10.10. All blocks would not exceed eight units per core and is therefore considered acceptable in accordance with the London Plan's Housing SPG (2016).

Accessible Units

- 10.91. Policy D5 of the London Plan (2021) states that 10% of new housing must meet Building Regulation requirement Part M4 (3) 'wheelchair user dwellings', i.e., is designed to be wheelchair accessible, or easily adaptable for residents who are wheelchair users. Policy D5 of the London Plan (201) requires an inclusive design statement to be submitted as part of the Design and Access Statement.
- 10.92. Policy CS2 of the Waltham Forest Local Plan Core Strategy (2012) requires high quality design from new housing development. Policy CS2 further states that new homes should be accessible to all members of the community and be able to adapt to the changing needs of residents throughout their lives. Policy CS13 of the Waltham Forest Local Plan Core Strategy (2012) sets out that the Council aims to create and develop healthy and sustainable places and communities. New developments are required to meet appropriate standards that ensuring satisfactory amenity is provided for future occupiers.
- 10.93. The proposed development would result in 385 units (89%), which would be designed to Building Regulations requirement M4(2), and 48 units (11%), which would be designed to Building Regulations requirement M4(3). The tables below set out the mix of the wheelchair accessible/adaptable units:

Beds	Cat 2	Cat 3	Totals
Studio	30	0	30
1B	127	7	134
2B	161	37	198
3B	65	4	69
4B	2	0	2
Totals	385	48	433

	1 Bed 2 Person	2 Bed 3 Person	2 Bed 4 Person	3 Bed 4 Person	3 Bed 5 Person	
Market	0	3	3	0	0	
Affordable	7	10	21	1	3	
Total	7	13	24	1	3	48

- 10.94. In line with National Planning Practice Guidance, the affordable rented units should be delivered as wheelchair accessible and the shared ownership and market units should

be delivered as wheelchair adaptable. The specific housing mix of the proposed wheelchair accessible units will be secured by condition subject to planning approval.

- 10.95. The remaining 90% of flats have been designed to be accessible, adaptable and fully meet Building Regulations Part M4(2). The proposed wheelchair units would have a tenure split of 12% (6 units) for sale market, 48% (23units) intermediate and 40% (19units) London Affordable Rent; the specification of the wheelchair units will be controlled by condition subject to planning approval.
- 10.96. The applicant has confirmed their commitment that these wheelchair units would be exclusively marketed to those in need of wheelchair accessible housing for a period of 12 months from the launch of the units which is expected approximately three months prior to practical completion. A Wheelchair Accessible Dwelling Marketing Strategy is recommended as an obligation to any S106 Agreement to help secure the marketing strategy of these units.
- 10.97. The proposed wheelchair units would be specifically designed for wheelchair accessibility being located in close proximity to the lift core for ease of access and distributed throughout the development to provide a range of aspects, floor level locations, views, and unit sizes. Amenities would be wheelchair accessible and include disabled WCs and entrances and circulation areas will be fully compliant with the relevant sections of Approved Document M. These details will be secured by condition subject to planning approval.
- 10.98. The proposed layouts of the wheelchair units have been independently assessed by the Centre for Accessible Environments (CAE) and have been confirmed as acceptable by CAE subject to detailed assessment of the units secured by condition subject to planning approval.
- 10.99. As such, it is considered that the proposed development would provide acceptable levels of wheelchairs units within the development in accordance with Policies CS2 and CS13 of the Waltham Forest Local Plan Core Strategy (2012) and Policy DM7 of the Waltham Forest Local Plan Development Management Policies (2013).

F. RESIDENTIAL AMENITY

- 10.100. Standard 26 of the GLA's Housing SPG (2016) requires a minimum of 5sqm of private outdoor space for 1-2 person units and an extra 1sqm for each additional occupant. Standard 27 requires the minimum depth and width for all balconies and other private external spaces to be 1.5m.
- 10.101. Policy DM7 of the Waltham Forest Local Plan Development Management Policies (2013) requires proposals to meet the minimum external space standards set in the document. For flatted developments, the document states a requirement for a minimum of 10sqm of amenity space per bedroom. It states that each flat should provide an element of private amenity space, however, the overall provision can be provided in the form of both private amenity space and communal amenity space.
- 10.102. In terms of children's play space, most relevant is London Plan (2021) Policy S4 which seeks to ensure that development proposals include suitable provision for play and recreation and incorporate good-quality accessible play provision for all ages, of at least 10sqm per child.
- 10.103. Based on the proposed housing mix, the scheme would provide 775 bedrooms including the studios. Therefore, the proposed development is required to provide

7,750sqm of amenity space to accord with Policy DM7 of the Waltham Forest Local Plan Development Management Policies (2013).

- 10.104. A significant quantum of residential amenity space is to be provided across the proposed development in the form of external private amenity space in the form of recessed and projecting balconies and external communal space. The scheme would also deliver play space both at podium level and between the blocks of the development. The following table sets out the provision:

Amenity Space

	Provision (sqm)
Private External Amenity Space (balconies, private terraces & gardens)	2,923
Private Internalised Amenity Space (additional living space)	938
<i>Subtotal (all private amenity space)</i>	<i>3,861</i>
Communal Private Amenity (Courtyards and shared gardens)	2,853
<i>Sub-total (all private & communal amenity space)</i>	<i>6,714</i>
Civic Communal Space (public realm, gardens, Chestnuts Fields)	53,146
TOTAL	59,860

- 10.105. All units would comply with the following minimum private amenity space as set out in Standard 26 of the GLA's Housing SPG (2016):

- 1B1/2P - minimum 5sqm
- 2B3P - minimum 6sqm
- 2B4P - minimum 7sqm
- 3B5P - minimum 8sqm

- 10.106. WFLP Development Management Policies (2013) Policy DM7 states that 10sqm of amenity space should be provided per bedroom and balconies should be a minimum size of 5sqm. This is represented in the table below:

AMENITY SPACE REQUIREMENT CALCULATION			
No. Bedrooms	Amenity Requirement (sqm)	No. Units	Total Amenity Space Requirement (sqm)
0	0	30	0
1	10	134	1,340
2	20	198	3,960
3	30	69	2,070
4	40	2	80
TOTAL		433	7,450

- 10.107. As such, there is an overall requirement to deliver 7,750sqm of amenity space. The proposal would deliver 6,714sqm of external amenity space, of which 2,823sqm would be via private balconies and terraces, 861sqm of private communal amenity space, and 53,146sqm of publicly accessible open space including Chestnuts Field. Whilst the scheme does not provide a quantum of private amenity per dwelling in accordance with London Plan Housing SPG (2016) when considering the wider publicly accessible provision this shortfall is more than compensated. Policy DM7 allows overall provision

for both private amenity and communal amenity space so on this basis the overall provision is considered acceptable.

10.108. The quantum of communal amenity space across the proposed development is well-considered and is acceptable in accordance with WFLP DM (2013) Policy DM7. Details of landscaping are considered in further detail later in this section.

10.109. Turning to playspace provision, some 4,429sqm of informal and formal playspace would be provided throughout the scheme for the different age groups between 0-15 years not including 53,146sqm of civic communal space. In total, the proposed development would provide 6,714sqm of both communal and private amenity spaces. This would be inclusive of 4,429sqm of play space as set out below:

	Benchmark Value (GLA 10 sq.m. per child)	Scheme Provision sq.m.
Doorstep Play (0-5 years)	930	2414m2 area of formal and informal play within courtyards and residential garden.
Local Play (5-11 years)	662	861m2 dedicated play area to south of Chestnuts Field (within 400m of residential entrances).
Youth Play (12+ years)	356	Extensive play opportunities across the site. In particular southern edge of Chestnuts Field 1154m2.
TOTAL	1,948	4,429

10.110. The GLA population yield calculator estimates a total of 195 children would be expected within the proposed development which requires 1,947sqm of playspace provision. The submitted planning statement sets out the play strategy for the site with public realm, private communal gardens, courtyards for each block which equates to a twofold provision, which is strongly welcomed.

10.111. Taking the above into account (both the communal and private amenity space) within this urban, out of town centre location, the scheme would provide a high quality public realm and amenity space provision. While there is a shortfall in private/communal amenity space provision, the impact of this is offset by good access to suitable and high quality amenities and open space which would help promote healthy and sustainable lifestyles. Within the public realm of the proposed development, there would be several dedicated open spaces and gardens with an equipped area of play and high quality landscaping for future residents and the community to enjoy.

10.112. As described in the GLA Stage 1 report, the focus of the play provision is to allow accessible and safe 'doorstep' play for the 0-4 and 5-11 age ranges. Combined, these total 4,429sqm of dedicated play space to be provided. Many of the 0-4 years play would be across the podium gardens and the remaining 2,414sqm would be spread within courtyards and residential gardens. For 5-11, there would be 861sqm spread within the area, south of Chestnuts Field, and 12+ extensive play opportunities across the site particularly in Chestnuts Field. This would provide a range of play opportunities within private and public open space settings.

10.113. As such, overall, it is considered that the provision of private and communal amenity and informal and formal playspace strategy is appropriate in this location in accordance

with Policy DM7 of the Waltham Forest Local Plan Development Management Policies (2013), Policy S4 of the London Plan (2021), Mayor's Play and Informal Recreation SPG (2012) and the London Plan Housing SPG (2016),

G. AMENITY

- 10.114. Policy DM32 of the WFLP DM Policies (2013) states that when considering the impact of a new development on residential amenity the Council will have regards to impacts on daylight and sunlight, outlook and privacy of surrounding properties.
- 10.115. In terms of neighbouring properties, the development would neighbour residential dwellings along Farnan Ave along its western boundary, where the new Blocks H and J would be located. To the northern boundary, Block H would be located adjacent allotments, whilst Blocks B and C would face onto Chestnuts Field. To the eastern boundary, proposed Blocks C and D would be neighbouring by the Waltham Forest College buildings.
- 10.116. The eastern/north eastern boundary of the site thus presents the most sensitive receptors to the proposed development in the form of the residential neighbours and to a lesser degree, the allotment spaces.
- 10.117. Block H is located closest to the properties on Farnan Ave and is positioned west of the residential gardens. It would be located between circa 10m–14m distance from the rear boundaries of these properties and circa between 32m–38m away from any facing windows/walls above ground level.

Daylight, Sunlight and Overshadowing

- 10.118. The potential impacts on neighbouring amenities should be considered in the context of Paragraph 123 of the NPPF (2021). This paragraph states that where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities and ensure that developments make optimal use of the potential of each site. In these circumstances Local Planning Authorities should refuse applications that they consider fail to make efficient use of land, taking into account the policies in this Framework. In this context, when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards).
- 10.119. Policy D4 of the London Plan (2021) sets out that the design of the development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing and maximising the usability of outside amenity space.
- 10.120. The Mayor's Housing SPG (2016) paragraph 1.3.45 states *"An appropriate degree of flexibility needs to be applied when using the BRE guidelines to assess daylight and sunlight impacts of new developments on surrounding properties as well as within new developments themselves. Guidelines should be applied sensitively to higher density development, especially in opportunity areas, town centres, large sites and accessible locations... This should take into account local circumstances; the need to optimise housing capacity; and scope for the character and form of an area to change over time."*
- 10.121. Policy DM33 of the Waltham Forest Local Plan Development Management Policies (2013) states that *'when considering the impact of a new development on neighbouring*

amenity, the Council will have regards to (among other aspects) access to daylight and sunlight and will only find development acceptable where it would not cause an unacceptable loss of amenity to adjoining or future occupiers of the development’.

10.122. The application is accompanied by a Daylight and Sunlight report prepared by Waterslade. An independent assessment has been carried out by GL Hearn and their conclusions are as follows, in summary:

- *The development achieves an overall pass rate of 88%.*
- *1215 rooms were assessed using the Average Daylight Factor. 1064 rooms meet the levels detailed in the BRE. It is noted that the majority of deviations to the daylight occur to Bedrooms. Although not ideal, it is more acceptable for Bedrooms to receive lower levels of daylight as they are generally used for sleeping and storage.*
- *It is noted that there are some transgressions to the Living Rooms Kitchen, the cause of the deviations from the BRE target would appear to be the overhanging balconies. In situations where overhanging balconies, are located above Kitchens and Living Rooms daylight levels within the room will always be reduced. It is generally considered acceptable to allow for minor transgressions where private amenity is offered.*

Internal Daylight Assessment – future occupiers

10.123. The habitable rooms in the proposed dwellings have been assessed using the Average Daylight Factor (ADF) metric. The application is supported by an Internal Daylight and Sunlight report prepared by Waterslade. An independent assessment has been carried out by GL Hearn and their conclusions are as follows:

	No. Habitable Rooms Assessed	Rooms Achieving BRE ADF Target	
		No.	%
Block B	375	316	84%
Block C	430	388	90%
Block D	64	62	97%
Block H	282	238	84%
Block J	64	60	94%
Total	1215	1064	88%

10.124. Generally, 88% of habitable rooms meet BRE, ADF compliance. As shown in the above table, all blocks perform no less than an 84% pass rate. This is a very good result in urban environments and deviations are considered to be acceptable in line with similar developments. Whilst there are some non-compliant results, these deviations appear to be generally minor and therefore a level of flexibility can be applied in line with the guidance of the BRE. The level of deviation is mainly those windows that are set back under balconies, yet the sun availability on those balconies will be similar to that on the façade which those with a southerly aspect would be good.

10.125. Overall, given the large scale nature of the development and comparable impacts within an urban context, the proposed development performs well with regard to internal daylight, with some deficiencies in places owing to overhanging balconies from above. As the scheme would deliver a substantial quantum of new housing with high quality private and communal amenity spaces, the proposed development performs well and therefore is considered acceptable in this regard.

Daylight Assessment – neighbouring properties

10.126. The following properties have been identified within the assessment as potentially affected by the proposed development are as follows:

- 35-45 Farnan Avenue - The daylight and sunlight impact to these properties is minimal and fully complies with the BRE guidelines.
- 29-33 Farnan Avenue - The daylight and sunlight impact to these properties is minimal and fully complies with the BRE guidelines. While the windows would experience proportional VSC reductions of up to 0.75 (25% loss), all will retain VSC values in excess of 27% which is compliant with the BRE minima. Furthermore, the impact in relation to NSL is minimal and fully compliant with the BRE guidelines. The retained sunlight levels are excellent and will remain double the suggested BRE minima.
- 27 Farnan Avenue - Similarly, the windows in this property will experience proportional VSC reductions of up to 0.75 (25% loss) but many will retain VSC values in excess of 27% which is compliant with the BRE minima for VSC. The only exception is to one first floor window which will retain a slightly lower VSC of 26.8% due to the roof overhang. Nevertheless, the retained daylight level remains very good and is only marginally below the suggested minima. In relation to sunlight, the impact would be minimal, and the retained APSH values would be excellent, at least double the suggested BRE minima. Therefore, the daylight and sunlight impact to this property is minimal and accords with the BRE guidelines.
- 2-40 Farnan Avenue - The daylight and sunlight impact to these properties is minimal and fully complies with the BRE guidelines.
- 2D Farnan Avenue - The daylight and sunlight impact to this property is minimal and fully complies with the BRE guidelines.
- 2C Farnan Avenue - The impact to this property is minimal and fully compliant with the BRE guidelines. On the front façade of this property there would be a two-pane bay window which serves the ground floor living room. The smaller secondary window which faces into the recessed porch area currently has a low VSC value of 6% due to its constrained location. While this window will experience a proportional VSC reduction of 0.77 (23% loss), the actual reduction of 1% is minimal. In relation to sunlight, the impact will be minimal, and the retained APSH values will be very good, over double the suggested BRE minima.
- 2B Farnan Avenue - The daylight and sunlight impact to this property is minimal and fully complies with the BRE guidelines.
- Waltham Forest College - An objection has been received regarding the loss of light to a number of classrooms and unspecified rooms. As a result, our independent and the applicant's consultants have investigated this impact further. In their objection, they use the BREEAM assessment related to the affected western wing elevation of the College. However, BREEAM guidance relates to the accreditation of new buildings and does not provide a methodology or acceptability for the assessment of the impact of neighbouring buildings. As such, this method is not appropriate for such purposes. The Council and their consultants have reviewed the impact of the proposed development in line with BRE guidelines. BRE guidelines are intended to be used flexibly particularly in

urban area and for the use of rooms in adjoining dwellings where daylight is required including living rooms, kitchens and bedrooms. Windows to bathrooms, toilets, store rooms, circulation areas and garages need not be analysed. The guidelines may also be applied to any existing non-domestic building where the occupants have a reasonable expectation of daylight; this would normally include, schools, hospitals, hotels and hostels, small workshops and some offices. The Council consider that whilst there is a certain expectation of daylight to Waltham Forest College, the a loss of light to a number of classrooms (and circulation areas) would be limited to the western side of the college building and nowhere else. Reference is made to 80% compliance target, but this should be taken globally not for individual rooms where floors above ground floor would not be so affected. Whilst there would be localised noticeable VSC reductions, many windows would retain VSC's of 18% or more. Isolated exceptions to windows in constrained locations and flank wall windows some of which are circulation areas and not classrooms are common in urban areas. Therefore, the retained daylight levels to the classroom windows should be regarded as acceptable and it is highly likely that classrooms will use artificial lighting to ensure light is consistent throughout the day.

- 10.127. As such, the impact on nearest neighbouring properties in terms of loss of daylight and sunlight are minimal and broadly compliant within BRE guidelines.

Overshadowing

- 10.128. With regard to overshadowing and Sun Hours on Ground (SHOG), the neighbouring sensitive receptors, residential gardens perform very well. The proposed development would result in a minor reduction of SHOG from 98% to 91% on 21st March. Overall, the surrounding gardens continue to fully comply with BRE guidance and will enjoy high levels of sunlight all year round, with overshadowing being transient and negligible in nature.
- 10.129. As per drawing ref: W1238_S_03-04 it shows that all the rear gardens along Farnan Avenue will retain good sunlight amenity, with gardens experiencing at least 2 hours of sunlight over 50% of their area on 21st March. The only exception is to one allotment plot directly to the north of Block H which would be reduced to 37.3% in the proposed situation. Whilst the loss of SHOG to the allotment is below guidelines, this relates to a single plot with a 13% loss which is not considered significant overall.
- 10.130. As part of the assessment, the sunlight amenity to the courtyard areas within the proposed blocks B, C, and H was carried out. The courtyard within block B, at a first-floor podium level, will achieve direct sunlight to 67.6% of its area on the 21st of March and is therefore compliant with the BRE guidelines. The first-floor level courtyard within block C will achieve sunlight to 100% of its area, fully compliant with the BRE guidelines.
- 10.131. The courtyard of block H is at lower ground level and will achieve sunlight to 34.3% of its area in March, and therefore does not meet compliance with the BRE guidelines. However, it will experience reasonable levels of sunlight in the summer months when it is most likely to be used. Block B also has private amenity areas to the north and west of the scheme.
- 10.132. The four areas to the west of the scheme will achieve sunlight to over 50% of their area in March, while as expected, the north facing gardens will receive less sunlight. Furthermore, all residents have access to extensive communal amenity areas within the

site that will receive very good sunlight levels throughout the year. As such, overall, all future residents would have access to good sunlight amenity throughout the year.

Conclusions

10.133. Overall, it is considered that the proposed development would broadly deliver a good level of daylight and sunlight to the proposed development especially during the summer months. Within the proposed development the overall compliance rate of 88% is not uncommon for a modern urban residential accommodation such as this and is, therefore, be considered as acceptable. The need to make the best use of development land necessitates an increase in density, which requires a flexible approach to daylight and sunlight. This is considered especially true given the BRE Guide itself advocates the flexible application of its criteria, the policy directive to make efficient use of this key brownfield site, and the flexible approach afforded by para.123 of the NPPF (2021) and the Mayor's Housing SPG (2016) in such instances to policies and guidance relating to daylight and sunlight. The proposal is therefore considered to accord with Policy DM33 of the Waltham Forest Local Plan Development Management Policies (2013).

Privacy and Overlooking

10.134. Policy 29 of the Mayoral Housing SPG (2016) states that development should maintain a distance of about 18m to 21m between habitable windows. The SPG adds how there should be adequate levels of privacy in relation to neighbouring properties, the street scene, and other public places.

10.135. Waltham Forest Urban Design SPG states that the following minimum clearance separation distances between the windows of habitable rooms and kitchens in opposing dwellings:

- 20 m between two-storey dwellings;
- 30 m between dwellings with a maximum height of three storeys; and
- 40 m between dwellings with a maximum height of four storeys;

10.136. However, the Urban Design SPG is not considered appropriate for high density schemes, therefore the Mayor's Housing SPG is appropriate in this regard.

10.137. The proposal has been carefully designed to protect the privacy and overlooking to new and existing residents. Officers have assessed the separation distances from the proposed windows to the existing properties along Spruce Hills Road, Forest Road, Farnan Avenue, and allotment gardens. This is illustrated below:

- ## Outlook

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- 10.143. For these reasons, the proposal is considered to accord with DM32 of the WFLP DM Policies (2013).

Private Amenity

- 10.144. It is proposed that all dwellings would have a policy compliant sized private amenity space in the form of recessed or projecting balcony or a terrace. This is acceptable in accordance with the London Plan Housing SPG standards.

H. DESIGN OF THE DEVELOPMENT

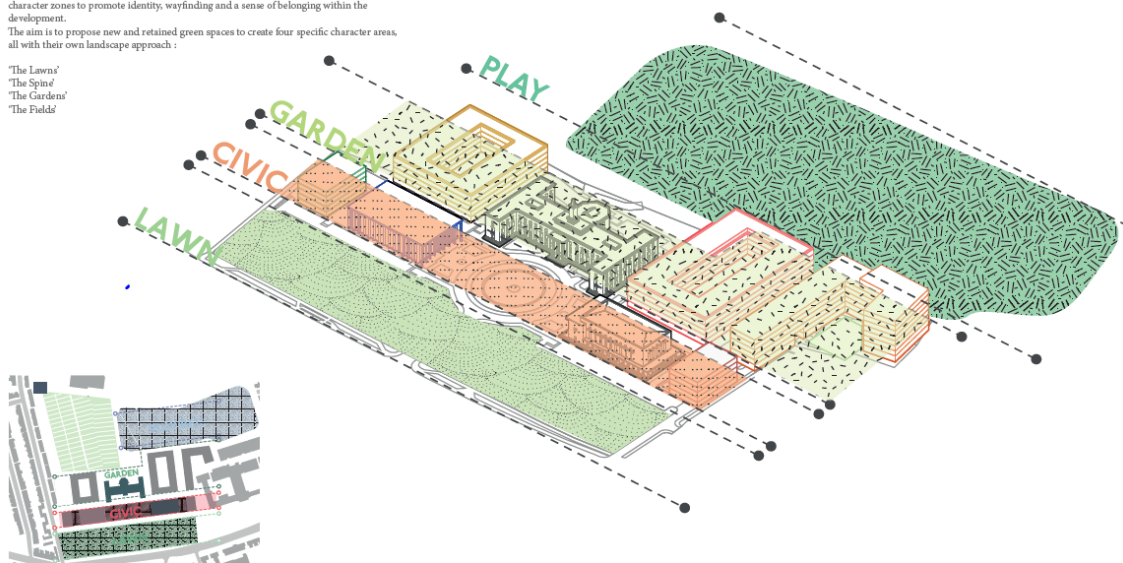
- 10.145. The NPPF (2021) states that the creation of high-quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.
- 10.146. Policies D4 and D6 of the London Plan (2021) states that development should be of a high quality of design and placemaking.
- 10.147. Policies CS2 and CS15 of the Waltham Forest Local Plan Core Strategy (2012) require development to be of a high standard and design quality that responds to the local context and the character of the surrounding area, while improving the way places function by promoting local distinctiveness and a strong sense of place.
- 10.148. Policies DM29 and DM30 of the Waltham Forest Local Plan Development Management Policies (2013) seeks for high standard of urban and architectural design principles for all new forms of development.

Building Layout and Spatial Configuration:

- 10.149. The proposed building arrangement and heritage-led development have well considered urban design principles that seek to respond to established heritage views of the site along Forest Road while creating better connectivity and visual harmony between the Waltham Forest College to the east and the residential properties on Farnan Avenue and the mix of uses on Forest Road. The understanding was based on the following series of characters called 'The Lawns, The Spine, The Gardens and The Fields as illustrated below:

We believe it is important to understand the character of the area, and the propose new character zones to promote identity, wayfinding and a sense of belonging within the development.
The aim is to propose new and retained green spaces to create four specific character areas, all with their own landscape approach :

'The Lawns'
'The Spine'
'The Gardens'
'The Fields'



- 10.150. The architecture masterplanning and layout configurations adhere to good design principles. The location of the residential buildings respects the symmetry of the existing listed buildings and provides intuitive routes through the site. There are some concerns with the span width and layout of Blocks B and C as part of the wider scheme towards the eastern boundary especially Block B as it extends some 81m in length closest to the Town Hall listed building. Officers are of the opinion that the form and massing could possibly be more human scale in terms of residential uses contained in one larger block. It is acknowledged that this part of the proposed development pushes the extents of the site boundaries towards the rear of the Town Hall and when read from Chestnuts Field would be visually more prominent compared with the other blocks. Block C is the tallest block but would be sited furthest away from the Town Hall. Whilst block C, which is next to block B, would appear visually prominent but its position would lessen the impact of the tallest block with a modest nine storey pop-up element. It would be furthest away from the sensitive setting of the listed buildings. It would, however, be nearer to Waltham Forest College, which is a locally listed building, however, on balance, it is officers opinion that the proposed development is not considered to have a negative impact upon the overall heritage character and provides a good route marker across the site.
- 10.151. The proposed development would introduce courtyards in blocks B and H, smaller bookend blocks (D and J) and the Civic Building that would collectively respect the scale and location of the Town Hall and Assembly Hall as key focal points and centrepieces of the site around which all development has been arranged. New pedestrian and cycle routes would be linked to a number of routes, which would connect residents on Forest Road and through to Chestnuts Field. The proposed layout configuration would therefore not only have a layout and built form that would be suitable for transformational development, it would enhance and create an extensive amount of public realm and open space to the benefit of its surroundings.
- 10.152. The Council's Design Officer and the Design Review Panel (DRP) advise that the spatial arrangement and layout in relation to the form and typology of residential Blocks (B, C, D, H, J) and the Civic Building is welcomed, and collectively they provide a clear distinction between private and public space that is well-considered.

- 10.153. The proposals seek to take cues from the civic nature of the historical architecture and layout of the site, retaining the principles of symmetry, buildings typology, street hierarchy and pattern, and the aspect of placemaking that is defined by the grandeur of the formal landscapes present on site.
- 10.154. The layout and sizing of residential blocks respond well to the existing composition of the town hall complex, with a legible sequence of public realm and new street frontages. The podium courtyard arrangements create clear delineation between public and private realm, as well as a high degree of active residential frontage. The proposed combination of hard urban edges and soft landscaping is considered appropriate in this setting, formed by various public open spaces would provide acceptable separation distances between each block in order to provide acceptable visual outlook on each residential unit and maximise dual-aspect dwellings. Given the widespread landscaped-led approach and the clear articulation in terms of building height and massing, the proposed building blocks would not be perceived as overdominant forms of development, by virtue of their acceptable separation distance, building alignment and façade articulation through a consistent architectural language. In this regard, the GLA in their stage 1 report, support the proposed layout.
- 10.155. As such, it is considered that the proposed typology, layout and spatial arrangements is considered acceptable as it integrates well into the existing urban environment surround the site and the wider urban context. The new pedestrian and cycle routes would not only improve the public realm but would also connect existing residential properties at the north side of the site. As such, the proposed building layout and configuration is supported and considered consistent with Policies D4 and D6 of the London Plan (2021) and Policies DM29 and DM30 of the Development Management Policies (2013).

Tall Buildings

- 10.156. The London Plan (2021) recognises that tall and large buildings can form part of a strategic approach to meeting the regeneration and economic development goals laid out in the London Plan, particularly to make optimal use of the capacity of sites with high levels of public transport accessibility. Policy D9 states that tall buildings should only be developed in locations identified as suitable in local plans and identifies a range of visual, functional, environmental and cumulative impacts that should be assessed.
- 10.157. Policy CS15 of the WFLP Core Strategy (2012) directs tall buildings (10+ storeys) to key growth areas such as Blackhorse Lane, Northern Olympic Fringe, Walthamstow Town Centre, and Wood Street.
- 10.158. Policy DM31 of the WFLP DM Policies (2013) states that tall buildings maximise the use of land and create sustainable buildings at locations well-served by public transport and local services.
- 10.159. Policy 57 of the emerging Local Plan (2020) identifies strategic locations, including Forest Road Corridor, as being suitable for tall buildings, subject to impact on character and context. Transformational developments can have typical shoulder heights ranging from 4-9 storeys to 18+ storeys for the tallest buildings. At criterion B of this policy it states that Taller and Tall buildings are unlikely to be supported outside Strategic Locations and Opportunity Sites.
- 10.160. As stated above Policy CS15 of the WFLP Core Strategy (2012) directs tall buildings to key growth areas such as Wood Street states that the following criteria are relevant for the siting of taller buildings:
- i. 'Gateway' sites or key entrance points to the borough;

- ii. “Landmark” locations at key junctions along principal routes;
- iii. Central areas or key junctions within designated centres
- iv. Sites fronting large areas of open space, subject to there being no harmful impact on openness and visual or physical amenity.

- 10.161. With reference to the LBWF Character and Intensification Study 2019, a holistic approach to redevelopment gives much greater scope for intensification and transformation of character than smaller sites with greater flexibility for the arrangement of taller elements and creation of new urban grain. This holistic approach to intensification allows a positive response to character and placemaking.
- 10.162. As aforementioned, the site falls within the Forest Road Corridor, which is of strategic importance. The Forest Road Corridor Planning Framework identifies the aspirations for this site and references the draft skyline study which recommends generally low heights but identifies potential for increased height to 6–9 storeys towards the rear of Waltham Forest College. The acceptability of taller buildings can be supported if these buildings sit comfortably within their setting as described in the supporting TVIA which is assessed in the ES at section 11 in greater detail. Taller buildings seek to deliver an optimum density and greater proportion of dual aspect dwellings at higher levels.
- 10.163. A part of the wider scheme, it would range up to nine storeys in height so is defined as a tall building based on an AOD over 26m above natural ground level basis as described in para. 18.19 of the Core Strategy. Whilst the prevailing character of the surrounding area is of a domestic scale comprising 2–3 storey terraced dwellings, and 3-4 storey post-war Council office blocks, the nine storey portion of Block C would be some 31.8m high. The proposed development would result in an increase in height, bulk and massing compared to the existing structures adjacent to Chestnuts Field as demonstrated in the image below. However, the additionality would not have a detrimental or strident visual impact on the townscape. The GLA raised some concerns in terms of suitability and harm of a taller building especially in terms of its significant heritage context; however, they do support the approach to locating the bulk of the massing towards the openness to the north, where low-rise massing has been historically established, and at a distance from the existing residential terraced dwellings on neighbouring streets.



- 10.164. Given the tallest element would be located adjacent to Chestnuts Fields and represents a nine storey ‘pop-up’ element then drops to seven storeys for the rest of Block C,

aligned with optimising the site, this is considered acceptable under these circumstances. In addition, the taller element would have limited visual and amenity impact and preserve the significance and prominence of the surrounding Listed Buildings namely the Town Hall and Assembly Hall as well as the three smaller listed structures including gates, flagpoles and a war memorial. As such, it is considered given the transformational changes that the proposed development would bring about positive design interventions and enhancement to the public realm. The design has been controlled to ensure the impact on its local and historic context. To this end, the impact visually, environmentally and functionally would be to the satisfaction of the Council in line with Policy 57 of the emerging Local Plan (2020).

- 10.165. A wind study was prepared by AECOM and it concluded that whilst the scheme broadly does not represent tall buildings, it is important to ensure pedestrian and frail/elderly comfort with regards to wind directions/velocity and the steady-state of Lawson Comfort and Distress method. The results of the study at 1.5m above ground level that most areas of the proposed development are suitable for pedestrian sitting or pedestrian standing with one extremely small area to the west of building B suitable for pedestrian walking. The wind microclimate around the existing buildings was found to be generally acceptable with all locations having wind speeds suitable for their intended uses.
- 10.166. In light of the above and taking into consideration the contextual and future appraisal which has been prepared in the submitted Townscape and Visual Impact Assessment (TVIA) as part of the ES, it is considered that there is a strong and robust justification for introducing a tall element on a site that falls within the Forest Road Corridor and is allocated for development intensification. As such, it is considered that the proposed buildings up to 9 storeys, mitigated by the typography and location of the land, would successfully respond to the character and constraints of the site and its setting and would achieve an acceptable perception from the nearby and the wider townscape. As such, the proposed height and massing of the taller elements is justified and considered consistent with Policy D9 of the London Plan (2021), Policy CS15 of the WFLP Core Strategy (2012) and Policy 57 of the emerging Local Plan (2020)..

Height and Massing:

- 10.167. Policy 8 of the of the emerging LBWF Local Plan (2020) sets out the Council's approach to character-led intensification. The draft policy sets out 3 key approaches towards identifying opportunities for intensification of development;
- A. Reinforcement: applicable to sites/areas with robust and desirable character where opportunities for redevelopment will involve a modest increase in intensification;*
 - B. Transition: applicable to sites/areas where a considerable increase in intensification would be justified in local areas including Designated Centres, Major Routes, Borough Arrival Points and Strategic Locations; and*
 - C. Transformation: applicable to sites/areas with a fragmented urban grain, where a transformative approach to intensification of existing character can be justified to deliver substantially more development.*
- 10.168. Policy 14 of the emerging LBWF Local Plan (2020) identifies Forest Road Strategic Location as a key priority area for delivering regeneration and good growth and identifies Forest Road as a Strategic Location as suitable for delivering a minimum of 1,250 new homes.
- 10.169. A landscape led approach to intensification is supported by LBWF's Characterisation and Intensification Study (2019). Forest Road has been identified as an area with fragmented urban grain within a growth area. Accordingly, the application site has been

identified in the Local Plan Part 2: Site Allocations Document as appropriate for 'Transformation' of character and is a site of strategic importance for delivery of substantial number of new homes towards meeting the boroughs housing targets.

- 10.170. The proposed development would engender the large scale transformation of the site (Phases 1 and 2) that has been identified and deliver significant public benefits mainly in the form of contributing to housing supply and fit for purpose office space and placemaking enhancements.
- 10.171. In terms of the residential led blocks B, H and J they share a common architectural approach. The design proposals retain the rigorous well-mannered facades and massing that complements the heritage context whilst introducing a series of articulations and interventions to enhance and enliven the streetscape and building frontages. An architectural language has been adopted that employs a rich but subtle materiality, a language that closely reflects buildings such as the Hilversum Town Hall that inspired the original campus architecture and one that is entirely appropriate for the site.
- 10.172. Outward street facing facades are restrained, formal and respectful of the listed buildings, whilst inner courtyard facing facades have a more expressive language of generous projecting balconies and wide inset terraces.
- 10.173. Block J consists of 5 storeys, forming the western bookend to the front elevation of the site, is composed as a villa, with primary elevations in each direction. The southern end faces on the lawns and contains commercial space at ground floor. This provides frontage on three faces and activates the public realm in each direction. The north-east corner of the ground floor contains the housing office, providing activity on one of the main pedestrian entrances to the site.
- 10.174. The residential entrance is recessed in the north elevation, providing a refuge away from the pavement, for residents entering and leaving the building.
- 10.175. Block H consists of 5 storeys, the west of two courtyard buildings, sits adjacent to the Civic Building and to the west of the Town Hall. The primary elevations face out onto the campus and toward the allotments to the north. These are characterised by decorative balconies and a distinct ground floor language which expands to a two-storey framing as the street level drops away towards the north. The courtyard provides communal amenity space for the residents. The courtyard-facing balconies feature a full-depth balconies on the east and west facades and inset balconies elsewhere. In addition to the courtyard, the landscape to the west of building contains a green space with existing trees for residents, accessed via the north-west core.
- 10.176. The principal residential entrance to the south is open to the courtyard, with an undercroft providing a visual connection between the public street and communal amenity space in the courtyard. There would be a secondary entrance, providing access for residents of the north-east core, in the façade facing the Town Hall garden.
- 10.177. Block B consists of 5 storeys, the larger of the two courtyard buildings reflects the façade approach of Block H, with more formal facades facing the wider campus and a mixture of projecting and inset balconies to the courtyard. To the north, a row of maisonettes has front doors facing onto Chestnuts Field, via front gardens. On the east elevation, the street levels drop to the north, enabling access to the podium carpark. The principal entrance from the street opposite the Assembly Hall provides level access to the communal courtyard. There are additional entrances to the two northern cores.

These provide active frontage to the public realm adjacent and convenient access for residents.

- 10.178. In terms of Block C, the largest and highest building consisting of 7-9 storeys, the design proposals seek to propose a rigorous well-mannered facade and massing that complements the heritage context and the other residential blocks around the site. The buildings look to be subservient to the existing listed buildings yet introduce an architectural style that articulates areas along the streetscape and building frontages. The development with its Civic building and residential blocks would deliver well overlooked residential streets that are safe in character with high quality defensible space and a robust easy to maintain public realm.
- 10.179. Block D consists of 5 storeys, similar to block J, and it would occupy a prominent location on the campus perimeter facing onto the formal lawns. The height of these blocks extends to five storeys to reinforce their role as 'bookends' within the wider architectural composition that frames the civic building and assembly hall to the south of the campus. Forming the eastern bookend to the front elevation of the site, Block D is composed of a villa with primary elevations in each direction. The southern end faces on the lawns and contains commercial space at ground floor. This provides frontage on three faces and activates the public realm in each direction. The building has been designed to relate to its immediate context and relationship with the Assembly Hall.
- 10.180. Turning to the new Civic building, this would be a broad 3 storey building that reflects and respects the sensitive heritage group value of the Town Hall and Assembly Hall and the Fellowship Square. This has resulted in a height and massing through sensitively designed elevations are defined by a ground floor plinth referencing the single-storey Assembly Hall plinth to reinforce the masterplan's symmetry around Fellowship Square. This plinth contains larger full-height openings, whereas there are simpler 'punched' window openings on the first and second floors akin to those in the existing Town Hall. The regular 3.6m rhythm and vertical proportions of the windows on the Town Hall and Assembly Hall are used on all sides of the New Civic Building. The height of the New Civic Building matches the parapet line of the Town Hall. The rationale and design of elevational details are described below:

East Elevation

- 10.181. The entrance portico with its refined columns set-out on a gentle curve aims to be contemporary and welcoming whilst referencing the Scandinavian modernism of the surrounding existing civic buildings. A slim and lightweight pre-cast soffit with shaped stone columns expresses the honesty and structural integrity of its modern method of construction.

South Elevation

- 10.182. The view of the New Civic Building from the southwest corner of the site is important as this would be the majority of users first view of the Campus. The datum taken from the single-storey part of the Assembly Hall is used to define the openings at ground floor. This run of full height windows and doors is gently curved in plan to welcome in visitors to the building and ground floor café.

West Elevation

- 10.183. The same rhythm of facade bays wrap around the west elevation with large windows to a cafe/restaurant to provide active frontage to the pedestrian link between buildings and the rest of the campus.

North Elevation

- 10.184. The north elevation faces residential Block H, forming part of the campus masterplan. The ground floor is largely glazed to provide active frontage to the new street in between buildings, with access to servicing elements minimised and integrated into the design. The generous stair provides interest vertically at the centre of the elevation.
- 10.185. As advised by the Council's Design officer, there is much to commend within the proposed development, notably, the broad approach to layout is well-considered, the commitment to providing a high quality public realm, the proposed material palette, and the contribution the scheme could make to the wider neighbourhood and ongoing regeneration of this part of the borough. A transformation of character allows for a redefinition of appropriate plot ratios, within the heritage context and local character.
- 10.186. As such, subject to condition, the overall massing and building articulation of the scheme is considered acceptable and appropriate for a site identified for transformation consistent with Policies DM29 and DM30 of the WFLP Development Management Policies (2013), and Policies 8 and 14 of the emerging WFLP Local Plan (2020).

Architectural quality and Materiality

- 10.187. London Plan 2021 Policies D1 and D2 seek to ensure that new developments are well-designed and fit into the local character of an area. New buildings and spaces should respond in terms of their form, style and appearance to successfully integrate into the local character of an area, with a positive relationship with the natural environment and respect and enhancement of the historic environment.
- 10.188. The broad contemporary approach to architecture is supported and the choice of materiality responds well to the context. The planning submission demonstrates that a high build quality can be achieved, and this should be secured by condition subject to planning approval.
- 10.189. The proposed material palette has evolved and is broad. As set out in section 9.2.7 of the Design and Access Statement, the material strategy for the blocks and the rationales are considered well thought out. The proposed brick type approach varies from neutral buff / white brick (and warm pink brick every three courses) and light/white brick would be robust and high quality with a light warm tone of brick for the main street facing facades and together with light grey mortar and bronze coloured aluminium railings with brick reveals. A darker brick would be used for the inner courtyard facades to provide depth and contrast where the external envelope is either recessed behind an inset and or with Juliette balconies fitted with glazed panels. Precast concrete and window surrounds with double course brickwork is proposed to create elegant frame around windows and takes inspiration from the detailed beauty of the Assembly Hall. A colour ceramic green tiles would line the recesses next to the entrance doors to act as a feature and provide greater legibility and street presence of residential entrances throughout the development. Through detailed analysis of the surrounding area and the appearance has been tested, refined, and interrogated throughout the design process. Robust, natural, and hard-wearing materials have been selected to create a high-quality material palette that offers an attractive, visual interest according to the height and scale of the various blocks. Pale brickwork with decorative pipework would be used to reflect detailing of the Town Hall which features pipe patterned with the Borough's logo.
- 10.190. In terms of the Civic building, the common feature to both Town and Assembly Halls is that each clearly indicates a main entrance with a portico. Each portico has a distinctive

character, proportion and massing that reflect the buildings' use. A number of notable features on the existing Town and Assembly Halls provide inspiration for the New Civic Building:

- Whilst the stone building is elegantly simple from afar, there are refined carved Portland stone details at the base, windows, corners, columns and roof parapets.
- Each of the historic buildings has friezes adorning their entrance porticoes - the one above the Assembly Hall is the first part of a William Morris quotation.
- Other complementary materials provide moments of colour and contrast.
- Examples include the copper-clad clock tower to the Town Hall and triple-height gilded glazing to the Assembly Hall foyer.
- Moments of more subtle refinement can be found in the Town Hall's wrought-iron balconies or drainage lead work.

10.191. The proposed frieze adorning the entrance portico above the Assembly Hall, bearing a quotation by William Morris, would be completed on the front façade of the new civic building in the new scheme; this "nod" to the past. The plinth, carved windows reveal, cornices, porticoes, friezes carvings are strongly supported by Design and Conservation officer and the GLA as it provides character and a reference to the historic context of the site. Final details of external and hard landscaping materials would be secured by condition subject to planning approval.

10.192. Overall, it is considered that the proposed development would be visually integrated and complement the heritage setting with an acceptable visual consistency through different tones and material features. Blocks with a change in brick colour, the ordering of the façade a, brick detail and balcony colour would create visual interest and reduce a sense of massing.

Public Realm

10.193. Policy D8 of the London Plan (2021) sets out robust criteria to ensure that new public realm is well-designed, safe, accessible, inclusive, attractive, well-connected, related to the local and historic context, and easy to understand, service and maintain. Landscape treatment, planting, street furniture and surface materials should be of good quality, fit-for-purpose, durable and sustainable. This policy D8 also promotes the provision of drinking water fountains in the public realm.

10.194. The proposed development would have a strong landscaped-led focus. The scheme would introduce new pedestrian linkages/desire lines and enhanced cycle routes that would provide new connectivity. The development would introduce high quality public realm and placemaking, which would be connected through new routes that converge on to Forest Road to the south. This would reinforce pedestrian routes and enhance visual outlook along the Forest Road Corridor serving as a spatial gap between the blocks and the Civic building, Town Hall, and Assembly Hall.

10.195. As advised by GLA, the applicant should provide a drinking water fountain within the public realm and this should be secured by condition as well as its ongoing management and maintenance.

10.196. Officers consider that the development recognises the opportunity to transform the quality of the public realm and maximise green infrastructure and access to open spaces, as the proposed landscaped areas would be linked to existing open spaces and within the new urban built form. The proposed open and communal spaces would

secure social interaction and would not only be well integrated with the significant green features of the wider site and achieve an acceptable relationship with the buildings and frontages within their perimeter.

Conclusion

- 10.197. Proposed development represents a significant opportunity to meet the borough's housing targets as well as redefining the sense of place at this special civic site. Officers recognise this opportunity and developed a robust masterplan that underpins strong architectural ideas and supports a comprehensive landscape strategy.
- 10.198. Alongside refurbishment to the listed Town Hall, a new Civic Building can ensure that London Borough of Waltham Forest staff have a modern and attractive space to work so they can best serve and support the needs of the borough's residents. The arrangement of residential blocks and the emerging architecture appears confident and seeks to emulate the qualities of the existing listed buildings.
- 10.199. As such, it is considered that the proposed development is acceptable in design, visual, and massing terms as it would suitably respond to the forms of development that are considered appropriate within this strategic growth area. The principle of tall buildings on this site is considered justified and is supported by adopted and emerging policy. As such, the buildings would create a sense of place and identity. The tallest block would serve as a visual landmark when viewed from public vantage points. The proposal would therefore be consistent with the objectives of Policies CS2 and CS15 of the Waltham Forest Local Plan Core Strategy (2012), Policies DM29, DM31, DM32 of the Waltham Forest Local Plan Development Management Policies (2013) and policy D9 of the London Plan (2021).

I. IMPACT ON HERITAGE ASSETS

- 10.200. The NPPF (2021) states that when considering the impact of the proposal on the significance of a designated heritage asset, great weight should be given to the assets' conservation and the more important the asset, the greater the weight should be. Where development will lead to 'less than substantial harm', the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.
- 10.201. Policy HC1 of the London Plan (2021) 'Heritage conservation and growth,' states that development should conserve heritage assets and avoid harm, which also applies to non-designated heritage assets. Any harm must be given considerable importance and weight.
- 10.202. Policy CS12 of the WFLP Core Strategy (2012) states that in managing growth and change, the Council will promote the conservation, enhancement and enjoyment of the Borough's heritage assets and their settings.
- 10.203. Policy DM28 of the WFLP DM Policies (2013) supports Policy CS12 stating that development proposals which may affect the significance of heritage assets in Waltham Forest (both designated and undesignated) or their setting should demonstrate how these assets will be protected, conserved and where appropriate enhanced.

Built Heritage

- 10.204. Chapter 7 of the submitted Environmental Statement (ES) assesses the impact on heritage assets during construction and once the development is completed. This is

further considered in the Environmental Statement section discussed later in the report at Section 11.

Impact on the setting of Listed Buildings

- 10.205. The planning application is accompanied by a Heritage Statement prepared by Orion Heritage together with Townscape and Visual Impact and Built Heritage assessments that form part of the ES. Together these assess how the proposed new buildings affect the setting and significance of the Grade II Town Hall and Assembly Hall and the surrounding non-designated heritage assets. The proposals have been informed by pre-application discussion with the Council, Design Review Panel, and GLA, and Historic England have confirmed that the proposal is outside their remit for comments.
- 10.206. The principles of the development, seeking to achieve a design of the Civic Building with a modern 'completion' of the Hepworth Masterplan, and the general siting and sensitivity towards the heritage assets is supported by the Council's Design and Conservation officers. The Heritage Statement concludes that the demolition of the Magistrates Building and construction of the proposed Civic Centre would enhance the significance of the established assets by contributing to the group value of these assets, including reinstatement of the originally intended symmetry.
- 10.207. Some points of concern were raised regarding the scale of Block B, and how this would impact views of the Town Hall from the NE corner of Chestnuts Field (Spruce Hill Avenue gate), along with lesser concerns with the pop-up height aspect of Block C. An assessment of the proposed development and how each aspect of the proposal would impact the setting of the listed buildings has been carried out by the applicant's Heritage consultants. With regards to the residential blocks flanking the Town Hall, it is considered that these would have an impact upon its setting, but this is not assessed as a negative impact except for the extension of Block B, beyond the northern boundary of the Town Hall. Whilst the assessment acknowledges that Block B would have an impact upon the setting of the Town Hall building which would impact its artistic and architectural value. This harm is assessed to be less than substantial. This impact would be due to the length of Block B and its potential to minimise the view of the rear elevation of the Town Hall from the north-eastern corner of Chestnuts Field (Spruce Hill Avenue gate). This is considered a secondary view of the Town Hall but not diminishing the value and significance of the importance to the overall setting. The Town Hall would not be directly obscured, some views of it would be limited from eastern parts of Chestnut Fields although it would remain fully visible from the Garden Allotments.
- 10.208. The Council Conservation officer advises that... *"the proposal represents an excellent opportunity to harness one of the Boroughs finest and most visible (on account of its scale and distinctive landmark character) heritage assets, i.e., the complex of buildings and landscaped setting as whole, as a catalyst for heritage-led regeneration. Paragraph 190 of the NPPF is relevant. The proposal will result in less than substantial harm to significance, engaging paragraphs 200, 202 and 203 of the NPPF and this harm needs to be weighed up against public benefit, which in this case is of some magnitude."*
- 10.209. The immediate setting of the Town Hall and Assembly Rooms has been impacted upon negatively to some degree by new buildings i.e., Sycamore House/Chestnuts, car parking areas, and other incremental changes, particularly to the rear. However, the open and spacious character of the site remains very much discernible, with the formal landscaped lawn and soft/hard landscaping, central fountain, and symmetrical layout of the built form and the spaces between the buildings presenting to Forest Road much as they would have in the mid-20th Century. The Magistrates (unsuccessfully) 'completed'

the arrangement in the 1970s, where Hepworth's original concept would have included a building completing the set of buildings with the Town Hall as a centrepiece. The landscaped open setting and the dramatic designed view across the site from the south is still, overall, intact.

- 10.210. In terms of the wider setting, the approach to the Town Hall and the townscape quality in the immediate vicinity does not engender a sense of 'arrival.' To find yourself in front of the Town Hall is quite a surprise on the perambulation along Forest Road, certainly from the west, less so from the east, where the Waltham Forest College building provides a gentle introduction to the municipal buildings. In this regard, there is an opportunity to add townscape value and contribute to the sense of place.
- 10.211. Loss of the Magistrates (and other later buildings within the site) is accepted in principle as discussed early in the report. The Civic Building would replace the Magistrates and complete the original conceptual layout achieving a degree of symmetry. This is a positive and crucial constituent of the development. The simple stripped-back design and the elevation fronting the Civic Square would positively integrate with the standing buildings. The overall design approach is welcome and of a quality that is welcomed. In this regard, the Civic Building would add townscape value and have an enhancing effect on the setting of the group of heritage assets.
- 10.212. Issues have been raised over the impact on the setting of the Town Hall, notably regarding the rear views across Chestnuts Field, where proposed Blocks B (4-5 storeys) and C (6-9 storeys) with respect to scale and massing and the visual impact. Block B extends significantly to the rear, near the Town Hall and Block C wraps around to the rear of Waltham Forest College. As such, there would undoubtedly be an impact on the setting of the buildings collectively. The view from the north is a secondary view (and not as important in terms of setting to the significance of the heritage assets as the primary planned view from the south), however, it does still form part of the open setting and therefore contributes to the significance of the heritage assets. Chestnuts Field remains an open field, albeit, for recreational purposes, and partially retains the original field boundary of Chestnuts Farm. It represents a view of the rear of the heritage assets from public open space. It is from this vista, looking south and SW from the field that many people will experience the Town Hall complex. The proposed built form, in particular, Blocks B and C would alter this view, and therefore the experience of the Civic ensemble from the north will change, resulting in less than substantial harm engaging paragraph 196 of the NPPF.
- 10.213. There are some concerns regarding the impact of the Block C in terms of scale, massing and siting in conjunction with Block D (5 storeys). The development would impact on the setting of Waltham Forest College which currently presents to Forest Road as a separate building, but with visual links in townscape terms to the Town Hall complex, being grand in scale and municipal in appearance. The proposal would alter the relationship and the existing separation of the two sites, but the harm is considered at the lower scale of harm. There would also be a harmful impact on the setting of the Assembly Hall as it would be surrounded by built form to the north and east.
- 10.214. Clearly important views would be changed including the primary vista from the south towards the site, taken from Waltham Forest College. From within the square itself, the experience of the heritage assets would alter by virtue of the introduction of new buildings. It is recognised that the impact on setting (and therefore significance) would be mitigated to some degree by the quality of design, adding townscape value. The primary elevation of the Town Hall and Assembly Hall would not be obscured.

- 10.215. In relation to the townscape and visual effects of the development, whilst some potential impacts have been identified, no further mitigation is proposed as the design is coherent and provides the achievable and required townscape and visual mitigation embedded into this design.
- 10.216. As such, the ES concludes that heritage and visual effects of the development would be minor, consistent with the Heritage Statement's conclusion of less than substantial harm. The ES generally finds that the design of the development provides sufficient embedded mitigation for these effects.
- 10.217. The scale and mass of Block B to the east of the Town Hall are considered necessary to provide the required level of accommodation, including the high proportion of affordable homes, within the scheme. The housing quantum also facilitates the construction of the new Civic Building which is needed by the Council to continue their civic function on this site, thus ensuring the Town Hall can be retained within its intended setting and use. Therefore, although it is noted that the reduction of views does cause less than substantial to the architectural significance of the Town Hall by development within its setting, it is considered to be outweighed by the significant public benefits of the scheme.
- 10.218. In all other aspects, the assessment carried out in the Heritage Statement finds that the proposed development is beneficial, and in some respects, even enhancing of the heritage assets on and around the site both individually and in terms of their group value.
- 10.219. The 20th Century Society raise an objection to the demolition of the Magistrates building for reasons that the existing building makes a positive contribution to the environs and heritage setting. For reasons given above, officers disagree that this building makes a positive contribution and that its demolition and replacement would provide greater benefits and a more cohesive relationship to its heritage setting. It would deliver a high quality building that complements and preserves the significance of the Listed Buildings and makes more effective use of the land.
- 10.220. The Ancient Monuments Society (AMS) expressed their support for the regeneration of the wider site and the introduction of new buildings and uses to enliven the campus. The proposed new buildings emulate the established Nordic classicism of the Town Hall and Assembly Hall without being pastiche replicas. This is welcomed and supported by AMS and the construction of a new civic building on the site of the Magistrates Court. They advise that this would provide a strong edge to the forecourt and complete P.D. Hepworth's original design intention for the three civic buildings. Together, the buildings form a somewhat magisterial composition with a central axis focused on the Town Hall. Hepworth's design reflected the civic pride and strong image the then Council wanted to project when it commissioned the buildings in the 1930s.
- 10.221. Whilst AMS Trustees support the opportunity for new buildings within the wider area and generally support the design approach, they consider that the extent of new buildings proposed to the east and west of the Town Hall results in an over-massing of the site. The new residential buildings encroach on the currently open setting of the Town Hall and Assembly Hall, reducing their dominance in the landscape and therefore causing considerable harm to their overall significance. Officers aided by the Council's Conservation Officer have taken the view that the harm is less than substantial and the in the planning balance the public benefits weigh heavily.
- 10.222. As described, an ES has been submitted due to the large-scale nature of the proposed development with Built Heritage and Archaeology and Townscape and Visual Effects

topics scoped in. This includes Heritage and Visual Impact Assessment chapters and it is considered that the proposal would result in no more than a minor adverse impact on the significance of designated and built heritage assets within and adjacent to the Site. The ES finds that the development would have no more than a minor effect on the built heritage assets of the site, and no cumulative impacts. Furthermore, no significant residual adverse effects have been identified in relation to built heritage and archaeology matters subject to conditions to ensure mitigation and monitoring measures are carried out.

- 10.223. It is also considered that there would be no impact on the setting of Grade II Listed Brookcroft and designated conservation areas are sufficiently distanced from the site to be affected by the development. Other heritage assets on the site are a War Memorial, Flagpoles, Gates, Gate Piers, and Railings which are also Listed Grade II. With the exception of the later added War Memorial, their group value is noted in the Listing citations. On the site, the main focus is the Town Hall itself, with its associated Assembly Hall. These buildings are in the process of being refurbished, works which is separate from the development discussed in this report, therefore not considered. Only the impact of the proposals, to which this report refers, on the Town Hall and Assembly Hall's significance by development within their individual and combined settings. Save, the proposals do not involve alteration works to the Heritage Assets themselves, therefore their significance is not harmed.
- 10.224. As such, overall, it is considered that there would be no harm in many respects, and harm that is caused would be less than substantial as a result of the proposed development and is outweighed by the public benefits in the planning balance engaging NPPF Paragraphs 184–202 and in accordance with the London Plan (2021) Policy HC1 and WFLP Core Strategy (2012) CS12 and WFLP Development Management Policies (2013) Policy DM28.

J. TRANSPORT AND HIGHWAYS

- 10.225. The NPPF (2021) states that development should take opportunities to promote walking, cycling and public transport use.
- 10.226. Policy T1 of the London Plan (2021) states that proposals should support the delivery of the Mayor's strategic target of 80% of all trips in London to be made by foot, cycle or public transport by 2041 and requires development to make the most effective use of land, reflecting its connectivity and accessibility by existing and future transport, walking and cycling routes and ensure that any impacts on London's transport networks and supporting infrastructure is mitigated.
- 10.227. Policy T5 of the London Plan (2021) seeks proposals to help remove barriers to cycling and create a healthy environment in which people choose to cycle by securing the provision of appropriate levels of cycle parking, which should be fit for purpose, secure and well located. Policy T6 of the London Plan (2021) states that car parking should be restricted in line with levels of existing and future public transport accessibility and connectivity and requires appropriate disabled persons parking for Blue Badge holders to be provided as set out in Policy T6.1 of the London Plan (2021).
- 10.228. Policy CS7 of the Waltham Forest Local Plan Core Strategy (2012) sets out that the Council will promote sustainable travel by guiding development to accessible locations, including town centres, to reduce the need to travel by car and to encourage walking, cycling and the use of public transport.

- 10.229. Policy DM13 of the Waltham Forest Local Plan Development Management Policies (2013) states that the Council will ensure that development is properly integrated with the transport network and is supported by appropriate walking, cycling and public transport links.
- 10.230. Policy DM14 of the Waltham Forest Local Plan Development Management Policies (2013) encourages sustainable travel.
- 10.231. Policy DM16 of the Waltham Forest Local Plan Development Management Policies (2013) seeks to effectively manage parking and to ensure the provision of safe and attractive parking facilities by encouraging car-free and car-capped development in locations that are highly accessible by public transport and require proposals to provide for well-designed, high-quality facilities in accordance with the Council's maximum car parking standards and minimum cycle parking standards.

Healthy Streets Assessment

- 10.232. Policy T2 of the London Plan (2021) requires development proposals to deliver patterns of land use that facilitate residents making shorter, regular trips by walking or cycling. Development proposals should demonstrate how they will deliver improvements that support the ten Healthy Streets Indicators in line with Transport for London guidance, reduce the dominance of vehicles on London's streets whether stationary or moving, and be permeable by foot and cycle and connect to local walking and cycling networks as well as public transport
- 10.233. In accordance with the Mayor's Healthy Streets framework, the applicant has undertaken an Active Travel Zone assessment which assess key routes against ten healthy streets indicators.
- 10.234. TfL supports Waltham Forest Council in delivering walking and cycling improvements across the borough as part of the Mini-Holland scheme and notes the Council's plans to improve Forest Road for cycling and the high priority given to travel by active and sustainable modes. TfL advises that a travel plan as submitted should be secured by condition.
- 10.235. The development proposes a range of public realm improvements. This includes a new pedestrian link to connect to the leisure centre to the north as well as at least nine pedestrian access points onsite from Forest Road and Farnan Avenue. TfL welcomes that cycling friendly landscaping and materials are proposed within the site in line with policies T2 (Healthy Streets) and D8 (Public realm) of the London Plan and Mayor's Transport Strategy for at least 80% to be undertaken by walking, cycling, and public transport by 2041.
- 10.236. An Active Travel Zone (ATZ) assessment has been submitted as part of the TA. The routes to key locations that have been assessed are acceptable and appropriate. The ATZ assessment shows key locations and collision data for the area of which there have been fatal, serious, and slight collisions along Forest Road and Farnan Avenue. TfL advised that the applicant should also address any highway safety issues on the adjacent section of Forest Road and consider with Waltham Forest Council, any necessary works that the applicant should fund or deliver. Any highway works should be subject to a Stage 1 Road Safety Audit (RSA) prior to determination. This is necessary to ensure compliance with London Plan policy T4 part F, which requires new development in London not to increase road danger.

- 10.237. As such, the ATZ audit has identified 20 areas for improvement which will be aided by the significant reduction in the number of vehicular trips to and from the site due to approximately 63% parking provision reduction. The applicant will relay footways and cycleways to improve safety for walking and cycling. The proposal includes further access points for pedestrians and cyclists that link the site to Forest Road, and the increased trip generation by active travel modes will require upgrades to the active travel network on the public highway to ensure safe, accessible, connected, and fit for purpose for all users, particularly vulnerable groups.
- 10.238. Officers will secure a contribution of £200,000 for Active Travel improvements to improve walking and cycling infrastructure along Forest Road and improve safety for the increased number of walking and cycling trips on the Forest Road frontage. TfL seek to secure £300,000 for public transport and active travel contribution which will be secured by s.106 legal agreement.
- 10.239. Additionally, contributions towards wayfinding outside the site would be contributed to improving the safety along Forest Road. The GLA advised that £25,000 and £50,000 for Legible London signage should be secured via s.106 legal agreement. They advised that the creation of a network of pedestrian routes through the site is strongly supported in order to improve permeability and be accessible on a 24-hour basis which should also be secured by way of s.106 agreement.

Trip Generation

- 10.240. The submitted TA prepared by Stantec sets out the person trip generation to the site. The residential trip generation has been calculated which identifies a person trip rate of 0.54 and 0.447 during the AM and PM peak respectively for the private tenants and a person trip rate of 0.86 and 0.506 during the AM and PM peak respectively for the affordable tenants. These trip rates are considered to be within the expected range.
- 10.241. According to the previously mentioned planning application for the refurbishment of the Town Hall Building it is anticipated with the refurbishment of the Town Hall building and the construction of the new Civic building that the number of council employees will increase by approximately 26% to 1,100 which is represented by parking being reduced from 387 to 115 spaces. This is aligned as part of the Travel Plan for the application for the refurbishment of the Town Hall building, new modal split targets, which aimed to decrease the number of council employees accessing the site by car and encourage more employees to use active modes of travel and public transport.
- 10.242. The trip generation for the proposed creche has been calculated which identifies a person trip rate of 9.333 and 8.134 during the AM and PM peak respectively. These trip rates are considered to be within the expected range.
- 10.243. In terms of Other Commercial Space, there will be 239 sqm (GIA) of commercial space on the ground floor of Block J. This will be classified as the new Use Class E. The use of the space is uncertain at this stage. In any regard, this would not generate any vehicle trips. All trips to and from the hub would be made on foot or by bicycle and will either be generated by the proposed development or pass-by trips.
- 10.244. In total, the site is expected to generate 1,434 trips in the AM peak and 1,336 trips in the PM peak. In the AM peak, 630 trips will be made by public transport, 428 will be made by active modes and 125 will be made by car or van. While in the PM peak 559 trips will be made by public transport, 410 will be made by active modes and 122 will be made by car or van.

- 10.245. In terms of the net trip generation, due to the proposed development at the Waltham Forest Town Hall Campus there will be an increase of 334 person trips in the AM peak and an increase of 236 in the PM peak. Many of these new trips will either be made using the public transport network or by foot. Furthermore, the proposals significantly reduce the number of parking spaces available on site so there would be a net reduction of 194 vehicle trips at the AM peak and 197 vehicle trips at the PM peak. The vehicle trips would continue to reduce as the spaces will be converted to either car club spaces or disabled parking bays as the demand for these functions increases. This represents a significant reduction in the number of vehicle trips generated by the Town Hall Campus and will help fulfil a number of the Healthy Streets Indicators, as well as helping to promote the site as pedestrian and cyclists oriented and less vehicle dominated.
- 10.246. As such, the proposed trip generation is considered acceptable in accordance with Policies T2 and T3 of the London Plan (2021).

Car Parking

- 10.247. Policy T6.1 of the London Plan (2021) states 3% disabled parking should be provided from the outset, and provision for the remaining 7% marked out on a plan. Paragraph 10.6.10 of the London Plan also states that these spaces should not at any point be used for general parking.
- 10.248. Policy DM17 of the Waltham Forest Local Plan Development Management Policies (2013) states that one disabled parking space should be provided for each wheelchair unit within a development (10% of units). The proposed provision of wheelchair accessible bays would meet this policy requirement. The wheelchair bays would be located close to the residential lift cores.
- 10.249. Emerging Waltham Forest Local Plan (2020) Appendix 1 Table 1.3 sets out the Council's preferred car parking standards. As a general principle, the Council will seek to encourage parking provision below the maximum figures stated. However, the minimum number of off-street disabled parking spaces are to be provided at 5% of the total number of dwellings in the development with a 2% passive provision to be made, making it 7% in total to be brought into use at such time as the additional spaces are required in the future.
- 10.250. The residential element of the scheme is to be car-free except for 3% (14) blue badge parking bays which would only be available to residents who have a blue badge. This level of provision represents a minor shortfall of 2% with regard to the emerging Local Plan standards as stated above. However, this provision is consistent with the London Plan at 3% provision and as the applicant is committed to delivering 7% passive as part of the Parking Design and Management Plan which would be secured by condition subject to planning approval, this is considered adequate. As such, Officers consider this level of provision acceptable as there is potential for the number of spaces to increase to 10%. The Parking Design and Management Plan would also set out how residents holding blue badges can apply for and be allocated disabled parking spaces. A total of 2 standard parking bays are proposed for car club with electric charging points, with one year of free membership for future residents which will be secured by way of s.106 legal agreement.
- 10.251. To optimise the development potential of the site and make effective use of the land, most of the existing 387 general car parking spaces currently available at the site would be removed and built on. A total of 143 vehicle parking spaces is retained, which would be mostly provided in undercroft car parks in Blocks B and C except for disabled

parking spaces, service bays, and car club spaces which are at grade level. The proposed parking quantum includes:

- 107 standard spaces for employees of the Civic building
- 8 civic function disabled spaces
- car club spaces
- 6 civic function pool car spaces
- 6 service / drop-off bays
- 14 disabled spaces for the residential units

10.252. As such, the proposed car parking provision represents a significant 63% reduction. This is strongly supported by the GLA and TfL and the promotion of active travel and public transport. 6 pick-up/drop-off bays and 6 parking spaces for car-sharing are also proposed, which are acceptable as they will support sustainable travel and accessibility for all. Officers strongly welcome this reduction. However, officers are aware that a further reduction in parking provision should be reviewed in the future and therefore it has been agreed with the applicant that every 5yrs a review of parking provisions with a view to further reducing car parking and vehicular commuting be carried out to the satisfaction of the Council.

10.253. For the above reasons, subject to conditions and review mechanism, the proposed level of car parking for the development is considered acceptable in accordance with Policy T6.1 of the London Plan (2021), Policy CS7 of the WFLP Core Strategy (2012), and Policy DM14 of the WFLP DM Policies (2013).

Cycle Parking

10.254. London Plan (2021) Policy T5 and Table 10.2 set out the minimum standards for new development cycle parking provision.

10.255. Appendix 4 of the WFLP Development Management Policies (2013) sets out the Council's cycle parking standards. The minimum cycle parking provision for the residential element is 702 long stay cycles spaces. According to the emerging plan Local Plan in Appendix 1, the provision would be 840 long stay spaces and 11 short stay with a ratio is 65% two-tier, and 30% Sheffield and 5% cargo). For the commercial element, the minimum cycle provision for the (A2-A5 on ground floor) is 1 long stay space per 175sqm and 1 space per 20sqm short stay spaces. For the office element, it is 1 space per 50sqm.

10.256. For the commercial and residential elements as per Table 10.2 of the London Plan (2021) is set out in the tables below:

Civic Building (Ground Floor)		
	Long-Stay Cycle Parking	Short-Stay Cycle Parking
Policy Document	London Plan (2021)	
Standards (Use Class A2-A5)	1 space per 175 sqm (GEA)	1 space per 20 sqm (GEA)
Floor Area (sqm)	1,376 sqm	
Cycle Parking	8 spaces	69 spaces

Civic Building (Office)

	Long-Stay Cycle Parking	Short-Stay Cycle Parking
Policy Document	LBWF - Development Management Policies	
Standards (Use Class A2-A5)	1 space per 50 sqm	
Floor Area (sqm)	2,870 sqm	
Percentage Split	87%	13%
Cycle Parking	50 spaces	7 spaces

Residential Cycle Parking

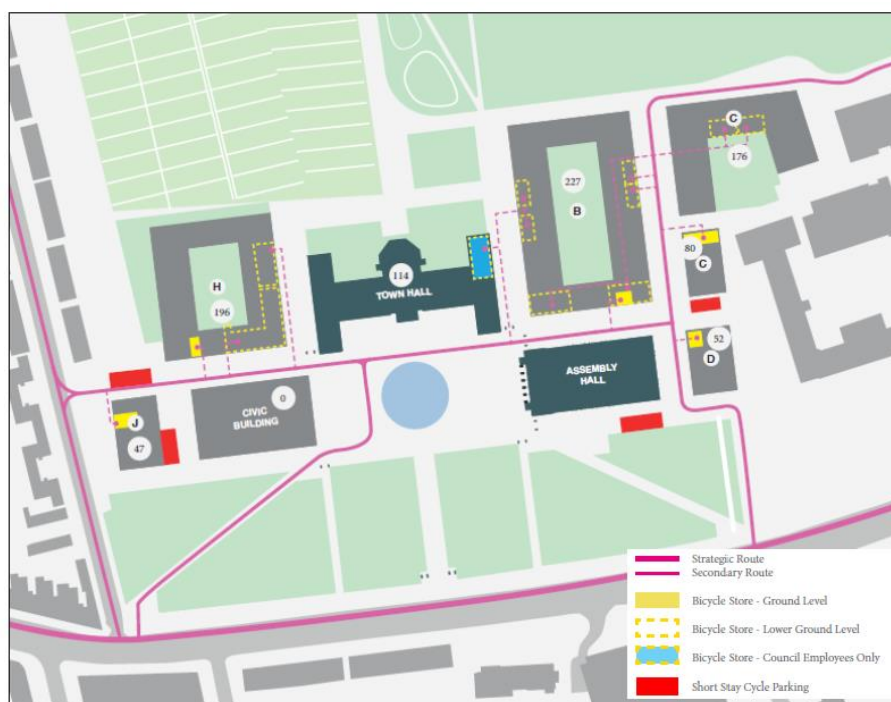
	Long-Stay Cycle Parking	Short-Stay Cycle Parking
Policy Document	London Plan (2021)	
Standards		
Studio / 1 bed, 1 person unit	1 space	2 spaces per 5-40 units. Thereafter: 1 space per 40 units
1 bed, 2 person unit	1.5 spaces	
All other units	2 spaces	
Residential Units		
Studio / 1 bed, 1 person unit	30	
1 bed, 2 person	134	
All other units	269	
On-site Cycle Parking Provision		
Studio / 1 bed, 1 person unit	30 spaces	18 spaces
1 bed, 2 person	201 spaces	
All other units	538 spaces	
TOTAL	770 spaces	

10.257. The full breakdown and the long stay residential quantum for each block are shown in the tables below:

USE	LONG STAY	SHORT STAY
Residential	770	18
Civic (Café)	8	69
Civic (Office)	50	7
TOTAL	828	94

Block	Minimum number of Cycle Parking Spaces
Block B	240
Block C	257
Block D	44
Block H	183
Block J	46
TOTAL	770

10.258. The cycle parking for the proposed residential element would be provided at ground level in secure cycle store that would be well-lit and accessible. This is shown in the illustration below:



10.259. In total, the proposed residential and commercial cycle parking provision and details will be secured by way of condition subject planning approval. This level of provision broadly accords with London Plan standards and is welcomed and meets the aspiration of delivering enhancements and promoting active travel – Enjoy Waltham Forest - and Mini Holland scheme.

10.260. To achieve adequate ratio in accordance with the London Plan (2021), where the types of stands should seek a maximum of 65% two-tier, minimum of 30% Sheffield stands, minimum of 5% accessible (cargo/adapted) cycles and 2% recommended secure lockers should be sought. The TA does not set out the ratio so these details will be secured by condition on this occasion.

- 10.261. As such, subject to condition, overall, it is considered that the proposed quantum of cycle parking is acceptable and note the cycle parking planning condition would also require details how the scheme meets the LCDS guidance as far as reasonably possible and ensuring acceptable stand types ratio. On this basis, subject to conditions, is considered acceptable in this regard.

Electric Vehicle Charging Points (EVCP)

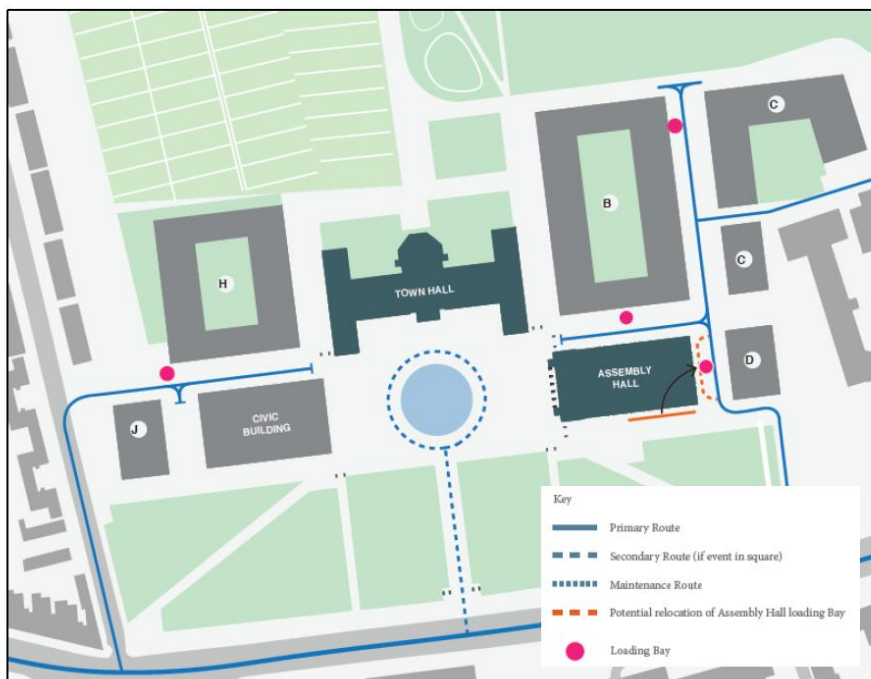
- 10.262. Policies T6.1 and T6.5 of the London Plan (2021) sets out the emerging EVCP requirements. At a minimum, the London Plan (2020) requirements for electric charging points should be met. This is one charging unit for 20% of spaces, with the remaining spaces provided with passive provision.
- 10.263. It is noted that 20 per cent of disabled parking spaces would have active Electric Vehicle Charging Points (EVCP), with passive provision for the remaining spaces. This accords with the London Plan. The two car club bays would be fitted with fast charging points, which is welcomed. TfL advise that the 33 office car parking spaces compliant with London Plan Table 10.4, all of the car parking proposed for the civic hub should be treated as operational and therefore include active Electric Vehicle Charging Points (EVCPs) from the outset as required by Policy T6 of the London Plan.
- 10.264. The allocation of active and passive electric vehicle charging points would be secured as a condition to any planning permission. The Car Parking Management Plan would detail how electric vehicle charging points would be introduced as demand for these increases. This will also be secured as a condition subject to planning permission.

Travel Plan

- 10.265. A Framework Travel Plan has been prepared by Stantec to accompany the planning application. This has been reviewed by TfL and the Council's Highways and Transportation teams and considered broadly acceptable subject to a contribution of £200,000 towards Active Travel Behaviour Change Initiatives for the new residents, employees, visitors, and families visiting and utilising the new development. This is to ensure a legacy of significant legacy of behaviour change is implemented and sustained bespoke training for families and staff should be offered due to the car-free nature of residential development and aspirations for commercial elements. The Travel Plan will be secured by s.106 legal agreement and a financial contribution towards monitoring will be secured also.

Servicing and Access

- 10.266. The submitted Delivery and Servicing Management Plan prepared by Stantec confirms that delivery and servicing requirements of the proposed development have been considered and integrated into the design.
- 10.267. To ensure delivery and servicing vehicles can access the site, 6 service/drop-off parking spaces are proposed to accommodate small to medium delivery and servicing vehicles, and larger delivery and servicing vehicles would be able to park at appropriate on-street locations. The location of these bays is illustrated below:



- 10.268. Three of these service/drop-off parking spaces are located together to create a large loading bay, adjacent to the Assembly Hall and opposite Block D. This is to accommodate HGVs, which need access to the site at times when large events are being held at the Assembly Hall and a swept path analysis demonstrates the ability of a 16.5m length articulated vehicle to access this bay and then turn around using the side road between the Assembly Hall and Block B.
- 10.269. Delivery and servicing are proposed via 6 service/drop-off parking spaces on-site. Originally some of these were proposed in front of access points to cycle parking. Loading bays should not interrupt walking and cycling desire lines either and TfL raised concerns that the current Traffic Assessment (TA) lacks sufficient information on expected delivery and servicing trip rates and impact mitigation. Notwithstanding this, a detailed Delivery and Servicing Management Plan will be secured by condition subject to planning approval to include the detailed design and waste collection arrangements for both residential and private waste collection associated with the other uses. This document will also provide detail on the management of the servicing bays, and necessary enforcement measures, and how the delivery and servicing arrangements will adhere to the Mayor's Vision Zero approach.
- 10.270. As such, subject to condition, it is considered that the proposal is in accordance with Policy DM32 of the WFLP DM Policies (2013) and Policy T7 of the London Plan (2021).

Construction Logistics Plan

- 10.271. Policy T7 of the London Plan (2021) set out the policy for assessing the effects of development on transport capacity.
- 10.272. Policy DM13 of the WFLP DM Policies (2013) states that the Council will ensure that development is properly integrated with the transport network by requiring development proposals to submit Construction Logistics Plans, Delivery and Servicing Plans and the uptake of the Freight Operators Recognition Scheme where appropriate in accordance with the London Freight Plan and coordinated with travel plans.

- 10.273. Policy DM15 of the WFLP DM Policies (2013) states that the Council will ensure the most efficient use of the borough's available highway network by requiring development to connect to the highway network in a way that encourages road users to use the most appropriate road in accordance with Waltham Forest's road hierarchy and discouraging through-traffic from using local roads and avoiding individual access direct to the Transport for London Road Network, Strategic Road Network and district distributor roads.
- 10.274. The Council's Highways Development Team requested a number of changes and clarifications to the submitted Outline Construction Logistics Plan (OCLP). A revised OCLP was submitted in July 2021. In line with Policy T7 of the London Plan (2021), a full Construction Logistics Plan (CLP) will be secured through condition subject to planning approval.

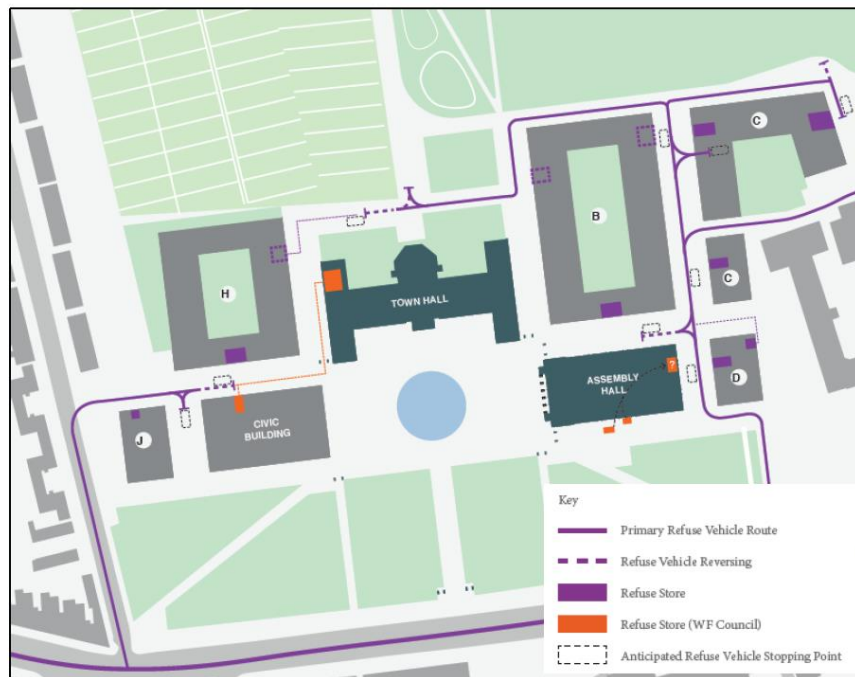
S278 Agreement

- 10.275. The following sets out the applicant's proposed scope of works that would be set out in the S106 Agreement, which would be secured in more detail within the S278 Agreement. The applicant is committed to working with the Council and other stakeholders to ensure that all necessary and relevant mitigation measures are delivered as part of the proposed redevelopment and this collaboration shall continue beyond any Planning Committee Members' resolution given the overall development programme.
- 10.276. The area within which the proposed highways works would be carried out shall be provided by the applicant and to the agreement with Waltham Forest. The Section 278 Agreement would include (but not limited to) the following works:
- A review of expected pedestrian movements, and accommodation for these in a new highway layout.
 - A review of expected cycle movements accessing the site, considering the new cycle entrances and a redesign to ensure opportunities for conflict are mitigated by design.
 - Renewal of the footway on the frontage of the site
 - Blended crossing at the vehicle entrance along Farnan Ave. Suitable provisions should be made for pedestrians and cyclists accessing the site from the North.
 - Suitably raised entrance at the vehicle entrance along Forest Road.
 - Upgrades to public lighting, taking into consideration the increased pedestrian and cycle movements. Realignment may be required due to the resultant road space redistribution
- 10.277. Given the above considerations, it is considered the proposal would be acceptable in highways terms subject that a s.278 Agreement is secured for the above works, Section 106 obligations, and conditions. The development would therefore be consistent with Policies DM13, DM14, and DM16 of the Waltham Forest Local Plan Development Management Policies (2013).

K. WASTE MANAGEMENT

- 10.278. Policy SI7 of the London Plan (2021) seeks to reduce waste and support the circular economy.
- 10.279. WFLP Core Strategy Policy CS6 promotes the prevention and reduction of waste and requires new developments to provide adequate and well-designed internal and external storage facilities for residual waste and recycling.

- 10.280. Policy DM32 of the WFLP DM Policies (2013) states that new developments should ensure that the provision of adequate facilities for the storage, collection, and disposal of refuse is well secured.
- 10.281. The applicant has adhered to the Council's 'Waste and Recycling Guidance for Developers, Storage and Collection Requirements' (2017). The Council does not have specific guidance for non-residential uses, so generation rates have been taken from guidance used by other London Boroughs. This ensures a robust assessment of the expected waste generation.
- 10.282. All vehicles entering and exiting the site, including waste collection and servicing would be able to do so in forward gear off Forest Road, utilising turning areas within the site if necessary or undertaking through movements. The swept paths and vehicle movements drawing shows that the waste vehicles will be reversing within the public areas where it could interact with pedestrians of various physical abilities. Highways customarily encourage developers and support schemes that work to reduce the potential for conflict by reducing as many reversing manoeuvres as possible.
- 10.283. Residential refuse will be collected by the Council's refuse collection vehicles. These vehicles would access the site from two points to service different blocks. The first point is the main access on Forest Road and the second point is on Farnan Avenue. In both locations, the refuse vehicle would enter the site, collect the refuse, and then turn around and leave the site in forward gear. The illustration below indicates routes to be taken by the refuse vehicles, stopping points, and refuse store proximities:



- 10.284. Waste collection from the wheelchair accessible units would be carried out by the site's estate management team who would collect the refuse directly before transferring to the waste stores. The estate management team would store, and rotate bins as required to ensure there is always an empty bin available to residents for each of the three waste streams (recycle, residual, and food).

10.285. All residential waste will be collected by LBWF on a weekly basis via servicing bays which are located within acceptable drag distance of the bin stores and would meet the following requirements:

- Studio / 1 bed units – 100 litres for waste and 100 litres for dry recyclables per property of this type
- 2 or more bed units – 120 litres for waste and 120 litres for dry recyclables per property of this type

10.286. For the Civic building which would accommodate an office, café / restaurant, in line with LBWF Waste & Recycling Guidance for Developers, the following waste storage capacity is required for the use classes listed below:

- Office space should provide “2 cubic metres of waste storage per 1,000 sqm of gross floor space. 70% of this capacity must be retained for the storage of separated waste for recycling.”
- Food outlets should provide “3.5 cubic metres of waste storage per 1,000 sqm of gross floor space. 70% of this capacity must be retained for the storage of separated waste for recycling. Food waste storage capacity can be counted against recycling materials storage capacity”.

10.287. It is noted that commercial waste is a private matter and the operators may need to arrange more than one collection per week.

10.288. As such, it is considered that any waste management/servicing could be achieved through an updated Waste Management Strategy secured by condition in accordance with Policy DM32 of the Waltham Forest Local Plan Development Management Policies (2013).

L. EDUCATION AND HEALTHCARE PROVISION

10.289. Policy CS3 of the Waltham Forest Local Plan Core Strategy (2012) seeks to ensure that appropriate infrastructure is provided to cater for the needs of existing and future populations.

10.290. Policy DM17 of the Waltham Forest Local Plan Development Management Policies (2013) also seeks to ensure appropriate social infrastructure is provided on development sites, where there is a need.

10.291. With regards to Early Years provision, officers state there are no major gaps in the demand for childcare in Chapel End ward, with some surplus of spaces in neighbouring wards. Therefore, currently there is no demand for additional early year spaces from this proposed development. Whilst this is the case, the applicant has allowed for the flexible use space, large enough to be used for a community type use. However, as advised, the units that would be available would not have direct access to an outdoor play area and the close proximity to the Forest Road is not desirable.

10.292. It is noted that the Council-led Town Hall Fellowship Square redevelopment proposals comprises a nursery for which the Council's Early Years Officer accepted that this would be sufficient to meeting any future shortfall in the area provided it would be secured by condition to ensure the delivery is timely and the operator is Ofsted registered.

10.293. For primary and secondary school provision, officers have evaluated the proposed number of units and mix based on the delivery of the scheme and the outcome

suggests that the development would yield approximately 1FE (a class of 30) in secondary. There is noted capacity in Holy Family School due to the recent expansion of this school to meet some of the projected needs but not all. Accordingly, no objection is raised by the Council's Education Department subject to an additional 1FE of school places to meet predicted residential growth in this area. It is noted there are sufficient places in local primary schools to absorb predicted growth in primary demand. As such, a contribution of £176, 607.15 will be secured for additional places by way of s.106 legal agreement.

- 10.294. Policy GG3 (Creating a Healthy City) of the London Plan (2021) specifically refers to the need to assess the potential impacts of development proposals on the health and wellbeing of communities e.g., through an HIA.
- 10.295. Regarding healthcare provision, the application is accompanied by a Rapid Health Impact Assessment (HIA) prepared by Stantec based on the HUDU tool matrix.
- 10.296. As outlined in the Economic Statement (Stantec, 2021), there are 44 GP practices throughout Waltham Forest, of which 19 practices are located in Walthamstow. Hospital services are provided by the Barts Health NHS Trust which operates from four major hospital sites (The Royal London, St Bartholomews, Whipps Cross, and Newham) and community health facilities such as Mile End Hospital.
- 10.297. The 433 residential units delivered through the scheme are expected to accommodate circa 1,360 new residents as per the design and tenures detailed in the accommodation schedule. It is anticipated that a moderate proportion of these residents will be locating from elsewhere within Waltham Forest and will therefore not be net additional to the area. In the context of the existing healthcare infrastructure, the net increase in residents is not expected to exceed capacity of the current provision of GP's within Waltham Forest. Similarly, the provision of dentists and opticians in Waltham Forest is assessed to have capacity to absorb the demand generated by the residents from the development.
- 10.298. In summary, access to healthcare services has been reviewed and there is a range of amenities within walking and cycling distance of the site, including public transport stations and stops, cycle routes, green spaces, schools and colleges, places of worship and food, and retail stores. No health care will be provided as part of the proposals; however, it has been identified that there is capacity within existing GPs to accommodate the new residents. Potential positive or neutral impacts have been identified for all criteria in this theme, and no disproportionate negative effects to vulnerable groups have been identified. No further mitigations or enhancement measures have been identified.
- 10.299. As such, it is considered that the proposal complies with Policy CS3 of the Waltham Forest Local Plan Core Strategy (2012) and Policy DM17 of the Waltham Forest Local Plan Development Management Policies (2013).

M. TREES, LANDSCAPING AND ECOLOGY

- 10.300. Policy CS5 of the WFLP Core Strategy (2012) seeks to protect existing healthy trees and encouraging the planting of new trees as well as protecting and enhancing biodiversity.
- 10.301. Policy D8 of the London Plan (2021) requires development proposals to encourage and explore opportunities to create new public realm where appropriate. Proposals should ensure the public realm is well-designed, safe, accessible, inclusive, attractive, well-

connected, related to the local and historic context, and easy to understand, service and maintain. Landscape treatment, planting, street furniture and surface materials should be of good quality, fit-for-purpose, durable and sustainable. Lighting, including for advertisements, should be carefully considered and well-designed in order to minimise intrusive lighting infrastructure and reduce light pollution.

- 10.302. Policy DM12 of the WFLP Development Management Policies (2013) states that development proposals should optimise physical and visual access between the built environment and open space. The policy also seeks to enhance green infrastructure and maximise access to open spaces within the borough by improving connectivity within the green infrastructure network.
- 10.303. Policy DM35 of the WFLP DM Policies (2013) states that the loss or damage of trees should be avoided where possible; and where this cannot be achieved, mitigation and compensation measures should be outlined and implemented.
- 10.304. The 2021 NPPF highlights the important contribution that trees make to the character and quality of urban environments as well as mitigating and adapting to climate change. The Framework seeks to ensure that new streets are treelined and opportunities are taken to incorporate trees elsewhere in developments and that existing trees are retained.
- 10.305. There are protected trees protected by TPOs exist within and along the site boundary. Whilst the scheme would retain many of the protected trees on the southern boundary, six TPO trees would be removed. The table below sets out the removal of all 34 trees, 4 groups, and 1 hedge:

	Total	BS Cat A	BS Cat B	BS Cat C	BS Cat U
Trees to be removed	34 Trees, 4 x Groups 1 x Hedge	T69, T70	T7, T34, T35, T37, T51, T53, T55, T68, T87, G3	T36, T50, T52, T54, T57, T58, T65, T71, T72, T73, T74, T75, T76, T77, T78, T79, T85, T86, T88, T89, T90, T98 G1, G2, G5, H2	-
Total	34 Trees, 4 x Groups 1 x Hedge	2 trees	9 trees, 1 Group	23 Trees 3 Groups 1 Hedge	-

- 10.306. Whilst the loss includes 1 x Category B and 5 x Category C TPO trees located within the Waltham Forest College site on their western boundary, the proposed development largely retains the high amenity trees along Forest Road and these 52 on-site trees would be supplemented by the planting of 230 new trees (native, flowering, fruit bearing), which mitigate these losses.
- 10.307. The two BS5838 Category A trees to be removed are small semimature sycamores which are commemorative trees planted to commemorate the opening of Sycamore House. If necessary, these trees can be transplanted as part of this development. Five of the Category 'B' trees are Norway maples to be removed to allow public access from the front corners of the site.

- 10.308. Officers accept the necessity to remove the protected trees subject to appropriate replanting by a well-considered soft landscaping scheme as set out in the accompanying Arboricultural Impact Assessment and Tree Condition Survey prepared by Ruskins Tree Consultancy. It is considered that broadly speaking the proposed retention, protection, and removal of trees are fit for purpose and the proposals are indeed well-conceived in view of the proposed layout, form, and scale of buildings it is designed to complement. As such, there is an opportunity to improve both the variety and all-year-round interest of trees and general soft landscaping for the site, encouraging a diverse range of species to complement the trees to be retained, support biodiversity, increase SuDS, and ensure, where required, that instant impact is achieved.
- 10.309. The Council Trees and Nature Conservation officer welcomes the retention of the category A commemorative Red Oak, T48 situated on the western side of the magistrates building. Good design should ensure that the juxtaposition of the existing trees is appropriately considered, therefore an Arboricultural Method Statement should be secured by condition subject to planning approval. Furthermore, conditions requiring a Root Protection Plan would also be imposed to ensure that site constraints are not breached and that the design process takes proper consideration in protecting the existing trees which surround the site during construction works will be included.
- 10.310. As such, subject to conditions, it is considered that the proposals are acceptable and in accordance with Policy G7 of the London Plan (2021), WFLP Core Strategy (2012) Policy CS5.

Landscaping

- 10.311. The proposed landscaping strategy seeks to respond to the context of the site and respond to an opportunity to create a relationship between the urban areas surrounding the site especially apparent along Forest Road frontage.
- 10.312. The scheme has been designed to provide new publicly accessible communal open space to benefit the new and existing residents of the local area. A sequence of landscaped spaces for play, recreation and movement are introduced through distinct open verdant areas within the scheme. The scheme proposes a high quality layout with a variety of well-defined spaces, enhanced by soft landscaping including:
- Amenity grass
 - Herbaceous planting
 - Reed/aquatic planting
 - Swale ditch planting
 - Hedge planting
 - Existing and proposed trees
 - Trees in pots
- 10.313. The application proposes to deliver adequate landscaped play space combining informal and formal play within courtyards and residential gardens totalling some 4,429sqm that interconnect with Chestnuts Field and the front lawns forming a high quality public realm throughout the site whilst respecting its heritage and existing planting. The newly created open space would be useable areas providing opportunities for existing and new residents / workers to gather and play between expansive open spaces of Chestnuts Field and the lawns fronting Forest Road. The planting of the residential courtyards is designed to provide optimum use, to be achieved with planting such as an amenity grassland mix for lawns, herbaceous flowering beds, hedges and trees, and the front lawns. These are designed to provide open green spaces connecting

to the planting beds, which are all structured around a mix of hedges and trees in pots and hedges to provide a mix of native species and form perimeter planting to the private terraces. There would be a dedicated sensory garden space to the rear of the Town Hall which include features, contrasting surfaces, seating, flowering and fragrant plants, rich wildlife that stimulate our senses through touch, sight, scent, taste and hearing for future residents and the public to enjoy. This is strongly welcomed by officers.

- 10.314. In addition, the development would provide some 2,414sqm of play area dedicated for under 5 years old and 861sqm and 1,154sqm for children between 5-11 years old and 12+ years old, respectively. The play strategy for the site has been conceived as a site-specific activity trail, which acts as a link between the Chestnuts Field and the front lawns within and adjacent to the site. These areas include designated spaces for gathering and playing, multi-functional outdoor spaces and seating.
- 10.315. In terms of hard landscaping, the strategy follows the function of each open space and delivering high quality public realm which includes uniform surface links throughout to allow servicing and deliveries which seek to provide a consistent scene with shared surface routes. The strategy also includes a linear pedestrian/cycle route through the site towards Forest Road.
- 10.316. Notwithstanding the details shown in the Design and Access Statement, conditions requiring a detailed Soft Landscaping Plan, and Landscaping Management Plan is recommended to ensure that the biodiversity of the site is enhanced, in accordance with Policy CS15 of the WFLP Core Strategy (2012) and policy DM35 of the WFLP Development Management Policies (2013).

Ecology

- 10.317. Policy G6 of the London Plan (2021) states *'Development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. This should be informed by the best ecological information and addressed from the start of the development process.'*
- 10.318. Policy CS5 of the Waltham Forest Local Plan Core Strategy (2012) seeks to enhance green infrastructure and biodiversity and protect existing habitats, species, and recognised sites. The Council aims to promote public access and improved contact with nature.
- 10.319. Policy DM35 of the Waltham Forest Local Plan Development Management Policies (2013) seeks the avoidance of effects on designated sites of ecological importance. The policy goes on to state that development proposals should provide measures to support species and habitats through the use of landscaping on or adjacent to buildings.
- 10.320. The application site is dominated by buildings and amenity grassland. Scatter trees are present throughout the site. A small stream or flowing ditch is present along the northern boundary of the recreation ground, bordered on both sides by dense scrub. Additional areas of dense scrub are present to the east and west of the recreation ground, and within discrete locations of surrounding the buildings.
- 10.321. The nearest statutory site is the Epping Forest SAC and SSSI located approximately 1km to the east of the application site and beyond this are Walthamstow Reservoirs SSSI, Lee Valley SPA and RAMSAR.
- 10.322. The Council's Tree Preservation and Nature Conservation officer advises that the principle of a diverse range of planting communities offering amenity and habitat over a

mixed matrix of planting heights is welcomed. There is a general indication of where the above plant communities are to be included within the proposed scheme, and there is a general planting palette provided within the Design and Access Statement, although there is no clear detail as to plant densities and sizes or a complete schedule of plant species to be included. Whilst the general arrangement is considered to be well designed, a greater level of detail will be required. Therefore, it is recommended that a condition be imposed requiring such detail subject to planning approval.

- 10.323. Notwithstanding the lack of some detail at this stage, officers agree with the general aims and objectives of the proposed soft landscaping and, in principle, it is a well-considered scheme. It is further advised by the Council's Conservation and Tree Officer that improvements could be made in order to provide even more species diversity and habitat provision. Such as, there is an opportunity to underplant trees on the front lawns with wildflower/herbaceous planting to create linear wildlife corridors for pollinators, birds, and ground based wildlife and it is recommended this is incorporated into the scheme. The inclusion of suitable evergreen trees to provide year round interest and habit is recommended and should be secured.
- 10.324. Accordingly, the Council's Tree Preservation and Nature Conservation officer has recommended suitably worded conditions to ensure that the proposed trees and plants should have sufficient space to grow without overcrowding or the need for excessive maintenance and enhance habitats. The scheme would be an improvement to the landscaping of the area and likely to be a sufficient net gain in biodiversity, improvement in public services that meets urban greening factor targets.
- 10.325. A Habitat Regulations Assessment has been prepared by Stantec which confirms that SAMMS and SANGs contributions are appropriate mitigations for the impact of the development on the integrity of any European designated sites, such as the Epping Forest SAC and SSSI either considered alone or in combination with other plans or projects. Accompanying this, an Ecological Assessment prepared by Stantec has been submitted with the application which includes a desktop study and site survey on the 3rd September 2020 based around extended Phase 1 as recommended by Natural England. A general appraisal of faunal species has also been undertaken to record the potential presence of any protected, rare or notable species, with specific survey work conducted in respect of bats and badgers.
- 10.326. Several ecological designations are present within the surrounds of the site, with the nearest being Epping Forest SSSI and SAC, located approximately 1km to the east of the site at the nearest point. The site is dominated by buildings and hardstanding along with scattered trees, ornamental planting, amenity grassland and some dense scrub and trees along the site boundaries. The habitats within the site are not considered to be of elevated ecological value (and limited) and as such are not considered to form important ecological features.
- 10.327. Surveys of the site have not recorded the presence of any protected or notable species namely bat records from the last 10 years. The external building inspection for bats was completed in 2020 and confirmed that buildings present within the site provided a degree of suitability to support roosting bats and offers potential opportunities to common and widespread mammal, bird, and invertebrate species associated with urban habitats. The information in this ecology assessment provides details of the ecological baseline position at the site, setting out the habitat types and species present and evaluating their ecological importance in the context of the site. The information in this report is considered to provide a sound ecological baseline, which can be utilised to inform any future proposals relating to the site.

- 10.328. Given that the site is not considered to have an ecological value under a nature and conservation perspective, the proposed design approach and implementation method for mitigating any effect would ensure that there is no adverse effect on protected species because of developing the site. Notwithstanding this, the assessment provides measures for safeguarding nesting birds, commuting bats, and invertebrates. Subject to the implementation measures outlined in the assessment, the development would have no detrimental effect on the biodiversity value of the site.
- 10.329. The application is supported by a Biodiversity Net Gain Assessment in Chapter 6 of the Ecological Assessment in accordance with Policy G6 of the London Plan (2021) and emerging draft LBWF Local Plan Policy 86. The existing site is of limited ecological value. The proposed development incorporates several on-site ecological enhancements, such as new soft landscaping and tree planting, and proposes to deliver a Biodiversity Net Gain which is welcomed. Officers, therefore, consider that the development would enhance the biodiversity value of the site by incorporating existing ecological assets into the design approach, which include introducing shrubs, native hedgerows and tree planting that would seek to attract the birds, bats and enhance the overall biodiversity value of the site.
- 10.330. As such, subject to conditions securing a Habitat Creation Management Plan to ensure biodiversity net gain, the proposal is considered acceptable in accordance with Policy G6 of the London Plan (2021), Policy CS5 of the Waltham Forest Local Plan Core Strategy (2012) and Policy DM35 of the Waltham Forest Local Plan Development Management Policies (2013).

Epping Forest Special Area of Conservation

- 10.331. Natural England has issued an Interim Advice Letter dated 6th March 2019, in relation to the Epping Forest SAC (Special Area of Conservation), which is based on updated research on the impacts on the SAC and proposed measures to mitigate those impacts with particular reference to those understood to arise from the recreational impact generated by occupiers of new development. The Local Planning Authority is a “competent authority” under the Habitat Regulations and is legally obliged to take Natural England’s advice into account in decision making and attach great weight to it.
- 10.332. Waltham Forest shares a boundary with the Epping Forest Special Area of Conservation and following research in the form of a visitor survey by Footprint Ecology, has been found to fall within a wider ZOI based on the distance most visitors will travel to visit Epping Forest SAC. This report identified that 75% of visitors travelled up to 6.2Km to the SAC and as a result of the whole of the London Borough of Waltham Forest falls within this ZOI for recreational pressure. It is anticipated that new residential development within this ZOI constitutes an LSE (Likely Significant Effect) on the sensitive interest features of the SAC through increased recreational pressure, either when considered ‘alone’ or ‘in combination’. The Council as Local Planning Authority is obliged to ensure that any grant of planning permission would have sufficient mitigation measures in place so as to ensure that there would be no harmful impact on the Epping Forest SAC arising from LSE.
- 10.333. Natural England’s Interim Guidance assumes that all new residential development within Waltham Forest will create an impact on the Epping Forest SAC which will need to be mitigated. The Interim Guidance suggests that mitigation measures should take a threshold approach whereby development of 100 dwellings or more is treated differently to schemes of 99 dwellings or less.

- 10.334. An initial draft of costed Strategic Access Management Measures has been prepared by the City of London Conservators of Epping Forest. This package of measures is to be used in the interim period until the full Mitigation Strategy has been agreed upon and adopted. However, as an indication under the interim Strategic Access Management Measures, Waltham Forest is expected to contribute circa £1m towards the mitigation works which equates to 37% of the total.
- 10.335. For applications received after 1st April 2019 a SAMM levy should be secured for all new residential developments of 10 units or more to contribute towards management and monitoring and Epping Forest mitigation. This is calculated at £100 per unit, so a contribution of £43,300 should be secured by legal agreement.
- 10.336. For schemes of 100 or more units, a Suitable Alternative Natural Green Space assessment (SANG) is also required. The applicant has produced a Habitat Regulations Assessment, which considers the applications recreational impacts of the proposed development on Epping Forest, as well as assessing the potential impacts arising from atmospheric pollution from construction and delivery vehicles routing for the development within 200m of Epping Forest.
- 10.337. The applicant via their consultant at Stantec and Gross Max engaged in dialogue with Natural England during the pre-application and planning stage and agreed a mitigation package for the development. This package includes:
- Provision of a circular walking route of c. 1,700m (1.7km) around the boundary of the Site, incorporating a path around the boundary of Chestnuts Field, extending through the built development, to the formal gardens to the south. This path will be appropriately surfaced (e.g., Hoggin type path surface) such that it is accessible to all and sufficiently robust to weather frequent usage and weather conditions;
 - Enhancement of a path exiting Chestnuts Field to the north west, which connects to the Feel Good Centre, that ultimately leads to Lloyd Park (c. 350m or 5 mins by foot), providing enhanced connectivity, enabling residents to link up existing green spaces to create a longer local walk;
 - Ecological enhancement to provide semi-natural habitat where possible in relation to the circular walking route. This will include:
 - Provision of additional tree planting around the boundary of Chestnuts Field;
 - Provision of biodiverse SuDS features in the northern-western extent of Chestnuts Field to include a permanently wet pond area with associated wetland planting. The SUDs feature will replace existing ephemeral pond/ wet depression in the north-west corner of Chestnuts Field;
 - Areas of wildflower grassland around the periphery of Chestnuts Field (including raised bank on the south eastern boundary of Chestnuts Field and the eastern boundary of Chestnuts Field);
 - Improvements to the watercourse along the northern boundary of Chestnuts Field to make it more attractive to visitors and providing biodiversity enhancements;
 - Provision of plants beneficial to pollinators, particularly within the formal gardens to the south of the Site; and
 - Pockets or stepping-stones of biodiverse habitats within the built development footprint to link up the northern Chestnuts Field and the southern formal gardens, as well as private and semi-private gardens for residents.
 - Provision of bat and bird boxes within the development, and invertebrate boxes and wood piles;

- Improved waymarking and interpretation boards will be included alongside the walking route, utilising QR codes to allow information to be updated regularly. The purpose of these will be to sign people around the walking route and out towards Lloyd Park, and to inform and educate local residents as to the wildlife provision being offered and the species that may be present locally; and
- Features to make the walking provision attractive to dog-walkers, including the provision of dog waste bins, benches, use of a year-round surface (as described above) and availability of the permanently wet SUDs basins (c.30cm deep which could be used by dogs).

10.338. A SANG Management and Maintenance Plan prepared by Stantec provides an overview of proposed habitat creation and management measures within the SANG area, forming an overarching structure for implementation and management of habitat and landscape features across the site. The document details the overall management strategy for the SANG, as well as setting out the mechanism for management and responsible bodies. For each of the respective habitat components, this plan identifies specific management prescriptions, along with specific faunal measures. Indicative costings are also provided. Once implemented, this SANG Management and Maintenance Plan will ensure the provision of the SANG for new and local residents for their use in perpetuity which will be secured by s.106 legal agreement.

10.339. This approach has been agreed with Natural England who have since removed their initial holding objection. The SANG and SAMM measures outlined in the Epping Forest SAC Mitigation Strategy document (dated July 2021; produced by Stantec and Gross Max) will be secured by s.106 legal agreement with contributions of £227,325 and £43,300, respectively.

Urban Greening Factor

10.340. Policies GG1, G1, and G5 of the London Plan (2021) require new development to incorporate urban greening features such as street trees, green roofs, green walls, raingardens, and nature-based sustainable drainage.

10.341. As set out in the GLA Stage 1 report, the proposed development takes a very well-considered approach to integrating green infrastructure within the proposed development, and designing for biodiversity, which is strongly supported.

10.342. The proposed development would retain a considerable proportion of the existing trees on and around the site. The proposed development would result in the loss of 34 trees and 4 groups of trees and 1 hedge are to be removed with 52 trees retained and 230 new trees are proposed and there would therefore be a substantial increase in tree cover across the site. 2 no. Category A trees are proposed for removal.

10.343. As such, the site achieves an UGF of 0.53 which exceeds the policy requirements of the Policies GG1, G1 and G5 of the London Plan (2021) and is considered acceptable.

N. SUSTAINABLE DESIGN AND ENERGY EFFICIENCY

10.344. The NPPF (2021) establishes a presumption in favour of sustainable development. It encourages proposals, which support renewable and low carbon energy and associated infrastructure. It further states that, in determining planning applications, LPAs should expect new development to comply with any development plan policies on local requirements for decentralised energy supply unless it can be demonstrated that it is not feasible or viable; and take account of landform, layout, building orientation,

massing and landscaping to minimise energy consumption. The NPPF (2019) also encourages LPAs to adopt proactive strategies to mitigate and adapt to climate change.

10.345. Policy SI2 of the London Plan (2021) sets out a carbon dioxide reduction target for regulated emissions only of 40% against Building Regulations 2010 and 35% against Building Regulations 2013. This policy also requires major developments to be net zero-carbon. This means reducing greenhouse gas emissions in operation and minimising both annual and peak energy demand in accordance with the following energy hierarchy:

- Be lean: use less energy and manage demand during operation.
- Be clean: exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly.
- Be green: maximise opportunities for renewable energy by producing, storing, and using renewable energy on-site.
- Be seen: monitor, verify and report on energy performance.

10.346. Policy SI3 of the London Plan (2021) states *‘where a heat network is planned but not yet in existence the development should be designed to allow for the cost-effective connection at a later date’*.

10.347. Policy CS4 of the Waltham Forest Local Plan Core Strategy (2012) requires new developments to minimise carbon emissions in accordance with the London Plan (2016) energy hierarchy and requires developers to investigate opportunities for linking into existing or proposed decentralised energy networks. The policy also requires developments to be designed in a manner that minimises the use of water.

10.348. Policy DM7 of the Waltham Forest Local Plan Development Management Policies (2013) states that all major developments are required to be designed to be able to connect to a Decentralised Energy Network (DEN)’.

10.349. Policy DM10 of the Waltham Forest Local Plan Development Management Policies (2013) seeks to secure sustainable management and high environmental standards by requiring development to be designed to achieve the Council’s stepped targets towards zero-carbon, in accordance with the London Plan (2016).

10.350. Policy DM11(A) of the Waltham Forest Local Plan Development Management Policies (2013) states ‘Requiring development of one or more units or greater than 100sqm located in the proximity of an existing or committed future Decentralised Energy Network to assess opportunities for, and to implement links into, existing or future committed decentralised energy networks, unless it can be demonstrated that an efficient connection is not feasible in accordance with the following thresholds;

- Development of one or more units or greater than 100sqm located within 200m of an existing or committed future Decentralised Energy Network,
- Major development located within 500m of an existing or committed future Decentralised Energy Network, and
- Development of more than 50 units located within 1000m of an existing or committed future Decentralised Energy Network.

10.351. Policy DM34 of the Waltham Forest Local Plan Development Management Policies (2013) states that residential development proposals should implement water efficiency measures to achieve usage of less than or equal to 105 litres per person per day.

- 10.352. The application is accompanied by an Energy Statement prepared by AECOM limited and Sustainability Statement prepared by Countryside. The Council's Energy and Sustainability Officer (ESO) advised that the proposal would deliver buildings using SAP10 carbon factors a reduction exceeding the target in regulated emissions, site wide, against Part L 2013 baseline. Based on SAP2012 figures, the development is expected to achieve 44% saving overall.

Carbon Emissions

- 10.353. The London Plan (2021) sets out a CO2 reduction target, for regulated emissions only, of 40% against Building Regulations. The development is predicted to achieve a reduction of 61% in regulated emissions, site-wide, against a Part L baseline. This well exceeds the London Plan (2021) target of 35%.
- 10.354. At the local level and in more detail, Waltham Forest currently require an on-site emissions reduction of 35% for non-residential developments. The non-residential element of the proposal would achieve an on-site reduction of 42% whilst the residential element achieves 63% using SAP10 factors and 33% and 47% using SAP2021 respectively.
- 10.355. The Energy and Sustainability Strategy indicates a total carbon offset contribution of £543,507 to achieve 100% reduction for the proposed development to be secured by s.106 legal agreement.

Sustainable design

- 10.356. GLA Sustainable Design and Construction SPG sets out the sustainable design principles are integral to proposals including construction and operation and must be incorporated from the beginning of the design process.
- 10.357. WFLP Development Management Policies (2013) Policy DM10 requires non-residential development greater than 100sqm to achieve BREEAM 'very good' or equivalent standards and encouraging major non-residential developments to achieve BREEAM 'excellent' or equivalent.
- 10.358. A BREEAM pre-assessment (new Construction 2018, Shell & Core) has been carried out for the non-residential element (Civic Building) of the development. This is predicted to achieve a BREEAM 'Very Good' rating, with an anticipated score of 60.5%, based on targeted credits alone. This is a fair margin of comfort over the 55% threshold for a 'Very Good' rating. Other potential credits are also identified. It is recommended that these credits are targeted wherever possible in order to ensure a 'Very Good' rating is achieved. It is noted that the commercial and nursery elements have not been assessed for BREEAM and it is understood the fit-out of these spaces will be undertaken by the future operators. Details of compliance will be secured by condition subject to planning approval.

Energy – Demand Reduction (Be Lean) and Overheating

- 10.359. Policy SI4 of the London Plan (2021) seeks all developments to reduce the urban heat island effect and encourage the design of places to avoid overheating and excessive heat generation. Policy SI4 of the London Plan (2021) requires development proposals to minimise adverse impact on the urban heat island through design, layout, orientation, materials, and the incorporation of green infrastructure. WFLP Development Management Policies (2013) Policy DM10 requires new developments to be designed with regard to sustainable principles.

- 10.360. The Energy and Sustainability Statement confirms that the demand reduction measures deliver a 12% saving against the baseline for the entire development, with a 11% saving for the residential element and a saving of 15% for the non-residential element, as indicated by the submitted SAP10 figures. As such, the non-residential element achieves the GLA's target of 15% energy efficiency savings and the residential elements also exceeds the 10% target.
- 10.361. With regards to air permeability, the development proposes 3.0m³/m²/hr for the residential element and for the commercial and nursery areas. As advised by the Council's Energy and Sustainability Consultant, the air permeability values are accepted. In addition, the proposed U-values are considered of a relatively good standard and the proposed approach to lighting and lighting controls is acceptable.
- 10.362. The proposed approach to the cooling hierarchy includes minimisation of avoidable heat gains from lighting and equipment, building fabric and thermal mass, external shading and glazing, and removal of heat via natural and mechanical ventilation. Council's Energy and Sustainability Officer is broadly satisfied with this proposed approach to lighting and lighting controls with both occupancy and daylight control proposed in the relevant area of the non-residential elements. The applicant has sought to address the cooling hierarchy in terms of passive measures and natural and mechanical ventilation.
- 10.363. TM52 and TM59 thermal modelling has been undertaken for both the residential and commercial elements. All the assumptions underlying this modelling are considered to be reasonable, and all the areas assessed under TM59 passed the overheating criteria under DSY1 conditions – moderately warm summer, with a return period of seven years. It advised that blinds are included within the build specifications and should be secured by condition subject to planning approval.
- 10.364. For the non-residential elements, glazing is the main point addressed within the lower levels of the cooling hierarchy.
- 10.365. As such, subject to conditions, the proposed development would be consistent with Policies SI4 of the London Plan (2021) and Policy DM10 of the WFLP Development Management Policies (2013).

Energy - Low Carbon Supply (Be Clean)

- 10.366. Policy SI3 of the London Plan (2021) states that major development proposals should select energy systems in accordance with the following hierarchy:
- Connection to existing heating or cooling networks;
 - Site wide CHP network; and
 - Communal heating and cooling.
- 10.367. The development would provide heating and hot water via a communal heating system for the residential blocks including blocks D and J which have commercial elements served by an energy centre within Block C. The network itself would be air-source heat pump-led providing 75% of the head demand with the remaining 20% from gas boiler and 5% from top up electric heating to domestic hot water.
- 10.368. In terms of gas boiler top-up, the Council's ESO queried whether consideration has been given for connection to the existing Town Hall system. This could potentially provide the required additional heat, while also facilitating a connection / integrating the

Town Hall into a wider low-carbon system. This could be further investigated by the imposition of a condition.

- 10.369. For the new Civic building, it is proposed that heating and cooling would be provided via air source heat pumps separate from the communal system with direct electric hot water heating. It is recommended by the Council's ESO that further consideration be secured by condition to whether the development might be served by a single communal network (i.e., one which includes the civic building) and, whether an oversized energy centre, capable of serving a wider local network, could be incorporated. This could include the potential to support the nearby Waltham Forest college or YMCA, which had previously been identified as possible network connections.
- 10.370. As such, subject to condition to secure further investigations relating to communal heating possibilities, the proposal is considered in accordance with the requirements of the Policy SI3 of the London Plan (2021).

District Heating and Cooling Networks

- 10.371. Policy SI3 of the London Plan (2021) set out the policy for decentralised energy within development proposals. This policy also requires district heating systems are designed to meet relevant criteria. The development has been designed with regard to the London Plan London Heat Network Manual (2014).
- 10.372. WFLP DM (2013) Policy DM11 states "*A) Requiring development of one or more units or greater than 100sqm located in the proximity of an existing or committed future Decentralised Energy Network to assess opportunities for, and to implement links into, existing or future committed decentralised energy networks, unless it can be demonstrated that an efficient connection is not feasible in accordance with the following thresholds;*
- *development of one or more units or greater than 100sqm located within*
 - *200m of an existing or committed future Decentralised Energy Network,*
 - *major development located within 500m of an existing or committed future Decentralised Energy Network,*
 - *and development of more than 50 units located within 1000m of an existing or committed future Decentralised Energy Network;*
- 10.373. The applicant does not intend to connect to the proposed Upper Lea Valley heat network, as this is not a committed network. The Marlowe Road Heat Network sits within 1000m of the development. However, this is still around 800m away, and given this distance, the development's heat demand, and likely capacity constraints on the network, a connection is not currently considered realistic. Therefore, it is accepted that the development will not make an immediate connection to a network.
- 10.374. In terms of site wide communal systems/network and design for district network connection, the energy statement set out that the development will be future-proofed for connection to a wider area heat network. To this end, the applicant has provided drawings showing reserved space for future heat exchangers within the main ground floor plant room and designated DE pipework routes through the development. Notwithstanding this, further information should be provided in terms of heating system schematics including connection points, and further information on anticipated flow and return temperatures secured by condition subject to planning. As such, subject to conditions, it is considered acceptable in accordance with Policy SI3 of the London Plan

(2021), which states that “where future network opportunities are identified, proposals should be designed to connect to these networks.

- 10.375. In terms of shared energy networks, the Council's ESO advises that the possibility of connecting to a shared heat network has not been assessed. However, a greater priority would be for the development to form part of a wider future local heat network so there is no requirement in this regard in accordance with Policy SI1 of the London Plan (2021) states “Development proposals should evaluate the feasibility of Combined Heat and Power (CHP) systems, and where a new CHP system is appropriate also examine opportunities to extend the system beyond the site boundary to adjacent sites.
- 10.376. Given that a connection to a district heating system or cooling network is not viable in this instance, Policy DM11 of the WFLP Development Management Policies (2013) requires developments to demonstrate that the connection to an existing or committed decentralised network is not feasible and to implement a Combined Heat and Power Plant (CHP), unless it can be demonstrated that an efficient connection is not feasible. The development does not propose an onsite CHP, by reason of its poor carbon performance when using SAP10 factors. Given that the development is not creating a strategically significant heat network, the decision to not use on-site CHP systems is accepted.

Energy - Renewable Energy (Be Green)

- 10.377. Policy SI2 of the London Plan (2021) and Policy DM11 of the WFLP Development Management Policies (2013) states that major development should seek to reduce the site's carbon emissions through on-site renewable energy, to ensure that the proposed renewable system is appropriate to the location and does not significantly adversely affect the development, or local amenity of neighbourhoods, and the environment, including air quality.
- 10.378. The primary source of the proposed energy supply is from Air Source Heat Pumps which are a renewable source of energy and are expected to deliver a high percentage of the site's energy needs.
- 10.379. The applicant has confirmed that a total area of 2,639m² of solar PV is proposed which covers a large area of the roof is supported. The anticipated output of 595kWp and an area of 2,639sqm. 80% of on-site energy demand is met by renewables when considering both the proposed PV and air source heat pumps. Given the development is exceeding its carbon targets, this can be accepted.

Whole Life-Cycle Carbon Emissions

- 10.380. Policy SI2(F) of the London Plan (2021) states that “Development proposals preferable to the Mayor should calculate whole lifecycle carbon emissions through a nationally recognised Whole Life-Cycle Carbon Assessment and demonstrate actions taken to reduce life-cycle carbon emissions.
- 10.381. A Whole Life Carbon Assessment and Circular Economy documents prepared by AECOM have been submitted with the application. This is based on an assumed 60 year lifespan for the development, and estimates whole life emissions as 5,568tCO₂e based on SAP10.1 carbon factors. The Council's ESO recommends that this is acceptable subject to a condition to ensure whole life-cycle carbon is calculated and reduced and to demonstrate compliance with Policy SI2 of the London Plan.

Water Efficiency

- 10.382. Policy SI5 of the London Plan (2021) require new developments to demonstrate how it will achieve a water consumption of less than 105l/person/day. The non-residential components should achieve the equivalent of an 'Very Good' rating on the water elements for BREEAM. Water reuse should be considered for inclusion in the development to meet both water efficiency and sustainable drainage requirements.
- 10.383. WFLP Development Management Policies (2013) DM34(c) states that development proposals should:
- Implement water efficiency measures to achieve usage of less than or equal to 105 litres/person/day for residential developments.
 - Incorporate water saving measures and equipment for any new development of greater than 100sqm.
- 10.384. The applicant has provided water calculations to demonstrate that the domestic properties would achieve a water usage below the Waltham Forest policy target of 105 l / person / day and information on the water specification has been provided; and the non-residential units would consume 50% less potable water than a conventional scheme in line with the recommendation of BREEAM 'Very Good' Standard.
- 10.385. A condition requiring details of how water consumption will be restricted would be imposed subject to planning approval approved.
- 10.386. As such, subject to condition, the proposal is considered to accord with Policy DM34 WFLP Development Management and Policy S15 of the London Plan (2021).

O. ENVIRONMENTAL IMPACT

- 10.387. Policy DM24 seeks to control and mitigate pollution in all its forms including noise (and vibration), light, smell as well as land, water and air based. The Council's Environmental Health team have assessed the proposed development and their conclusions and recommended conditions are set out below.

Noise and Vibration

- 10.388. Policies D1 and D1B of the London Plan (2021) expect new developments to design out exposure to poor air quality and noise from both internal and external sources.
- 10.389. Policy D13 of the London Plan (2021) states development proposals should manage noise and other potential nuisances by:
- 1) 1) ensuring good design mitigates and minimises existing and potential nuisances generated by existing uses and activities located in the area
 - 2) 2) exploring mitigation measures early in the design stage, with necessary and appropriate provisions including ongoing and future management of mitigation measures secured through planning obligations
 - 3) 3) separating new noise-sensitive development where possible from existing noise-generating businesses and uses through distance, screening, internal layout, sound-proofing, insulation, and other acoustic design measures.
- 10.390. Policy D14 of the London Plan (2021) states that noise impacts should be reduced, managed, and mitigated. In particular, it notes that developments should use distance and layout, as well as other design measures, to separate noise-sensitive development from major noise sources.

- 10.391. Policy DM24 of the WFLP DM Policies (2013) states that all major developments should aim to minimise the adverse impacts of noise through sensitive design, management, and operation.
- 10.392. A Noise Impact Assessment prepared by Stantec accompanies the application and sets out the methodology and results of attended and unattended sound surveys undertaken on 15 October to 22 October 2020 in order to determine the existing sound climate at locations considered representative of site and locations considered representative of sound levels incident on the future development.
- 10.393. Noise levels were assessed against noise from the Assembly Hall in particular and site suitability and proposed use. It is advised by Stantec that future use of the Assembly Hall and the proposed residential component would have to be carefully managed to ensure low frequency sound levels are limited. These would align with a number of mitigation measures to ensure sound levels are controlled.
- 10.394. The resultant noise levels have been used in the assessment of the glazing requirements to ensure suitable internal noise levels are achieved at the proposed development with reference to BS 8233 and World Health Organisation guidelines. It is considered that internal noise levels can be effectively controlled by simple double-glazing configurations overall. General guidance configurations have been suggested for the glazing constructions that should be capable of achieving the required specifications detailed.
- 10.395. The Council's Noise Officer raises no objection subject to carefully worded conditions requiring; construction/demolition method statement; details of noise mitigation measures; noise levels controlled from plant; sound insulation between residential and commercial; transportation noise; lighting scheme near residential property. With these conditions in place, it is considered that the proposed development would not have an unduly adverse impact on new and existing receptors.
- 10.396. Noise and vibration created during construction will be mitigated through the implementation of a range of best practices. There may be some short-term adverse effects to the closest residents caused by piling. The applicant is required to engage with residents as part of the Construction Environmental Management Plan (CEMP).
- 10.397. As such, subject to conditions, it is considered that the proposed development accords with Policy DM24 of the WFLP DM Policies (2013) and Policies D1, D1B, D13 and D14 of the London Plan (2021).

Air Quality

- 10.398. Paragraph 170 of the NPPF seeks to prevent new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of air pollution.
- 10.399. The London Plan and the Mayor's Air quality Strategy (2010) seeks to minimise the emissions of key pollutants and to reduce concentrations to levels at which no, or minimal effects on human health are likely to occur.
- 10.400. Policy SI1 of the London Plan (2021) sets out the requirement for new developments to tackle poor air quality. All new developments must be at least air quality neutral.

- 10.401. Policy 90 of the emerging WFLP (2020) sets out that major developments which are not air quality neutral would be expected to make a financial contribution.
- 10.402. Policy CS4 and WFLP Core Strategy (2012) states that Council will tackle climate change locally and promote resource efficiency and high environmental development standards during design, construction, and occupation of new developments by reduction of carbon emission.
- 10.403. Policy CS13 and WFLP Core Strategy (2012) states that the Council will aim to create and develop healthy and sustainable places and communities and require all new developments to meet appropriate environmental standards that minimise air, water, noise and light pollution and address the risks arising from contaminated land and
- 10.404. Policy DM24 of the WFLP DM Policies (2013) states that new developments should neither contribute to, nor suffer from unacceptable levels of air pollution. On major applications, this should be demonstrated through an Air Quality Assessment and, if necessary, proposed mitigation measures.
- 10.405. In the London Borough of Waltham Forest, a borough wide air quality management area (AQMA) has been declared.
- 10.406. The application is accompanied by an air quality report prepared by Stantec and concludes that the development is considered 'Air Quality Neutral' in terms of transport emission as it is 51% less than benchmarked emissions for the Outer London Zone within London. The development is also 98ss?? than benchmarked building emissions and therefore is compliant with the air quality neutral requirements of the London Plan.
- 10.407. The Proposed Development will produce fewer vehicle trips than the current development, and therefore falls below EPUK/IAQM screening criteria and will have a beneficial effect on air quality. Furthermore, concentrations of NO₂, PM₁₀, and PM_{2.5} within the proposed development are predicted to be well below the relevant NAQOs. As such, new residents will experience acceptable air quality and thus the site is considered to be suitable for the proposed use, and as per the relevant requirements of the NPPF, the site is considered suitable for the proposed development.
- 10.408. Whilst mitigate are not required in this instance, additional transport related mitigation measures in the form of a travel plan and electric vehicle charging provision will be employed to reduce emissions from the development.
- 10.409. As such, the scheme has demonstrated that it meets adopted and draft planning policy with regard to being air quality neutral. Notwithstanding this, the site falls within a AQMA and the development is in an area of high relative exposure as per the Air Quality Action Plan (AQAP) for the locale. The demolition/construction phase would have an impact on the local environment through fugitive dust and exhaust emissions and therefore a financial contribution towards AQAP is required. This will be secured by s.106 legal agreement subject to planning approval.
- 10.410. The Air Quality Neutral Assessment prepared by Stantec has been assessed by the Council's Nosie officer and found this to be satisfactory subject to conditions ensuring compliance with AQA and AQNA, emissions from Non-Road Mobile Machinery (NRMM); and Air Quality and Dust Management Plan and securing contributions of £87,680 towards the Air Quality Action Plan via a s.106 legal agreement.
- 10.411. An Outline Construction Environmental Management Plan (CEMP) prepared by Countryside has been submitted in support of the planning application which outlines

the overarching details and principles to minimise, manage and/or mitigate the environmental effects of the works associated with the development of the former gasworks. The CEMP details the environmental management, controls, and safety procedures that will need to be adopted during the development of the site.

10.412. A detailed Construction Environmental Management Plan will be secured by condition subject to planning approval.

10.413. As such, subject to conditions, it is considered that the proposal complies with London Plan Policy SI1, and WFLP Core Strategy Policies CS4 and CS13 and the WFLP Development Management Policies (2013) Policy DM24.

Contaminated Land

10.414. Paragraphs 178 and 179 of the National Planning Policy Framework are clear that planning decisions should ensure that:

- a) *a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination. This includes risks arising from natural hazards or former activities such as mining, and any proposals for mitigation including land remediation (as well as potential impacts on the natural environment arising from that remediation);*
- b) *after remediation, as a minimum, land should not be capable of being determined as contaminated land under Part IIA of the Environmental Protection Act 1990; and*
- c) *adequate site investigation information, prepared by a competent person, is available to inform these assessments.*

Where a site is affected by contamination or land stability issues, responsibility for securing a safe development rests with the developer and/or landowner.'

10.415. Policy SD1 at criteria A, 8 of the London Plan (2021) states to ensure that Opportunity Areas fully realise their growth and regeneration potential, the Mayor will take appropriate measures to deal with contamination that may exist.

10.416. Policy CS13 of the Waltham Forest Local Plan Core Strategy (2012) sets out that the Council will aim to create and develop health and sustainable places and communities and developments are required to meet appropriate standards that address the risks arising from contaminated land and hazardous substances.

10.417. Policy 92 of the emerging WFLP requires development that has the potential to contaminate land, or which is situated in close proximity to sensitive receptors to include mitigation measures to prevent any adverse impacts on people and the environment, and to monitor any impacts where appropriate

10.418. Policy DM24 of the WFLP Development Management Policies (2013) states that for sites which are potentially contaminated, planning permission will be subject to conditions to ensure the final development is fit for the proposed end use. Policy DM24 also sets out that developers should identify risks to water quality posed by the development and agree a strategy to overcome any risk.

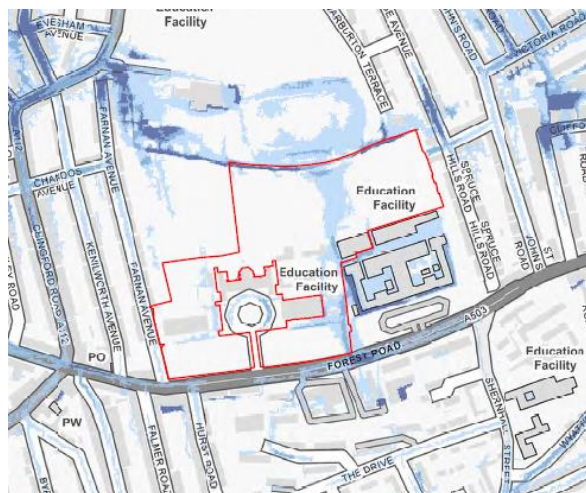
10.419. A Phase 2 Investigation Report prepared by Ground Engineering accompanies the planning application. It is noted that a phase 1 desk study had already been undertaken in September 2017. The report recommends that a remediation strategy is developed following a brief contamination assessment of the site. To this end, the Council's Contaminated Land Officer has requested conditions relating to asbestos and

contamination requiring further site investigations, remediation, verification to be submitted and agreed to ensure the risks from land contamination to future users of the land and neighbouring land are minimised.

- 10.420. As such, subject to conditions, it is considered that the proposals accord with Policy SD1 of the London Plan (2021), Policy CS13 of the Waltham Forest Local Plan Core Strategy (2012) and Policy DM24 of the Waltham Forest Local Plan Development Management Policies (2013).

Flood Risk

- 10.421. The NPPF (paragraph 155) states that inappropriate development in areas of flood risk should be avoided. Where development is necessary, such development should be made safe across its lifetime without increasing flooding risk elsewhere.
- 10.422. Policy SI12 of the London Plan (2021) requires developments size larger than 1 hectare to submit a Flood Risk Assessment and ensure that flood risk is minimised and mitigated, and that residual risk is addressed.
- 10.423. Policy 93 of the emerging WFLP requires a flood risk assessment (FRAs) to be undertaken for sites greater than 1 hectare in Flood Zone 1 and / or has critical drainage issues.
- 10.424. The GLA's Sustainable Design and Construction SPG, the Strategic Flood Risk Assessment and the Councils Local Flood Risk Management Strategy are relevant.
- 10.425. The emerging WFLP Local Plan Part 1 (2020) (Reg 19) and Local Plan 2: Site Allocation Document (2020) (Reg18) identify this site and adjoining sites as suitable for delivering a minimum of 450 new residential dwellings and non-residential floorspace to include nursery / creche, new open space, office space.
- 10.426. Over 15% of the borough either lies within Flood Zone 2 or 3 or is known to have surface water drainage issues. The FRA at para. 5.2.2 – 5.2.4 states that... *“According to the online Flood Map for Planning the site is located within Flood Zone 1 (defined as having a ‘Low’ probability of flooding from the rivers and sea). PPG Table 2 confirms the ‘Flood Risk Vulnerability Classification’ of a site, depending on the proposed usage. The classification is subsequently applied to PPG Table 3 to determine:*
- *Whether the proposed development is suitable for the flood zone in which is located;*
 - *Whether an Exception Test is required for the proposed development.*
- 10.427. *For the purposes of this assessment, the proposals for mixed development fall within the ‘More Vulnerable’ uses which are considered appropriate for Flood Zone 1 without the need to apply the Sequential or Exceptions Test. Therefore, the proposals for residential development are appropriate at this location.”*
- 10.428. The site measures well over 1 hectare in area and part of the site towards the NE boundary lies within a Critical Drainage Area (CDA) – the Chestnuts Showground. Whilst the probability of flooding is low to extremely low of surface flooding, the potential impacts of climate change must be mitigated where possible. As depicted in the below image, the site does have some low surface water flood risk whilst being in Flood Zone 1 - low risk (0.1% 1- 1000yrs) annual probability of flooding.



- 10.429. The application is accompanied by an FRA prepared by Stantec UK Limited which reports *“that the FFLs of the proposed buildings in the areas at a ‘Low’ and ‘Medium’ susceptibility to surface water flooding will be generally set above the existing ground levels. The proposed building accesses will be set to fall towards the access roads/open spaces away from the building. The proposed access roads and open spaces will channel any surface water flooding via exceedance routes towards the low-lying Chestnut Fields. Furthermore, as it is good practice linear threshold drains will be provided across all access thresholds of the proposed development.”*
- 10.430. Officers recognise that there are limited brownfields sites with the capacity for the proposed development in areas with a lower risk of flooding within the borough. Large areas of Waltham Forest are located within Flood Zone 1, albeit the west of the borough is dominated by the Lea Valley and there are extensive areas within Flood Zones 2 and 3. This is a key growth corridor area so residential development must be designed to appropriately address flood risk matters.
- 10.431. The Environment Agency (EA) advises that the site does not have any environmental constraints that fall within their remit as a statutory consultee and therefore raise no objection.
- 10.432. The LLFA advise that given the flood risk to and CDA of the site and surrounding streets in particular Sturges Avenue and Spruce Hills Road, there is a need for the Council’s proposed flood mitigation scheme within Chestnuts Field to be implemented. In this regard, a partnership funding is required to help deliver the flood mitigation project with a contribution of £150,000 secured by s.106.
- 10.433. The wider aims are to integrate delivery of the proposed flood mitigation project into the Fellowship Sq. development proposals and phased construction delivery programme with works potentially starting in either Autumn of 2022 or Spring of 2023.
- 10.434. As such, subject to conditions, and securing contributions, the approach to flood risk management for the proposed development complies with Policy SI.12 of the London Plan (2021). As such, it is considered that the application is acceptable and meets the policy requirements of the London Plan (2021) Policy SI 12, WFLP Core Strategy Policy CS5, and WFLP Development Management Policy DM34.

Sustainable Urban Drainage

- 10.435. Policy SI13 of the London Plan (2021) require new developments to utilise sustainable urban drainage systems (SUDS) to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible in line with the drainage hierarchy.
- 10.436. Policy C5 of the WFLP Core Strategy states that the Council will endeavour to protect and enhance green infrastructure and biodiversity and to maximise access to open spaces across the Borough.
- 10.437. Policy DM34 of the adopted WFLP states that flood risk should be managed and maximise sustainable urban drainage systems where possible.
- 10.438. The development should utilise SuDS and all opportunities must be explored. Potential SuDS features for this site include permeable paving using voided stone sub-base or modular storage cells, water butts, rain gardens, soakaways, that must be designed together with infiltration test results and recommended soakage rates where soil conditions are suitable for infiltration. The use of blue, green, and brown roofs should be considered and the potential for the inclusion of rainwater harvesting systems should be assessed. SuDS features included within the drainage design should be fully justified by adopting techniques in a hierarchical manner, maximising the use of those techniques higher up the hierarchy and those that deliver multi-functional benefits (GLA's Sustainable Design and Construction SPG). The applicant should demonstrate that the requirements of table 3.1 of the SPG documents have been considered.
- 10.439. The application is accompanied by a drainage strategy as set out in section 6 of the FRA prepared by Stantec UK Limited which reports that the discharge rates from the site would be restricted to greenfield runoff rate of Q_{bar} , 4.6l/s/ha up to and including the 1% Annual Probability event, plus climate change. Over a 30 year period, this equates to 26.2 l/s. The existing brownfield runoff rate is 242.3 l/s. So, this represents a marked improvement on the current drainage efficiency. The surface water management strategy will incorporate SuDS measures such as green roofs, permeable paving, water butts, tree pit attenuation cells, swales, and a hybrid pond to provide water quality, biodiversity, amenity, and surface water attenuation benefits. The proposed hybrid pond has been designed to serve only the proposed development and its layout and invert level is suitable to allow a connection from the wetlands proposed by the LBWF. If such a connection is to be implemented, then the design of the hybrid pond is to be reviewed in conjunction with that of LBWF's wetlands.
- 10.440. The LLFA give their support for the mix of soft SuDS features provided within the proposed development.
- 10.441. There would not be infiltration into ground due to ground and ground water conditions. The LLFA raise no objection to this approach. The drainage strategy along with the associated drawings will be secured by condition to be reviewed by the LLFA subject to planning approval.
- 10.442. As such, subject to conditions, it is considered that the proposed development accords with Policy CS5 of the WFLP Core Strategy, Policy DM34 of the WFLP Development Management, and Policy SI13 of the London Plan (2021).

Archaeology (Buried Heritage)

- 10.443. Paragraph 194 of the NPPF requires applicants to provide an archaeological assessment if their development could affect a heritage asset or archaeological interest.

- 10.444. Policy HC1 of the London Plan (2021) states at criterion (d) that development proposals should identify assets of archaeological significance and use this information to avoid harm or minimise it through design and appropriate mitigation. Where applicable, development should make provision for the protection of significant archaeological assets and landscapes. The protection of undesignated heritage assets of archaeological interest equivalent to a scheduled monument should be given equivalent weight to designated heritage assets.
- 10.445. Policy DM22, criterion (g) of the Waltham Forest Local Plan states that the Council will ensure the preservation, protection and where possible the enhancement of the archaeological heritage of the borough. Where proposals affect heritage assets of archaeological interest, preference will be given to preservation in situ. However, where loss of the asset is justified in accordance with national policy, the remains should be appropriately recorded, assessed, analysed, disseminated and the archive deposited
- 10.446. The application is supported by an Archaeological Desk Based Assessment prepared by Orion Heritage Ltd. As part of their assessment of the merits of the application and the Environmental Impact Assessment that forms part of this wider report, they recorded no known archaeological remains within the application site boundary. To this end, the site does not lie within or adjacent to an Archaeological Priority Area (APZ). The potential for previously recorded below ground archaeological sites is considered to be low potential for significant remains of all period. This is emphasised that the site's location away from known post medieval farmstead Clay Street Farm / Chestnut Farm. It is accepted that truncated / isolated post medieval landscape feature cannot be ruled out entirely, and they were to be found such remains would be of limited, local significance. In summary, Orion Heritage provided an assessment that has not identified any designated assets which will be negatively impacted by the proposed development.
- 10.447. As part of statutory consultation, Greater London Archaeological Advisory Service (GLAAS) were consulted due to the site measuring over 0.5ha in area. Whilst they acknowledge the site is not within a APZ, they commented that the site does fall within an area of archaeological interest particularly long Forest Road where there are records of medieval settlement. For these reasons, GLAAS advise that field evaluation is needed to determine appropriate mitigation should remains be found.
- 10.448. As such, it is considered that a condition be imposed to secure an archaeological field evaluation involving exploratory fieldwork to determine if significant remains are present on a site and if so to define their character, extent, quality and preservation in accordance with paragraph 89 of the Policy CS12 of the WFLP Core Strategy (2012) and Policy DM28 of the WFLP Development Management Policies (2013), Policy 75 of the Emerging WFLP, Policy HC1 of the London Plan (2021) and the NPPF,

P. SAFETY AND SECURITY

Fire Safety

- 10.449. The London Plan (2021) Policy D12 'Fire Safety' states that all major development proposals should be accompanied by a Fire Statement in the interests of fire safety and to ensure the safety of all building users, all development proposals. In order to achieve the highest standards of fire safety proposal must ensure that they:
- 1) identify suitably positioned unobstructed outside space: a) for fire appliances to be positioned on b) appropriate for use as an evacuation assembly point;

- 2) are designed to incorporate appropriate features which reduce the risk to life and the risk of serious injury in the event of a fire; including appropriate fire alarm systems and passive and active fire safety measures ;
- 3) are constructed in an appropriate way to minimise the risk of fire spread
- 4) provide suitable and convenient means of escape, and associated evacuation strategy for all building users;
- 5) develop a robust strategy for evacuation which can be periodically updated and published, and which all building users can have confidence in;
- 6) provide suitable access and equipment for firefighting which is appropriate for the size and use of the development.

10.450. As per criterion B of policy D12, the Fire Statement should be produced by a third-party, independent, and suitably qualified assessor. This should be a qualified engineer with relevant experience in fire safety, such as a chartered engineer registered with the Engineering Council by the Institution of Fire Engineers. Planning departments should work with and be assisted by suitably qualified and experienced officers within borough Building Control departments and/or the London Fire Brigade, in the evaluation of these statements.

10.451. The submitted Outline Fire Strategy prepared by suitably qualified Ashton Fire, has been revised during the planning process following the GLA stage 1 report. The revised strategy ref: Issue 02 dated 21 July 2021 includes reference to the London Plan (2021) policy context (D12) and addresses initial policy omission and application. These include active fire safety systems, means of warning and escape, passive fire protection systems, external fire spread, and access, and facilities for fires and rescue service. These include automatic fire detection and alarm, natural and automatic smoke shafts, emergency signage and lighting, structural fire resistance that is appropriate for building height , British Standard sprinkler suppression system, prevention of internal and external fire spread (having regard to latest Government guidance e.g. for balcony materials), fire service access and provision (including hydrants and wet and dry risers) and secondary power requirement (to ensure fire protection systems, such as sprinklers are maintained).

10.452. The GLA and the London Fire Brigade (LFB) have reviewed the proposals and the accompanying Outline Fire Safety report prepared by Aston Fire and consider the scheme acceptable regarding firefighting access arrangements. However, the LFB request a condition to ensure compliance as block H is more problematic in that access is only available to town corners of the building.

10.453. As such, subject to condition, it is considered that the proposed development acceptable in accordance with London Plan (2021) Policy D12, and CS16 of WFLP Core Strategy (2012).

Crime Prevention

10.454. Policy D11 of the London Plan (2021) set out policy which requires all new developments to design out crime and incorporate an acceptable level of safety and security measures and ensure development is resilient to emergency.

10.455. Policy CS16 of the WFLP Core Strategy “Making Waltham Forest Safer” set out the Council’s aspirations to improve community safety and cohesion by working on minimising opportunities for criminal behaviour.

10.456. Policy DM33 of the WFLP DM Policies (2013) seeks a safe environment with appropriate levels of natural surveillance.

- 10.457. The Design and Access Statement prepared by Barton Willmore and the Security Needs Assessment prepared by Buro Happold accompany the planning application and sets out the proposed crime prevention measures and considers the scheme has been designed in accordance with Part Q of the Building Regulations (2015).
- 10.458. In consultation with the Met Police, Designing Out Crime Officers and Anti-Terrorism Security Advisor (CTSA) , they have set out a number of mitigation to further reduce opportunities for criminal activities and anti-social behaviour which the applicant's team has considered. The Met Police have raised concerns and objected, and the applicant have responded positively to mitigation made and provided justification relating to CTSA concerns and security proposals.
- 10.459. A number of security features and spatial requirements have been incorporated into the design of the scheme, including the design of the Civic Building The security strategy includes, but is not limited to:
- Pedestrian and vehicle access control
 - Hostile vehicle mitigation measures
 - Video surveillance
 - Intruder detection
 - Lighting
 - Security control facilities including access control particularly to the Civic Building, and
 - Identification of key threats and vulnerabilities.
- 10.460. In order to secure compliance, the inclusion of a 'Certificate of Compliance' to the relevant Secure by Design Guide condition will be imposed subject to planning approval to mitigate and secure necessary mitigations and delivery secure, safe environment for all users of the proposed development. The safety and security measures relate to active street frontages, active and passive surveillance, lighting, external CCTV, secure access points and other measures. These are outlined in the supporting assessments and subject to condition securing mitigations, are considered acceptable in accordance with Policy D11 of the London Plan (2021) and Policy DM33 of the WFLP DM Policies (2013).

11. THE ENVIRONMENTAL STATEMENT

- 11.1. The Environmental Statement (ES) has been prepared by Stantec in support of the planning application. Quod were instructed on behalf of the Local Planning Authority to undertake an independent review of the ES to confirm it is compliant with the requirements of the EIA Regulations.
- 11.2. The need for an EIA is determined by the definition and criteria provided in Schedule 1 or Schedule 2 and Schedule 3 of the EIA Regulations. The Development is of a type described in Schedule 2 (10b) of the EIA regulations. That is:
- 11.3. *"10. Infrastructure projects ... (b) urban development projects, including the construction of shopping centres, and car parking, sports stadiums, leisure centres and multiplex cinemas."*

Scope of the ES

- 11.4. Quod have confirmed that generally the scope of the ES is considered adequate and the ES has been undertaken in accordance with this narrative.

- 11.5. As part of the Independent Review of the ES, Quod and Stantec have discussed areas of the ES topics, which required clarifications on the submitted information.
- 11.6. The EIA Regulations require that, where the decision-maker is of the opinion that “further information” is needed for the document submitted as an ES to qualify as an adequate ES, such information must be publicised in a prescribed manner. The decision on the planning application is then delayed until consultees have had a period of time to respond to the additional information. This rule is applied through Regulation 25 of the EIA Regulations.
- 11.7. Upon careful consideration, the additional information were considered to be clarifications and further information which is directly relevant to reaching a reasoned conclusion on the likely significant effects of the development. As such, following trigger Regulation of the EIA Regulations Officers consider the further information provided in response to the ES clarifications can be dealt in conjunction with carrying out publicity requirements to formally reconsult for 30 days which ended on the 21st August 2021.

Outcome of the ES Review undertaken by Quod

- 11.8. Following a review of the ES as submitted, Quod requested a number of clarifications and further information request with regard to: Statement of Expertise; Site Description; Description of Development; Townscape, Heritage Value and Visual Effects;
- 11.9. The EIA Regulations require that, where the decision-maker is of the opinion that “further information” is needed for the document submitted as an ES to qualify as an adequate ES, such information must be publicised in a prescribed manner. The decision on the planning application is then delayed until consultees have had a period of time to respond to the additional information. This rule is applied through Regulation 25 of the EIA Regulations.
- 11.10. Upon careful consideration, the further information is considered to trigger regulation 25 as they information requested was not clarification only and directly relevant to reaching a reasoned conclusion on the likely significant effects of the development. As such, following reconsultation of 30 days enacted by Regulations 25 has been carried out. Officers consider the information provided in response to the ES further information have been duly consulted upon and the following paragraphs briefly describe the likely effects of the proposed development with regard to various topics, during the construction works and once the development is complete and operational.

Cumulative Schemes

- 11.11. A list of cumulative schemes has been agreed with officers and generally, the criteria for the cumulative schemes included within the cumulative effects assessment include the following:
- Are located within a 1km radius from the centre of the proposed development as this spatial extent is considered appropriate for determining cumulative effects in this locality;
 - Have full planning consent, a resolution to grant consent, or are applications that have been submitted but not yet determined;
 - Produce an uplift of more than 10,000sqm (GEA) of mixed-use floorspace), or over 150 residential units; and
 - Any office to residential conversions (granted under the General Permitted Development Order) giving rise to more than 150 residential units.

11.12. As such, the following cumulative schemes are considered within the EIA:

- Thorpe Coombe Hospital
- Phase 1 regeneration works at the Waltham Forest Town Hall Campus (Planning Ref: 192584);
- Block P5, P6 & P7 Marlowe Road Estate, Marlowe Road (Planning Ref: 200180)
- Ross Wyld Lodge Nursing Home 458 Forest Road (Planning Ref: 194037);
- Juniper House 221 Hoe Street (Planning Ref: 183989);
- Central House 189-203, Hoe Street (Planning Ref: 183632);
- Jane Atkinson Health and Wellbeing Centre, 714 Forest Road (Planning Ref: 141145);
- Marlowe Road Estate, Marlowe Road (Planning Ref: 151652); and
- Street Record Selborne Walk (Planning Ref: 171355).

11.13. The methodology has been independently reviewed by Quod on behalf of the Council and has been considered acceptable.

Alternatives

11.14. Chapter 4 of the ES, in line with best practice, sets out the alternatives to the proposed development. This includes considering a '*do nothing*' no development scenario; alternative sites; and alternative design.

11.15. The '*no development*' option was not considered in depth on the basis that considering the approved policy position (site allocation SA38) and the regenerative benefits of delivering the scheme clearly outweigh leaving the site as it currently is.

11.16. With regard to alternative designs, the proposed development remains materially consistent with the strategic and transformational aspirations of the site and its allocation. Key design changes from the initially designed scheme at the pre-application stage were iterative and resulted in some 8 design options in which option 8 was considered the 'preferred option'. The ES states reasons for which designs were considered unsuitable included impacts to the heritage setting of the Town Hall due to increased height and massing which were included to accommodate additional residential units. The options related to the varying the 'Type of Use'; 'Quantum of Development' and Layout and Massing.

11.17. The scheme has been developed in consultation with officers at LBWF, Design Review Panel, the GLA and through public consultation.

11.18. The submitted ES has scoped in the following areas:

- Townscape and Visual Effects;
- Built Heritage and Archaeology; and
- Cumulative Effects and Impact Interactions.

11.19. The following paragraphs briefly describe the likely effects of the proposed development with regard to various topics, during the construction works and once the development is complete and operational.

Townscape and Visual Effects

- 11.20. Volume 3 of the ES has been prepared by Stantec and assesses issues relating to townscape and visual effects.
- 11.21. A Study Area for the Townscape Visual Impact Assessment (TVIA) has been generated based on Zone of Theoretical Visibility (ZTV) up to 2.5km from the site which established worst case scenario in terms of visibility. In this case the detailed study area for the TVIA extends to 1km radius from the site for townscape features and townscape / landscape character. This is considered a reasonable approach.
- 11.22. Verified views is a technique that ensures any graphic or photo depiction of an application scene from different viewpoints are realistic. The methodology involves taking and applying Ordinance Datum measurements. This means that any views with the proposed development shown are realistic and 'verified'.
- 11.23. A visual appraisal of the site and its environs has been undertaken to determine the likely visibility of the site from these areas. The visual envelope of the overall development has been established throughout the iterative design process, in close liaison with LBWF officers who have attended a number of meetings during the design process.
- 11.24. Data has been collected, collated and reviewed to establish the baseline townscape and townscape/landscape character information, including topography, townscape planning designations and published sources of townscape character or, where relevant, landscape character. It is noted that the ES does not identify local townscape character areas between the site and the conservation areas but has provided commentary on the impact which is deemed to be not significant.
- 11.25. TVIA views were updated as the need for further information / consideration of the visual impacts was such that additional views were submitted from public rights of way, public open space, roads/ pavements and edges of residential areas. Additional viewpoints were requested and have been provided in Appendix B of the updated ES report. These were primarily requested as heritage views to understand the effects on designated and non-designated heritage assets, assessment visual impacts in relation to these viewpoints.

During Construction

- 11.26. Adverse effects occur during construction as a result of the presence of cranes, excavators and lorries, scaffolding, hoardings, construction activity, and storage compounds and mounds. These will temporarily change the townscape elements of the site and cause visual disruption.
- 11.27. The ES and the townscape assessment identified direct and short-term (temporary) adverse effects of moderate significance. Adverse, direct and short-term effects during construction which are assessed being of a minor level of significance, and therefore not significant, during the construction period are Townscape Designation: Lloyd Park Conservation Area and Townscape Features: Vegetation in the Site / contribution to Green Infrastructure.
- 11.28. Effects during construction which are a negligible level of significance, and therefore not significant, are those upon National Landscape Character Area Profile (NCA). Northern Thames Basin. It is anticipated that there would be no effects Townscape Designation: Walthamstow Village or Orford Road Conservation Areas due to absence of intervisibility between the receptor locations and the Proposed Development.

- 11.29. Adverse, direct and short-term (temporary) visual effects during the construction period, which are a **major level of significance**, are assessed for views from Entrance to Chestnuts Fields, Spruce Hills Road and Chestnuts Fields as these locations are local, close up views of the site encompassing the construction of the proposed development from within the public open space of Chestnuts Field, which falls within the site boundary and forms part the setting for the listed Waltham Forest Town Hall.
- 11.30. The assessment has identified adverse (temporary), direct and short-term visual effects which are a moderate level of significance for people's views from the following locations, during the construction period; Junction between Farnan Avenue and Forest Road, Forest Road south of Site, Adjacent to Chestnut Farm Allotments and VL10 south eastern corner of Chestnuts Field.
- 11.31. Visual effects that are of a minor level of significance, and therefore 'not significant', are assessed for the following view locations during the construction period; Thorpe Coombe Hospital, Forest Road, Junction between Farnan Avenue and Chandos Avenue, Hurst Road and Winns Terrace, adjacent to Lloyd Park.

On Completion

- 11.32. Direct and long-term beneficial effects that are a **moderate level of significance** arise on completion of the development for the following townscape receptors; Character of the site, scale, grain and massing and Legibility. These are considered to arise from the reuse and regeneration of the site through new residential-led mixed used development, which includes new public realm and open space.
- 11.33. The new development creates improvements to the site's character; scale, grain and massing particular in relation to setting of listed Waltham Forest Town Hall building; appearance; and legibility; and new tree planting will be located throughout the proposed development, including within new public realm, streets and open spaces. Beneficial, long term visual effects which are a major level of significance are assessed for views from Chestnuts Field.
- 11.34. Adverse, long term visual effects, which are of a major level of significance are assessed for views from Entrance to Chestnuts Fields, Spruce Hills Road, where the existing open view of the listed Waltham Forest Town Hall building and clock tower across the public open space of Chestnuts Field would be largely obscured by the Proposed Development.
- 11.35. Long term visual effects which are beneficial, and a moderate level of significance, are assessed for the following view locations on completion; Junction between Farnan Avenue and Forest Road and Forest Road south of Site and Adjacent to Chestnut Farm Allotments and South-eastern corner of Chestnuts Field.
- 11.36. Long term visual effects which are beneficial, and a minor level of significance thus 'not significant', are assessed for the following view locations on completion; Thorpe Coombe Hospital, Forest Road, VL6 Junction between Farnan Avenue and Chandos Avenue and Hurst Road.
- 11.37. On completion no significant visual effects are anticipated for Winns Terrace, adjacent to Lloyd Park due to the absence of intervisibility between visual receptors and the proposed development at this location.
- 11.38. Cumulative townscape and visual effects have been identified as being **negligible to minor adverse** and are considered to be **not significant**. In summary the assessment

of the completed development with regard to Townscape Effects as set out in Appendix E of the ES and in summary:

- **Moderate beneficial effects** - Character of the Site, scale, grain and massing, and legibility.
- **Minor beneficial effects** - Townscape Features: Vegetation in the Site / contribution to Green Infrastructure, Appearance and Public Realm.
- **Negligible:** National Landscape Character Area Profile (NCA) 111. Northern Thames Basin and Townscape Features: Landmarks.

- 11.39. In this regard, the representative viewpoints, and the assessment of the townscape effects as part of the TVIA and the ES conclude that the completed operational development would have positive and negative elements however these changes relate positively to achieving the wider regeneration, planning and design objectives.
- 11.40. As such, the proposed development when completed is considered to have, on balance, an overall beneficial effect on the townscape in accordance with the NPPF, NPPG and local policies, DM31 of the WFLP DM Policies (2013).
- 11.41. Quod on behalf of the Council confirm that the TVIA report has fully assessed the potential impacts of the proposed development. In this instance an adequate level of analysis has been undertaken.

Effects on Visual Receptors

- 11.42. The most sensitive of the visual receptors that would experience a noticeable or pronounced magnitude of change of view have been assessed from representative views and specific views as set out in Appendix F of the ES. It is assessed and borne in mind that in most cases, proposed development in urban environments is likely to result in a combination of beneficial and adverse visual effects within the same view composition.
- 11.43. In summary, overall sensitivity of townscape visual receptors is assessed as follows:
- a. *High Sensitivity* – Lloyd Park Conservation Area; townscape Features: landmarks
 - b. *Medium Sensitivity* – Walthamstow Village Conservation Area; Orford Road Conservation Area; the character and appearance of the Site; scale, grain, heights, and massing; legibility; and its public realm and townscape features: vegetation in the Site / contribution to Green Infrastructure
 - c. *Low Sensitivity* - NCA 111. Northern Thames Basin;
- 11.44. For visual receptors, the overall sensitivity is assessed as follows:
- a. *High Sensitivity* -Entrance to Chestnuts Fields, Spruce Hills Road; Chestnuts Fields; Winns Terrace, adjacent to Lloyd Park; Adjacent to Chestnut Farm Allotments; Adjacent to Chestnut Farm Allotments;
 - b. *Medium Sensitivity* - Junction between Farnan Avenue and Forest Road; Forest Road south of Site; Thorpe Coombe Hospital, Forest Road; Junction between Farnan Avenue and Chandos Avenue; Hurst Road; eastern corner of Chestnuts Field
- 11.45. Whilst the overall change, magnitude and significance of the views would be adverse during construction to beneficial on completion except from entrance to Chestnuts Fields and Spruce Hills Road, the following mitigations have been committed to:

- **Height and massing response to context** – building heights are arranged to minimise impact of development on the surrounding area, ranging from 3 to 9 storeys in height. Building heights and massing seek to reference the height of the existing Town Hall and assembly hall, with adjacent buildings of 5 storeys. Taller buildings of 6-9 storeys are located away from the civic centre with the tallest being positioned in the eastern part of the Site, adjacent to the existing buildings of Waltham College.
- **Architectural appearance** – the building layout mirrors the original, regular layout of the Town hall and Assembly Hall. Buildings are geometric in appearance with flat roofs which is consistent with the existing buildings on Site and provides visual coherency and legibility. Building materials used are in keeping with the surrounding context of the civic buildings and Waltham College.
- **New secondary routes which respond to existing urban grain** – enhanced permeability of the Site through the provision of new cycle and pedestrian links from Forest Road and Farnan Avenue. Several pedestrian links from Forest Road through the front lawns of the Town Hall will be created.
- **New green space** – the lawns in front of Town Hall and the Civic Building will be enhanced, creating improved public spaces that will enhance the proposed and existing buildings within the development and will provide structure to the landscape.
- **Town Hall Gardens** – to the rear of Town Hall will be a formalised garden;
- **Chestnut Field** – the recreational field to the north of the development will be enhanced through creation of a wetland landscape with aquatic planting and a circular walking route.
- **Animation of the new public space** – active uses at the edges of the buildings and new public spaces
- **Considerate construction** – construction works to be carried out in a considerate manner and in line with the Construction Environment Management Plan submitted with the application.

11.46. The ES concludes that the proposed development as a matter of judgement would respond appropriately to the townscape characteristics and its wider context, as part of enhanced placemaking and is considered to be in accordance with relevant legislation, national and local planning policies and guidance with regard to scale, form, land use, materiality, and public realm. The development would provide large scale mixed use development, more active frontages, and greater human interest in this strategic location, extending vibrancy into an area of the townscape.

11.47. Volume 3 of the ES has been independently reviewed by Quod on behalf of LBWF who raised no concerns with the baseline information or the conclusions therein.

Built Heritage and Archaeology

11.48. Chapter 7 of the main ES report prepared by Orion Heritage Ltd and draws upon the Archaeological Desk-Based Assessment and considers the known archaeological remains, and likely unknown buried archaeological remains that may survive on the site and be impacted by the proposed development.

11.49. Policies HC1, D4, D6, D8, and D9 of the London Plan (2021) are relevant. In addition, Policies DM28, DM29, DM30, DM31 and DM32 of the Waltham Forest Local Plan Development Management Policies (2013) are also relevant

- 11.50. The site contains designated built heritage assets including the Town Hall and Assembly Hall buildings which are both Grade II listed buildings. The site does not fall within a designated conservation area.
- 11.51. In summary the following cultural heritage receptors are identified within or immediately adjacent to the site:
- Grade II listed Walthamstow Town Hall (NHLE 1190868);
 - Grade II listed Assembly Hall to south east of Town Hall (NHLE 1065621)
 - Grade II listed Walthamstow Civic Centre pair of flagpoles in forecourt to south of centre (NHLE 1190879);
 - Grade II listed War Memorial, Waltham Forest Town Hall (NHLE 1418595);
 - Grade II listed Gates, Gate piers and Railings at Walthamstow Civic Centre (NHLE 1293616);
 - Grade II listed Walthamstow Civic Centre eight pairs of gate piers in forecourt to south of centre (NHLE 1065622);
 - Former Forest Magistrates' Court (building with a Certificate of Immunity) (NHLE 1467132);
 - Group value of Heritage Assets on Site
 - Potential non-designated archaeological remains (buried).

Demolition and During Construction

- 11.52. The potential demolition, construction and operation impacts of the proposed development on archaeology and built heritage have been assessed and are reported in this ES.
- 11.53. Demolition, construction and operation have the potential to affect the setting of the Grade II listed Walthamstow Town Hall (NHLE 1190868); Grade II listed Assembly Hall to southeast of Town Hall (NHLE 1065621) as those assets listed above.
- 11.54. The existing Magistrates Court is neither Listed, nor Curtilage Listed and was built some thirty years after the civic campus. In summary, it is not Listed, and the Certificate of Immunity from Listing confirms that the values in the design do not outweigh the loss of detail during refurbishment. As outlined in tables 7.3 and 7. 4 of the ES, the demolition of the building is considered **minor** in line with the criteria **not significant**.

On Completion

- 11.55. The proposed development would potentially have indirect impacts on the setting of designated and non-designated assets within and adjacent to the site in as much as the new development may be experienced within the setting of the designated assets and consequently may have an effect on the contribution that the settings have to the heritage significance of those assets. The above receptors have been identified which have the potential to be affected by the proposed development.
- 11.56. The ES considers that the loss of the remaining buildings will not adversely impact the setting of the Listed structures as they are, in effect, 'stand-alone' buildings which neither respond nor contribute to the setting of the heritage assets.
- 11.57. Construction of the proposed development and 'other developments' has the potential to affect the setting of designated assets by installation of construction cranes, increased road traffic, and noise during the construction programme. No significant effects have been identified in relation to this associated with the proposed

development. The 'other developments will have no effect on the significance of the identified heritage assets within and adjacent to the site.

- 11.58. The site contains no known archaeological remains and the potential for significant remains has been assessed at low. As such, no cumulative effects to archaeology are identified. However, in consultation with Historic England – GLAAS – suitable condition will be imposed to mitigate harm to potential findings.
- 11.59. It is important to note, that the proposals do not involve works to the Heritage Assets themselves, therefore their significance is not harmed. However, the proposals do have the potential to impact the significance of the buildings by development in their setting. The scheme is located largely in the north section of the study site, maintaining the unimpeded view of the heritage assets from Forest Road. Whilst elements of the development will be visible from the south, they will not undermine the prominence of the main heritage assets.
- 11.60. It is considered that broad layout of the proposed scheme takes its cue from the 'civic' nature of the study site, in the overall scale and massing of the blocks, the spaces between the existing and new buildings has been carefully considered, to respond to the symmetry inherent in the original 'Civic Campus'. Wide routes with soft and hard landscaping, together with the use of detailing and multiple materials at ground level, encourage connection and interaction with the new buildings. Whilst the detail respects that of the heritage assets, it also identifies the buildings as different in purpose from the existing Civic Campus by articulating the form, detail, and materials to respond to, without replicating, that of the Heritage Assets on site.
- 11.61. Mitigation measures are outlined in Chapter 3 of the ES and are embedded measures relevant to the Historic Environment as follows. The design of the new Civic Centre will respond to the existing grouping by:
- creating a symmetry with the Assembly Hall opposite, both of which frame the Town Hall;
 - materials and detail responding to those of the Town Hall without creating a pastiche. Pre-cast stone is used to identify the building as part of the Civic grouping rather than the residential units;
 - proportions being modulated to reflect the Town Hall, and interpretation of the columns linking the three buildings;
 - The quotation, originally intended to run across the frieze of the three buildings, is now completed.
- 11.62. Furthermore, the design of the residential blocks to the east and west of the Town Hall will respond to the existing grouping by:
- spaces between buildings are wide and allow appreciation of both facades avoiding a tunnel-like experience. Hard and soft landscaping is deployed to encourage people to connect with the space, and the changes of level are defined so as to fragment what might otherwise be tunnel-like routes.
 - the scale and envelope of the residential blocks follows that of the existing civic buildings, with no level on the elevations above the eaves line of the Town Hall.
 - proportion and detail also follow the rhythm of the Town Hall. At upper levels, the elevations are broken by the vertical small brickwork step on which the rainwater pipes are set. These present a contemporary reflection of those on the Town Hall, provide divisions along the length of the elevation.

- detail design which includes flat relief to the underside of the balconies, and sloping reveals in brickwork respond to the detail of the Town Hall but remain subservient to its focal position on the Site.
- however, the residential blocks signal their different purpose by their difference in materials which is brick, although the colour is selected to complement the Town Hall, it does not overwhelm it.
- at ground level, there is a change in material, including the use of glass and glazed tiles which identifies the entrances and encourages engagement at this level.
- Re-landscaping to encourage public engagement to enhance the architectural significance of the listed flagpoles;
- Repair and refurbishment of the listed railings to enhance their historic values.

11.63. The ES has suitably considered that the construction and operational stages of the proposed development will result in no more than a **minor adverse** impact on the significance of designated and built heritage assets within and adjacent to the site. At para. 7.6.9 of the ES it concludes that the residual effects to archaeology is considered to be have low potential for significant remains of all periods arising from the development during its operational phase and therefore is **negligible**. To safeguard, Historic England (Greater London Archaeological Advisory Service) were consulted raising no objection subject to a condition being imposed requiring a Written Scheme of Investigation to be submitted and approved prior to works commencing on-site. This will be conditioned.

11.64. Chapter 7 of the ES has been independently reviewed by Quod on behalf of LBWF who raised no concerns with the baseline information or the conclusions of the chapter.

Environmental Statement Conclusions

Effect Interactions

11.65. Effect interactions is the combination of different environmental effects resulting from one project upon individual receptors.

11.66. Demolition and construction effects can be a nuisance and may have an impact on local air quality and amenity, however the effects are usually temporary, short-term and transient. As the build progresses around the site, the effects may be localised and vary in magnitude and intensity depending on the location and proximity to nearby sensitive receptors. This is a product of construction development and in this respect can vary from **minor adverse** (not significant) to **major adverse** (significant). Demolition and construction activities, notably noise on nearby sensitive residential receptors can be affected. However, the ES concludes the periods of the noise effects would be limited and would not occur at an individual receptor for the duration of the demolition and construction programme, and the townscape and visual effects would be short term and temporary. As such, no new significant adverse impact interactions are anticipated during this phase.

11.67. Operationally, potential negligible adverse and negligible positive effects on nearby heritage assets. The TVIA has identified long term beneficial effect in relation to townscape impacts ranging from **neutral to moderate beneficial** due to regeneration of the site and its many improvements to public realm and placemaking.

11.68. To mitigate and reduce these impacts as far as possible the Historic England - GL LBWF Environmental Health Officers and the Lead Local Flood Authority have requested stringent conditions regarding Construction Environmental Management Plan, Contamination and Remediation Strategy accompanied with verification and

ongoing monitoring, Odour Management, Air Quality and Dust Mitigation Plan, Flood Risk Assessment, Surface Water Drainage and Piling. No groundwater infiltration will occur, and all surface water will be tanked and attenuated into the sewer to avoid leaching of contaminants into the groundwater.

- 11.69. The ES concludes that future residents within the site are likely to incur **no significant adverse** effect interactions in relation to wind effects on ground level public and private amenity spaces within the site. Equally, local residents are likely to incur **beneficial effect interactions** from improved public realm and connections to and from Forest Road.

Conclusions

- 11.70. The ES has identified that the proposed development will result (inter alia) in the following key benefits:
- Provision of 433 new homes, contributing 4% and 3.5% to the LBWF's housing target based on the London Plan (2016) (based on 10,677) and London Plan (2021) (based on 12,640) respectively;
 - Provision of approximately 125 FTE jobs over the duration of the four year demolition and construction period;
 - Provision of 48 FTE jobs once complete and operational;
 - Provision of non-residential flexible Class E and F floorspace (4,438sqm GIA); and
 - Provision of 59,860sqm of shared communal space for future residents;
- 11.71. The ES concludes that once completed and operational, the proposed development would likely result in **Significant Permanent Beneficial Effects** relating to townscape, visual and heritage aspects. No significant adverse or neutral effects have been identified.
- 11.72. Overall, officers have given careful consideration to the submitted ES and where impacts have arisen from the proposed development, adequate mitigation measures have been introduced to make the proposed development acceptable in planning terms.
- 11.73. The ES has been independently reviewed by Quod on behalf of the LPA who are satisfied with the conclusions as set out in the ES.

12. PLANNING OBLIGATIONS

- 12.1. Section 106 Legal Agreements are a material consideration in the determination of a planning application. The purpose of such an agreement is to make otherwise unacceptable development acceptable and they should only be sought where they meet all the following tests:
- i) Necessary to make the development acceptable in planning terms,
 - ii) Directly related to the development; and
 - iii) Fairly and reasonably related in scale and kind to the development.
- 12.2. In terms of the S106 Agreement, the required Heads of Terms, having regard to planning policy, the Waltham Forest Local Plan Revised Planning Obligations SPD (2017) and the Waltham Forest Local Plan Affordable Housing and Viability SPD (2018), for this development relate to the Heads of Terms as outlined in Section 1 of this report

13. ADDITIONAL CONSIDERATIONS

Public Sector Equality Duty

- 13.1. In making your decision you must have regard to the public sector equality duty (PSED) under s.149 of the Equalities Act. This means that the Council must have due regard to the need (in discharging its functions) to:
- A. Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act
 - B. Advance equality of opportunity between people who share a protected characteristic and those who do not. This may include removing or minimising disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic; taking steps to meet the special needs of those with a protected characteristic; encouraging participation in public life (or other areas where they are underrepresented) of people with a protected characteristic(s).
 - C. Foster good relations between people who share a protected characteristic and those who do not including tackling prejudice and promoting understanding.
 - The protected characteristics are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation.
 - The PSED must be considered as a relevant factor in making this decision but does not impose a duty to achieve the outcomes in s.149 is only one factor that needs to be considered and may be balance against other relevant factors.
 - It is considered that the recommendation to grant permission in this case would not have a disproportionately adverse impact on a protected characteristic.

Human Rights

- 13.2. In making your decision, you should be aware of and take into account any implications that may arise from the Human Rights Act 1998. Under the Act, it is unlawful for a public authority such as the London Borough of Waltham Forest to act in a manner that is incompatible with the European Convention on Human Rights.
- 13.3. You are referred specifically to Article 8 (right to respect for private and family life), Article 1 of the First Protocol (protection of property). It is not considered that the recommendation to grant permission, in this case, interferes with local residents' right to respect for their private and family life, home, and correspondence, except insofar as it is necessary to protect the rights and freedoms of others (in this case, the rights of the applicant). The Council is also permitted to control the use of property in accordance with the general interest and the recommendation to grant permission is considered to be a proportionate response to the submitted application based on the considerations set out in this report.

14. CONCLUSIONS

- 14.1. The report provides Officer's comprehensive consideration of the planning application and its supporting documentation, including the further/additional information submitted and any representations received.

- 14.2. The conditions set out in the agreed s.106 Heads of Terms would ensure that any adverse impact of the scheme is mitigated against and the positive aspects of the proposal advanced by the applicant are carried out through the implementation.
- 14.3. The report has considered the proposals in light of the adopted and emerging development plan policies and other material considerations or representations relevant to the environment effects of the proposals.
- 14.4. The application, if approved, would deliver significant regenerative and transformational benefits, not least including:
- The transformational regeneration of the Town Hall Fellowship Sq. complex in Walthamstow;
 - 433 new residential units (50% of which are affordable) which contribute towards meeting local housing targets;
 - Car-free residential development except for the provision of wheelchair accessible spaces;
 - Promoting sustainable modes of transport with less reliance on the private car;
 - Promoting Active Travel and Enjoy Waltham programmes;
 - Enhanced cycle facilities along Forest Road
 - Creation of extensive new public realm spaces, providing a mix of uses, including flexible commercial floorspace under Use Classes E and F– comprising 4,438sqm of new fit for purpose office accommodation, café, and community floorspace;
 - New nursery providing early years childcare provision;
 - Animation of the new public space – active uses at the edges of the buildings and new public spaces
 - Over 59,860sqm of publicly accessible open space, new improved public spaces and new walking and pedestrian landscaped links and formalised gardens to Chestnuts Field and the Council's front lawns where enhancements will be created;
 - Urban greening factor of 0.53;
 - Overall net gain in biodiversity
 - Delivery of greenfield run-off rates, reducing the risk of surface water flooding;
 - Optimisation of development potential of the site along the Forest Road Corridor in an area allocated for transformative growth;
 - Incorporate the highest environmental standards and would be sustainable;
 - Deliver acceptable energy reduction measures and meet the required carbon dioxide reduction targets through air quality, noise and renewable energy considerations; and
 - Valuable CIL contributions.
- 14.5. Extensive pre-application discussions have been held between the Local Planning Authority and the applicant, the GLA, TfL and other relevant areas of expertise. The full planning application is supported by an Environmental Statement which has been reviewed by and independent qualified Environmental Impact Assessor.
- 14.6. The project is accompanied by a robust public consultation programme including community newsletters, drop in events and a regeneration webpage. The application has received a lot of public interest.
- 14.7. The proposed development would result in making better use of land and achieve optimisation of an underused brownfield site for existing and future generations. The principle of the development and proposed land uses have been reviewed and considered acceptable by officers in accordance with local and regional planning policies. The GLA is strongly supportive of optimising this strategic site for large scale residential led development as allocated in the draft Site Allocation Document.

- 14.8. The development would deliver 50% affordable housing and is eligible for GLA Fast Track route. The development would deliver on balance, policy compliant ratio of London Affordable Rent (47%) and Shared Ownership (53%).
- 14.9. The height, scale, massing, and design of the development are acceptable and would result in high quality architecture and density which is considered appropriate for the location within this strategic location.
- 14.10. The scheme would deliver approximately 230 new trees across the site and mature trees along the boundary of the site are to be retained and maintained.
- 14.11. The scheme would directly deliver important walking and cycling improvements and would fund walking and cycling improvements outside of the site through S106 contributions.
- 14.12. An extensive SuDS strategy has been designed to attenuate the surface water flood risk to greenfield run off rates.
- 14.13. The proposal would have a low carbon energy strategy comprising Air Source Heat Pumps and Solar PV to maximise the renewable energy provision on site.
- 14.14. The proposal would make significant CIL contributions, as well as significant social infrastructure. Identified concerns would be appropriately mitigated through the inclusion of conditions and obligations within the legal agreement.
- 14.15. Overall, officers have given careful consideration to the submitted ES and where impacts are forecast to arise from the proposed development, adequate mitigation measures have been introduced to make the proposed development acceptable in planning terms.

15. RECOMMENDATION

- 15.1. That authority to be given to the Assistant Director of Development Management and Building Control in consultation with the Council's Legal Services for the sealing of the Legal Agreement and to agree any minor amendments to the conditions or the Legal Agreement on the terms set out above.
- 15.2. In the event that the Section 106 legal agreement is not completed within a reasonable timeframe following the date of Planning Committee, the Assistant Director of Development Management and Building Control is hereby authorised to refuse the application in consultation with the Chair. In the absence of this Legal Agreement, the proposed development would not be able to deliver the mixed-use development on the site. The implication of this happening is that the opportunity for securing the provision of affordable housing would be lost. Additionally, financial and non-financial contributions would be lost, which otherwise would be secured by s.106 legal agreement.

PLANNING CONDITIONS

Time Limit

1. The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

REASON: For the avoidance of doubt and in the interests of proper planning.

Approved Plans and Documents

2. The development hereby permitted shall be carried out in accordance with the following approved plans and supporting documents and thereafter maintained as such for the lifetime of the development:

Drawings Numbered:

1906_P_106_201	Existing Site Plan_P2	
1906_P_101_001	Site Location Plan_P3	
1906_P_101_002	Demolition Plan_P2	
1906_P_101_200	Site Wide Masterplan_Lower Ground Plan_P3	
1906_P_101_201	Site Wide Masterplan_P3	
1906_P_101_203	Site Wide Masterplan_Typical Plan_P3	
1906_P_101_204	Site Wide Masterplan_Roof Plan_P3	
1906_P_101_205	Site Wide Masterplan_Phasing Plan_P3	
1906_P_103_101	Site Wide Sections_AA_BB_CC_P1	
1:1906_P_103_102	Site Wide Sections_DD_EE_FF_P1	
1906_P_103_103	Site Wide Sections_01_02_03_P1	
1906_P_103_104	Site Wide Sections_04_05_06_P1	
1906_P_101_300	Block C_Ground Floor plan_P4	
1906_P_101_301	Block C_First Floor plan_P4	
1906_P_101_302	Block C_Second Floor plan_P4	
1906_P_101_303	Block C_Third Floor plan_P4	
1906_P_101_304	Block C_Fourth Floor plan_P4	
1906_P_101_305	Block C_Fifth Floor plan_P4	
1906_P_101_306	Block C_Sixth Floor plan_P4	
1906_P_101_307	Block C_Seventh Floor plan_P4	
1906_P_101_308	Block C_Eighth Floor plan_P4	
1906_P_101_309	Block C_Roof plan_P4	
1906_P_102_101	Block C_Elevation_1_(West)_P2	
1906_P_102_102	Block C_Elevation_2_(North)_P1	
1906_P_102_103	Block C_Elevation_3_(North East)_P2	
1906_P_102_104	Block C_Elevation_4_(South East)_P1	
1906_P_102_105	Block C_Elevation_5_(South)_P1	
1906_P_102_106	Block C_Courtyard_Elevation_6_(East)_P1	
1906_P_102_107	Block C_Courtyard_Elevation_7_(South East)_P1	
1906_P_102_108	Block C_Courtyard_Elevation_8_(South West)_P1	
1906_P_103_101	Block C_Sections_P2	
1906_P_211_100	Block C_Bay Studies_P1	1:50
1906_P_101_401	Block D_Ground Floor plan_P3	
1906_P_101_402	Block D_First Floor plan_P3	
1906_P_101_403	Block D_Second Floor plan_P3	
1906_P_101_404	Block D_Third Floor plan_P3	
1906_P_101_405	Block D_Fourth Floor plan_P3	
1906_P_101_406	Block D_Roof plan_P3	

1906_P_102_400 Block D_Elevations_P1
 1906_P_103_400 Block D_Sections_P1
 1906_P_211_401 Block D_Bay Studies_P1
 2100302_WFTH_DAS_P1.pdf
 2100 Series - Proposed GA Plans
 163-GS-XX-00-GA-A-2100 Proposed Ground Floor Plan – PL-01
 163-GS-XX-01-GA-A-2101 Proposed First Floor Plan – PL-00
 163-GS-XX-02-GA-A-2102 Proposed Second Floor Plan – PL-00
 163-GS-XX-RF-GA-A-2103 Proposed Roof Plan – PL-01
 2200 Series - Proposed GA Sections
 163-GS-XX-ZZ-GA-A-2200 Proposed Section AA – PL-01
 163-GS-XX-ZZ-GA-A-2201 Proposed Section BB – PL-01
 163-GS-XX-ZZ-GA-A-2202 Proposed Section CC – PL-01
 2300 Series - Proposed GA Elevations
 163-GS-XX-ZZ-GA-A-2300 Proposed South Elevation – PL-00
 163-GS-XX-ZZ-GA-A-2301 Proposed West Elevation – PL-00
 163-GS-XX-ZZ-GA-A-2302 Proposed North Elevation – PL-00
 163-GS-XX-ZZ-GA-A-2303 Proposed East Elevation – PL-00
 3000 Series - Proposed Bay Studies
 163-GS-XX-ZZ-GA-A-3000 Proposed Bay Study South – PL-01
 163-GS-XX-ZZ-GA-A-3001 Proposed Bay Study East – PL-01
 P-1200 Series - Proposed GA Plans
 MLUK-709-A -P-XB-1199 Bldg B - Level 00 Lower - Proposed GA Plan
 MLUK-709-A-P-XB-1200 Bldg B - Level 00 Upper - Proposed GA Plan
 MLUK-709-A -P-XB-1201 Bldg B - Level 01 - Proposed GA Plan
 MLUK-709-A-P-XB-1202 Bldg B - Level 02 - Proposed GA Plan
 MLUK-709-A-P-XB-1203 Bldg B - Level 03 - Proposed GA Plan
 MLUK-709-A-P-XB-1204 Bldg B - Level 04 - Proposed GA Plan
 MLUK-709-A-P-XB-1205 Bldg B - Roof Level - Proposed GA Plan
 MLUK-709-A-P-HJ-1219 Bldgs H&J - Level 00 Lower - Proposed GA Plan REV A
 MLUK-709-A-P-HJ-1220 Bldgs H&J - Level 00 Upper - Proposed GA Plan REV A
 MLUK-709-A-P-HJ-1221 Bldgs H&J - Level 01 - Proposed GA Plan
 MLUK-709-A-P-HJ-1222 Bldgs H&J - Level 02 - Proposed GA Plan
 MLUK-709-A-P-HJ-1223 Bldgs H&J - Level 03 - Proposed GA Plan
 MLUK-709-A-P-HJ-1224 Bldgs H&J - Level 04 - Proposed GA Plan
 MLUK-709-A-P-HJ-1225 Bldgs H&J - Roof Level - Proposed GA Plan
 P-2100 Series - Proposed GA Sections
 MLUK-709-A-P-XB-2100 Bldg B - Proposed Section A
 MLUK-709-A-P-XB-2101 Bldg B - Proposed Section B
 MLUK-709-A-P-XB-2102 Bldg B - Proposed Section C
 MLUK-709-A-P-XB-2103 Bldg B - Proposed Section D
 MLUK-709-A-P-XH-2110 Bldg H - Proposed Section E
 MLUK-709-A-P-XH-2110 Bldg H - Proposed Section F
 MLUK-709-A-P-XH-2110 Bldg H - Proposed Section G
 MLUK-709-A-P-XH-2110 Bldg H - Proposed Section H
 MLUK-709-A-P-XJ-2120 Bldg J - Proposed Section I
 MLUK-709-A-P-XJ-2120 Bldg J - Proposed Section J
 P-3100 Series - Proposed GA Elevations
 MLUK-709-A-P-XB-3100 Bldg B - Proposed North Elevation
 MLUK-709-A-P-XB-3101 Bldg B - Proposed East Elevation
 MLUK-709-A-P-XB-3102 Bldg B - Proposed South Elevation
 MLUK-709-A-P-XB-3103 Bldg B - Proposed West Elevation
 MLUK-709-A-P-XH-3110 Bldg H - Proposed North Elevation
 MLUK-709-A-P-XH-3111 Bldg H - Proposed East Elevation
 MLUK-709-A-P-XH-3112 Bldg H - Proposed South Elevation REV A

MLUK-709-A-P-XH-3113	Bldg H - Proposed West Elevation	REV A
MLUK-709-A-P-XJ-3120	Bldg J - Proposed North Elevation	
MLUK-709-A-P-XJ-3121	Bldg J - Proposed East Elevation	
MLUK-709-A-P-XJ-3122	Bldg J - Proposed South Elevation	
MLUK-709-A-P-XJ-3123	Bldg J - Proposed West Elevation	
P-3800 Series - Proposed Bay Studies		
MLUK-709-A-P-XX-3800	Bay Study - Building B North	
MLUK-709-A-P-XX-3801	Bay Study - Building B South	
MLUK-709-A-P-XX-3802	Bay Study - Building B West Entrance	
MLUK-709-A-P-XX-3803	Bay Study - Building B Courtyard	
MLUK-709-A-P-XX-3804	Bay Study - Building B Courtyard Side	
MLUK-709-A-P-XX-3805	Bay Study - Building J South	
MLUK-709-A-P-XX-3806	Bay Study - Building J West	
P-5100 Series - Proposed Typical Unit Plans		
MLUK-709-A-P-XX-5100	Typical Unit Plan - 0B1P - Type A	
MLUK-709-A-P-XX-5110	Typical Unit Plan - 1B2P - Type A	
MLUK-709-A-P-XX-5111	Typical Unit Plan - 1B2P - Type B	
MLUK-709-A-P-XX-5122	Typical Unit Plan - 2B3P - Type C	
MLUK-709-A-P-XX-5130	Typical Unit Plan - 2B4P - Type A	
MLUK-709-A-P-XX-5131	Typical Unit Plan - 2B4P - Type B	
MLUK-709-A-P-XX-5132	Typical Unit Plan - 2B4P - Type C	
MLUK-709-A-P-XX-5140	Typical Unit Plan - 3B5P - Type A	
MLUK-709-A-P-XX-5144	Typical Unit Plan - 3B5P Maisonette - Type A	
P-5200 Series - Proposed Wheelchair Unit Plans		
MLUK-709-A-P-XX-5200	WCH Unit Plan - 1B2P - Type A	
MLUK-709-A-P-XX-5201	WCH Unit Plan - 1B2P - Type B	
MLUK-709-A-P-XX-5202	WCH Unit Plan - 1B2P - Type C	
MLUK-709-A-P-XX-5220	WCH Unit Plan - 2B3P - Type A	
MLUK-709-A-P-XX-5221	WCH Unit Plan - 2B3P - Type B	
MLUK-709-A-P-XX-5222	WCH Unit Plan - 2B3P - Type C	
MLUK-709-A-P-XX-5223	WCH Unit Plan - 2B3P - Type D	
MLUK-709-A-P-XX-5230	WCH Unit Plan - 2B4P - Type A	
MLUK-709-A-P-XX-5231	WCH Unit Plan - 2B4P - Type B	
MLUK-709-A-P-XX-5232	WCH Unit Plan - 2B4P - Type C	
MLUK-709-A-P-XX-5240	WCH Unit Plan - 3B5P - Type A	

- Planning Statement prepared by Barton Willmore March 2021
- Affordable Housing Statement prepared by One Housing Group March 2021
- Design & Access Statement prepared by Metropolitan Workshop, Maccreeanor Lavington and Gort Scott, March 2021
- Accessibility Statement (Civic and Site Wide) prepared by David Bonnet Associates March 2021
- Accessibility Statement (Block B, C, D, H, J) prepared by David Bonnet Associates June 2021
- Landscaping Plans by GrossMax:

981143-10-01 Landscape GA Rev 01 (superseding Rev 00)

981143-10-02 Hardworks Rev 01 (superseding Rev 00)

981143-10-03 Softworks Rev 01 (superseding Rev 00)

981143-10-04 Lighting and Furniture Rev 01 (superseding Rev 00)

- Health Impact Assessment prepared by Stantec March 2021
- Economic Statement prepared by Stantec March 2021
- Energy Statement (incl. Overheating Analysis) prepared by AECOM March 2021
- Sustainability Statement prepared by AECOM June 2021

- Construction Environmental Management Plan prepared by Countryside Properties July 2021
- Demolition Method Statement prepared by Countryside Properties March 2021
- Flood Risk Assessment & Drainage Strategy prepared by Stantec March 2021
- Archaeological Desk Based Assessment prepared by Orion Heritage March 2021
- Statement of Community Engagement prepared by MadeGood March 2021
- Arboricultural Impact Assessment prepared by Ruskins March 2021
- Ecological Assessment prepared by Stantec March 2021
- Habitats Regulation Assessment (EF-SAC) prepared by Stantec March 2021
- Outline Construction Logistics Plan prepared by Stantec Rev B July 2021
- Fire Safety Strategy – Civic Building prepared by Ashton Fire March 2021
- Outline Fire Safety Strategy – Residential Development prepared by Ashton Fire July 2021
- Utilities Statement prepared by AWA March 2021
- Transport Assessment including Parking Management Plan, and Delivery and Servicing Plan prepared by Stantec March 2021
- Technical Note – Access, Highways and Delivery and Servicing prepared by Stantec July 2021
- Framework Travel Plan prepared Stantec March 2021
- Air Quality Assessment prepared by Stantec March 2021
- Ground Investigation prepared by Ground Engineering March 2021
- Noise & Vibration Assessment prepared by Stantec April 2021
- Sunlight/Daylight Assessment prepared by Waterslade March 2021
- Heritage Statement prepared by Orion Heritage August 2021
- SANG Management Plan prepared by Stantec July 2021
- Security Strategy prepared by Buro Happold June 2021
- Environmental Statement (including Heritage Impact Assessment and TVIA) prepared by Stantec March 2021 (as updated by August 2021 Heritage Impact Assessment)
- Environmental Impact Assessment Technical Note prepared by Stantec July 2021
- Revised Urban Greening Assessment prepared by GrossMax July 2021
- Wind and Microclimate Report prepared by AECOM July 2021

REASON: For the avoidance of doubt and in the interests of proper planning.

Materials

3. Prior to the completion of roof slab levels and notwithstanding any indications shown on the submitted plans, samples and a schedule of materials to be used in the external surfaces of the development hereby permitted shall be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details and thereafter retained as such for the lifetime of the development.

REASON: To ensure a satisfactory appearance in accordance with Policies CS12 and CS15 of the Waltham Forest Local Plan Core Strategy (2012) and policies DM28 of the Waltham Forest Local Plan – Development Management Policies (2013).

Shopfront and Signage Strategy

4. Prior to completion of the development, a proposed shopfront and signage strategy for the commercial units within the development shall be submitted to and approved in writing by the Local Planning Authority. The agreed strategy shall thereafter be included

in any sale or lease documents issued in relation of the units and any signage displayed shall accord with the approved strategy and shall be retained in accordance with the strategy for as long as it is displayed.

REASON: To ensure that the development is not detrimental to the character and appearance of the site in accordance with Policies CS12 and CS15 of the Waltham Forest Local Plan Core Strategy (2012).

Construction Environmental Management Plan

5. Prior to the commencement of any part of the development, including demolition and site clearance, a Construction Environmental Management Plan (CEMP) shall be submitted to and approved in writing by the Local Planning Authority. The method statement shall include details of the following:
- Works of demolition and construction shall be carried out during normal working hours, i.e. 08:00 to 18:00 hours Monday to Friday, and 08:00 to 13:00 hours on Saturdays, with no noisy working audible at the site boundary being permitted on Sundays or Bank Holidays.

Construction Vehicle Access Strategy to be submitted and agreed by LBWF

- Likely noise levels to be generated from plant
- Details of any noise screening measures
- Proposals for monitoring noise and procedures to be put in place where agreed noise levels are exceeded
- Where works are likely to lead to vibration impacts on surrounding residential properties, proposals for monitoring vibration and procedures to be put in place if agreed vibration levels are exceeded. Note: it is expected that vibration over 1mm/s measured as a peak particle velocity would constitute unreasonable vibration.
- The method statement shall make reference to and comply with The Mayor of London's supplementary planning guidance (SPG) 'The control of dust and emissions from construction and demolition' <https://www.london.gov.uk/what-we-do/planning/implementing-londonplan/supplementary-planning-guidance/control-dust-and>

In particular the applicant shall:

- Submit for approval an Air Quality (dust) risk assessment
- Submit for approval an Air Quality & Dust management Plan
- Equipment and plant used on site shall comply with the requirements for 'Non-Road Mobile Machinery' (NRMM)
- Submit a for approval Dust monitoring programme

All the above submissions shall have regard to the Mayor's SPG

Reference shall be made to:

- BRE four part Pollution Control Guides 'Controlling particles and noise pollution from construction sites'.
- BS 5228: Noise and vibration on construction and open sites

REASON: To ensure considerate construction and to protect the amenities of the nearby residents from excessive noise and dust and to comply with Policies CS7 and CS13 of the adopted Waltham Forest Core Strategy (2012) and Policies DM14, DM15, DM24 and DM32 of the adopted Waltham Forest Local Plan – Development Management Policies (2013)) and comply with the London Plan and the GLA NRMM LEZ.

Archaeology

6. No demolition or development shall take place until a Stage 1 written scheme of investigation (WSI) has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, and the programme and methodology of site modelling and evaluation and the nomination of a competent person(s) or organisation to undertake the agreed works.

If heritage assets of archaeological interest are identified by stage 1 then for those parts of the site which have archaeological interest a Stage 2 WSI shall be submitted to and approved by the local planning authority in writing. For land that is included within the stage 2 WSI, no demolition/development shall take place other than in accordance with the agreed stage 2 WSI which shall include:

- A. The statement of significance and research objectives, the programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works
- B. Proposals for public outreach and interpretation if appropriate
- C. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. this part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the stage 2 WSI.

REASON: In order to protect historic assets of Archaeological interest that may be present on site, which the Local Planning Authority seeks to ensure investigated and conserved, in compliance with Policy CS12 of the adopted Waltham Forest Local Plan – Core Strategy (2012) and Policy DM28 of the adopted Waltham Forest Local Plan – Development Management Policies (2013).

Construction Logistics Plan

7. No development shall commence, excluding site preparation and enabling works, until a detailed Construction Logistics Plan has been submitted to and approved in writing by the local planning authority. The Construction and Logistics Plan and Delivery and Servicing Plan must be submitted using the TfL template and guidance found here:

www.constructionlogistics.org.uk. The logistics plan shall include details of site access, journey planning, access routes, hours of deliveries, temporary traffic arrangements or restrictions, site operation times, loading and unloading locations and material storage. All works shall be carried out in accordance with the approved details and the Construction and Logistics Plan should be implemented throughout all demolition and construction works.

REASON: To ensure considerate construction and to protect the amenities of the nearby residents to ensure that disruption is kept to a minimum and does not affect highway traffic flows to comply with Policies CS7 and CS13 of the adopted Waltham Forest WFLP Core Strategy (2012) and Policies DM14 DM15, DM24 and DM32 of the adopted Waltham Forest Local Plan– Development Management Policies (2013).

Highways Condition Survey

8. Prior to the commencement of any development on the site including demolition and site clearance and excluding Early Works as defined in the Development Agreement, a specification for a highway site condition survey to assess the condition of highway before and after construction works shall be submitted to and approved in writing by the local planning authority. The highway condition survey shall then be carried out in accordance with the approved timescales contained within the approved specification and it shall be submitted to and approved in writing by the Local Planning Authority before any part of the development is occupied. Any damage to the highway incurred as a result of the construction works, will have to be re-instated by the Council but funded by the developer, in accordance with the timescales and details agreed as part of the survey.

REASON: In the interest of pedestrian and highway safety, to comply with Policy CS7 of the Waltham Forest Local Plan – Core Strategy (2012) and Policy DM14, DM15 and DM32 of the Waltham Forest Local Plan – Development Management Policies (2013).

Non-Road Mobile Machinery

9. No NRMM shall be used on the site unless it is compliant with the NRMM Low Emission Zone requirements (or any superseding requirements) and until it has been registered for use on the site on the NRMM register (or any superseding register).

REASON: To ensure that air quality is not adversely affected by the development in line with the Mayor's SPG: The Control of Dust and Emissions during Construction and Demolition.

Air Quality Neutral

10. Prior to commencement of development, an Air Quality Assessment report, written in accordance with the relevant current guidance, for the existing site and proposed development shall be submitted to and approved by the Local Planning Authority. The development shall be at least 'Air Quality Neutral' and an Air Quality Neutral Assessment for both buildings and transport shall be included in the report. The assessment shall have regard to the most recent air quality predictions and monitoring results from the Authority's Review and Assessment process and London Atmospheric Emissions Inventory. The report shall include all calculations and baseline data and be set out so that the Local Planning Authority can fully audit the report and critically analyse the content and recommendations.

REASON: To ensure that the amenities of occupiers are protected from the poor air quality in the vicinity in accordance with Policy CS15 of the Waltham Forest Local Plan Core Strategy (2012) and Policies DM24 and DM32 of the Waltham Forest Local Plan Development Management Policies (2013)

Air Quality and Dust Management Plan (AQDMP)

11. No demolition or development shall commence until full details of the proposed mitigation measures for impact on air quality and dust emissions, in the form of an Air Quality and Dust Management Plan (AQDMP), have been submitted to and approved in writing by the local planning authority. In preparing the AQMDP the applicant should follow the recommendations outlined in the AQ assessment submitted with the application and the guidance on mitigation measures for sites set out in Appendix 7 of the Control of Dust and Emissions during Construction and Demolition SPG 2014. Both 'highly recommended' and 'desirable' measures should be included. If the development is located in or near an air quality focus area the applicant should follow the guidance on

mitigation measures for **Medium Risk** and include automatic dust monitoring as a minimum.

REASON: Development must not commence before this condition is discharged to manage and mitigate the impact of the development on the air quality and dust emissions in the area and London as a whole, and to avoid irreversible and unacceptable damage to the environment and the London Plan SPGs for Sustainable Design and Construction and Control of Dust and Emissions during Construction and Demolition.

Odour Management for hot food catering

12. Before installation works of the commercial catering kitchen are begun, a scheme shall be submitted to and approved in writing by the Local Planning Authority which specifies the fume extract arrangements, flues must terminate at roof level or an agreed high level location which will not give rise to nuisance to other occupiers of the building or adjacent buildings. Proposal should incorporate high level discharge and that anything extracting at lower levels would be an exception and would need to be fully justified. The details approved must be implemented before the use of the kitchen commences.

REASON: To ensure that the amenities of occupiers are protected from undue fumes and smells in Policy CS13 of the Waltham Forest Local Plan – Core Strategy (2012) and Policies DM24 and DM32 of the Waltham Forest Local Plan – Development Management Policies (2013).

Flood Warning and Evacuation Plan

13. Prior to any part of the permitted development being occupied, a flood warning and evacuation plan (based on the submitted Flood Risk Assessment) must be submitted to and approved in writing by the Local Planning Authority. The plan must detail the rescue and evacuation arrangements, emergency plan, provision of and adequacy of temporary refuge, and details of flood proofing and other building level resistance and resilience measures. The commitments explicitly stated in the Flood Emergency Plan shall be binding on the applicants or their successors in title. The measures shall be implemented upon the first occupation of the building hereby permitted and shall be permanently kept in place unless otherwise agreed in writing with the Local Planning Authority. Upon written request, the applicant or their successors in title shall provide the Local Planning Authority with written details of how the measures contained in the Flood Emergency Plan are being undertaken at any given time.

REASON: To ensure the safety of the residents of the development against the risk of flooding, in accordance with London Plan (2021) Policy SI 12; WFLP Core Strategy (2012) Policy CS4 and WFLP DMP (2013) Policy DM34.

Asbestos

14. The developer must either submit evidence that the site building(s) were built post 2000 or provide an intrusive pre-demolition and refurbishment asbestos survey in accordance with HSG264 supported by appropriate an appropriate mitigation scheme to control risks to future occupiers. The scheme must be written by a suitably qualified person and submitted to the Local Planning Authority (LPA) for approval before commencement. The scheme as submitted shall demonstrably identify potential sources of asbestos contamination and detail removal or mitigation appropriate for the proposed use.

Detailed working methods are not required but the scheme of mitigation shall be independently verified to the satisfaction of the LPA prior to occupation.

REASON: To ensure the risks from land contamination to future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with Policy CS13 of the adopted Waltham Forest Local Plan – Core Strategy (2012) and Policies DM24 and DM34 of the adopted Waltham Forest Local Plan – Development Management Policies (2013).

Contamination

15. Prior to commencement of construction works, a scheme including the following components (where applicable) to address the risk associated with site contamination shall be submitted to and approved in writing by the Local Planning Authority (LPA).
 - A. A Desk Study report including a preliminary risk assessment and conceptual site model.
 - B. A ground investigation based on the findings of the Desk Study Report to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site.
 - C. The results of the investigation and revised risk assessment and based on these, in the event that remediation measures are identified necessary a remediation strategy shall be submitted giving full details of the remediation measures required and how they will be undertaken.
 - D. A verification report providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy are complete

Any investigation and risk assessment must be undertaken in accordance with the Environment Agency's Model Procedures for the Management of Contaminated Land (CLR11). In the event that additional significant contamination is found at any time when carryout the approved development it must be reported immediately to the LPA.

For the avoidance of doubt, this condition can be discharged on a section by section basis.

REASON: To ensure the risks from land contamination to future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with Policy CS13 of the adopted Waltham Forest Local Plan – Core Strategy (2012) and Policies DM24 and DM34 of the adopted Waltham Forest Local Plan – Development Management Policies (2013)

Infiltration of Surface Water

16. No drainage systems for the infiltration of surface water to the ground are permitted other than with the written consent of the local planning authority. Any proposals for such systems must be supported by an assessment of the risks to controlled waters. The development shall be carried out in accordance with the approved details.

REASON: To ensure that the development does not contribute to, is not put at unacceptable risk from, or adversely affected by, unacceptable levels of water pollution caused by mobilised contaminants. This is in line with paragraph 170 of the National Planning Policy Framework, in accordance with London Plan (2021), Policy SI12; WFLP Core Strategy (2012) Policy CS4 and WFLP DMP (2013) Policy DM34.

Car Parking Management Plan

17. Prior to first occupation of any part of the development hereby approved a Car Parking Management Plan shall be submitted to and approved in writing by the Local Planning Authority. The Car Parking Management Plan shall include but not be limited to the following:
- Outline the process for allocating bays to blue badge holders (including passive bays should they be required);
 - Details on how enforcement will manage the authorised bays;
 - Details on how enforcement will manage unauthorised parking and loading;
 - Details on how loading will be managed, including what happens if any parked vehicles become blocked in; and
 - Details on how residents will be charged for the use of the electric vehicle charge points, which should be an individual charge for each use of the charge point, in line with other public network charges.

The blue badge car parking spaces shall be laid out and allocated in accordance with the approved Management Plan and shall be made available for the purposes of parking vehicles in association with the development and for no other purpose. The development shall be implemented in accordance with the approved details and retained as such for the lifetime of the development.

REASON: In the interests of highway and pedestrian safety in accordance with Policies CS7 and CS15 of the Waltham Forest Local Plan Core Strategy (2012).

18. Prior to commencement of development (other than demolition, enabling and groundworks and development below DPC level) and notwithstanding any indication on the submitted drawings, details of electric vehicle charging point locations and technical specifications shall be submitted to and approved in writing by the Local Planning Authority. The development shall be implemented in accordance with the approved details and retained as such thereafter for the lifetime of the development unless otherwise agreed in writing by the Local Planning Authority.

REASON: In the interest of effective provision of safe and well designed parking facilities in accordance with Policies CS7, CS15 and CS16 of the Waltham Forest Local Plan Core Strategy (2012) and Policy DM16 of the Waltham Forest Local Plan Development Management Policies (2013).

Cycle Parking

19. Notwithstanding the cycle parking detail provided on the approved plans, prior to the commencement of any above ground superstructure works the applicant will provide detailed and scaled drawings of the proposed cycle parking provision. The cycle parking details shall demonstrate how no less than 20% of all provision for cycle parking is provided on Sheffield stands at a minimum of 1.0m spacing, and not less than 5% of all provision is provided on Sheffield stands with wider spacing (1.8m spacing, or 900mm

side space if wider cycles are expected just on one side of a stand), and that any door to a cycle parking area will be automated, in accordance with the London Cycling Design Standards. The cycle parking thereby approved shall be retained and not used for any other purpose and maintained in good working order.

REASON: To comply with London Cycle Design Standards, Policy CS7 of the Waltham Forest Local Plan – WFLP Core Strategy (2012) and Policy DM14, DM15 and DM32 of the Waltham Forest Local Plan Development Management Policies (2013)

Delivery and Servicing Plan

20. A Delivery and Servicing Plan (DSP) shall be submitted to and approved in writing by the Local Planning Authority prior to first occupation of each phase of the development. The DSP shall make reference to safety measures that will be in place to reduce conflicts between service vehicles manoeuvring in the private car park and other users (cycle stores, disabled parking and any other pedestrians) and shall also include details on how delivery vehicles are restricted during peak periods.

REASON: In the interests of pedestrian and highway safety, in compliance with Policies CS6, CS15 and CS16 of the Waltham Forest Local Plan Core Strategy (2012) and Policies DM13, DM14, DM23 of the Waltham Forest Local Plan Development Management Policies (2013).

Stage 1 Road Safety Audit

21. No development shall take place until a Stage 1 Road Safety Audit of the approved road layout is commissioned and a 'Road Safety Audit Response Report' is submitted to and approved in writing by the Local Planning Authority detailing how the recommendations of the audit have been addressed

REASON: In the interest of highway safety, in compliance with Policies CS6, CS7, CS15 and CS16 of the Waltham Forest Local Plan - Core Strategy 2012 and Policies DM13, DM14, DM23 of the Waltham Forest Local Plan – Development Management Policies (2013).

Noise

22. Where all measures have been introduced to reduce noise from a plant or operation, yet high levels at sensitive facades or areas are still predicted or occur, and are likely to do so for a significant period, the contractor or developer should consider temporary rehousing, the provision of acoustic secondary glazing to affected windows or other sound proofing/insulation measures. This may usually be the case where at the planning stage of a development it is obvious that excessively noisy operations or equipment will have to be used, and that mitigative measures will not be successful in reducing noise to acceptable levels. Any such provision should only be installed after consultation with local residents and/or businesses, and the appropriate local authority services in respect of suitable specifications of work, for example the Housing Department.

REASON: To ensure considerate construction and to protect the amenities of the nearby residents from excessive noise and dust and to comply with Policies CS7 and CS13 of the adopted Waltham Forest Core Strategy (2012) and Policies DM14, DM15, DM24 and DM32 of the adopted Waltham Forest Local Plan – Development Management Policies (2013)) and comply with the London Plan and the GLA NRMM LEZ.

23. Noise from all new building services plant for the lifetime of the development shall be controlled to a level not exceeding 10dB(A) below the typical underlying background noise level (LA90) during the time of plant operation at a position one metre external to the nearest noise sensitive premises. The underlying background LA90 shall be determined in the absence of the new plant noise. This assessment shall be completed in accordance with BS4142: 'Method for Rating Industrial Noise Affecting Mixed Residential and Industrial Areas'.

REASON: To protect the amenities of adjoining occupiers and the surrounding area in order to comply with Policy CS13 of the Waltham Forest Local Plan – Core Strategy (2012) and Policies DM24 and DM32 of the Waltham Forest Local Plan – Development Management Policies (2013).

Sound Insulation between residential and commercial

24. Prior to the commencement of the development, a sound insulation scheme shall be submitted to and approved in writing by the Local Planning Authority, which will incorporate details of sound insulation to be installed between the commercial premises and residential premises in order to manage noise and disturbance. The scheme of noise insulation measures shall be prepared by a suitably qualified consultant/engineer and shall demonstrate that the proposed sound insulation will achieve a level of protection which is at least +5dB above the Approved Document E standard (Dwelling houses and flats) for airborne sound insulation and -5dB for impact sound insulation. The development shall be carried out in accordance with the approved scheme and shall be fully implemented prior to the development hereby approved first being brought into use and shall thereafter maintained as such for the lifetime of the development.

REASON: To protect the amenities of occupiers and the surrounding area, in order to comply with Policies CS13 and CS15 of the adopted Waltham Forest Local Plan – Core Strategy (2012) and Policies DM24 and DM32 of the adopted Waltham Forest Local Plan – Development Management Policies (2013).

Hours of Operation

25. Prior to first occupation of any part of the non-residential development, details of hours of operation shall be submitted to and approved in writing by the Local Planning Authority. Such details as approved shall be retained unless otherwise agreed in writing by the Local Planning Authority

REASON: To protect the amenities of adjoining occupiers in order to comply with Policy CS13 of the Waltham Forest Local Plan Core Strategy (2012) and Policies DM24 and DM32 of the Waltham Forest Local Plan Development Management Policies (2013).

Estate Management Plan

26. Prior to occupation, a statement will be provided detailing the Estate Management Strategy including details of CCTV, should clarify the access and a management arrangements for the public access routes through the site, will be submitted to and approved in writing by the Local Planning Authority. The development shall be implemented in accordance with the approved details maintained for the lifetime of the development.

REASON: To ensure inclusive development in accordance with Policy CS15 of the Waltham Forest Local Plan Core Strategy (2012) and DM Policies DM7 and DM9 of the Development Management Plan (2013).

27. Prior to commencement of development, notwithstanding site investigation and clearance works, demolition and construction to slab level, details relating to the entrances, including gates, entry control system, display of postal numbers and position of letter box facilities shall be submitted to and agreed in writing by the Local Planning Authority. The agreed measures shall be fully implemented prior to first occupation of the development and thereafter maintained for the lifetime of the development.

REASON: In the interest of security and sustainable development, in compliance with Policies CS15 and CS16 of the Waltham Forest Local Plan Core Strategy (2012) and Policies DM13, DM14, DM29 and DM33 of the Waltham Forest Local Plan Development Management Policies (2013).

Fire Statement

28. Prior to commencement of development, notwithstanding demolition, site clearance and preparation, ground works, an updated Fire Statement shall be submitted to and approved in writing by the Local Planning Authority. The statement should detail how the development proposal will function in terms of:
1. the building's construction: methods, products and materials used
 2. the means of escape for all building users: stair cores, escape for building users who are disabled or require level access, and the associated management plan approach
 3. access for fire service personnel and equipment: how this will be achieved in an evacuation situation, water supplies, provision and positioning of equipment, firefighting lifts, stairs and lobbies, any fire suppression and smoke ventilation systems proposed, and the ongoing maintenance and monitoring of these
 4. how provision will be made within the site to enable fire appliances to gain access to the building. The development shall be implemented in accordance with the approved details and retained as such for the lifetime of the development.
 5. Additional measures and information may be necessary in order to fulfil the firefighting access arrangements for Block H. These measures may include the following, provision of sprinkler system/firefighting shafts/dry rising mains, which will be subject to approval by the Fire Authority.

REASON: In order to protect the living conditions and safety and security of the occupants in line with Policy D12 of the London Plan (2021).

Circular Economy Statement

29. Prior to the occupation of the development hereby approved, a Post Completion Report setting out the predicted and actual performance against all numerical targets, and provide updated versions of Tables 1 and 2, the Recycling and Waste Reporting form and Bill of Materials. The applicant should set out an indicative timetable for producing the Post-Completion Report.

REASON: To demonstrate how the development will reduce waste and support the circular economy in accordance with Policy SI7 of the London Plan (2021).

Whole Life Carbon

30. Once the as-built design has been completed (upon commencement of RIBA Stage 6) and prior to the building(s) being occupied (or handed over to a new owner, if applicable), the legal owner(s) of the development should submit the post-construction Whole Life-Cycle Carbon (WLC) Assessment to the GLA at: ZeroCarbonPlanning@london.gov.uk. The owner should use the post construction tab of the GLA's WLC assessment template, and this should be completed accurately and, in its entirety, in line with the criteria set out in the GLA's WLC Assessment Guidance. The post-construction assessment should provide an update of the information submitted at planning submission stage (RIBA Stage 2/3), including the WLC carbon emission figures for all life-cycle modules based on the actual materials, products and systems used. The assessment should be submitted along with any supporting evidence as per the guidance and should be received three months post as-built design completion, unless otherwise agreed.

Reason: To ensure whole life-cycle carbon is calculated and reduced and to demonstrate compliance with Policy SI2 of the London Plan (2021).

External Lighting

31. Prior to the completion of roof slab level, details of any form of external illumination and / or external lighting on the buildings and around the site including any street lighting shall be submitted to and approved in writing by the Local Planning Authority. The approved details shall be fully implemented prior to the first occupation of any of the residential units hereby permitted and retained as such for the lifetime of the development.

REASON: In the interest of health and to protect the living conditions of existing and future residents in the locality in accordance with Policy CS13 of the Waltham Forest Local Plan Core Strategy (2012).

Safety and Security

32. Prior to the occupation of the development hereby approved, evidence that the scheme has achieved a Certificate of Compliance to the relevant Secure by Design Guide(s) or alternatively achieve Crime Prevention Standards, shall be submitted to and approved in writing by the Local Planning Authority in consultation with the Metropolitan Police. The development shall be carried out in accordance with the approved details and thereafter shall be fully retained and maintained as such for the lifetime of the development.

REASON: In the interest of health and to protect the living conditions of existing and future residents in the locality in accordance with Policy CS13 of the Waltham Forest Local Plan Core Strategy (2012).

Residential

33. All residential units shall be built to The Building Regulations (2010) Access to and use of Buildings, Approved Document M (2015 as amended), Volume 1:Dwellings, M4(2): Accessible and adaptable dwellings.

REASON: To ensure inclusive development in accordance with Policy CS15 of the Waltham Forest Local Plan Core Strategy (2012) and DM Policies DM7 and DM9 of the Development Management Plan (2013).

34. 48 of the residential units hereby permitted shall be built in accordance with Approved Document M 2015, M4 Category 3: London Affordable Rented units, M4 (3) (2) (b), and

Wheelchair user dwellings , category M4(3)(2)(a) 'Adaptable'. Circulation areas in blocks with M4(3) dwellings will be built in full accordance with Part M4(3), as referred to in publication London Plan para 3.7.2. This includes the entrance and circulation area doors which will have to be fully compliant with the relevant sections of Approved Document M. Details which are to be submitted to and approved in writing by the Local Planning Authority prior to commencement of development. All wheelchair user dwellings must provide sufficient footprint and drawings must demonstrate that they can achieve a fully accessible layout.

REASON: To ensure inclusive development in accordance with Policy CS15 of the Waltham Forest Local Plan Core Strategy (2012) and Policies DM7 and DM9 of the Waltham Forest Local Plan Development Management Policies (2013).

35. The private / communal amenity spaces and children's play areas shall be laid out and implemented in accordance with the approved plans and shall not be used for any other purpose. The balconies and communal amenity spaces shall be retained for the use of the occupiers of the development for the lifetime of the development unless otherwise agreed in writing by the Local Planning Authority.

REASON: To protect the amenities of adjoining occupiers and the surrounding area in order to comply with Policy CS13 and CS15 of the Waltham Forest Local Plan Core Strategy (2012) and Policies DM29 and DM32 of the Waltham Forest Local Plan Development Management Policies (2013).

36. Prior to commencement of development, notwithstanding site investigation and clearance works, demolition and construction to slab level, details relating to the entrances, including gates, entry control system, display of postal numbers and position of letter box facilities shall be submitted to and agreed in writing by the Local Planning Authority. The agreed measures shall be fully implemented prior to first occupation of the development and thereafter maintained for the lifetime of the development.

REASON: In the interest of security and sustainable development, in compliance with Policies CS15 and CS16 of the Waltham Forest Local Plan Core Strategy (2012) and Policies DM13, DM14, DM29 and DM33 of the Waltham Forest Local Plan Development Management Policies (2013).

37. Prior to commencement of that relevant phase of development, hereby permitted, details of any substation or energy centre or other means of enclosure shall be submitted to and approved in writing by the Local Planning Authority.

REASON: To protect the amenities of those living and working in the locality in accordance with Policy CS13 of the Waltham Forest Local Plan Core Strategy (2012) and Policy DM32 of the Waltham Forest Local Plan Development Management Policies (2013).

Children's play

38. a) Prior to occupation of the development details of the proposed children's play equipment will be submitted to and approved in writing by the local planning authority. The plans must demonstrate that playspace and equipment within the development is available to all and is not segregated by tenure. As per the approved plans, 4,429 sqm of approved children's play space shall be provided across the site.

(b) All children's play equipment will be installed in accordance with the information approved under part A and retained and maintained in perpetuity for the lifetime of the development.

REASON: In order to ensure adequate and appropriate children's play equipment is provided in accordance Policy S4 of the London Plan (March 2021).

Wayfinding strategy

39. Prior to practical completion, a wayfinding strategy prepared in accordance with the Enjoy Waltham Forest: Cycle Wayfinding Planning Guidelines (March 2017) will be submitted to and approved in writing by the Local Planning Authority in conjunction with Highways and the Enjoy Waltham Forest team. All wayfinding will be paid for by the developer whether on private land or on public highway. Wayfinding on public highway will form part of the S278 and S38 agreements.

REASON: To ensure the safe movement of pedestrians and cyclists in accordance with WFLP CS7, CS13, and WFLP DM Policy DM14.

Ecological Management Plan

40. Prior to completion of roof slab level, a Habitat Creation Management Plan (HCMP) shall be submitted to and approved in writing by the Local Planning Authority and include:
- (i) Planting of trees and shrubs in the public spaces, covering a variety of species, including those of benefit to wildlife;
 - (ii) Location of proposed habitat, bird and bat boxes; and (iii) details of biodiverse roofs.

Approved details are to be implemented and maintained as approved. Any clearance of scrub and trees within the site should be timed to avoid the bird nesting season (March to August).

Prior to the start of works on site the contractor should receive a 'toolbox' talk to describe the ecological features and species present, their legal protection and responsibilities towards them and what to do if wildlife is encountered.

REASON: To comply with WFLP Core Strategy Policy CS5, and WFLP Development Management Policy DM35.

Hard and soft landscaping scheme

41. Prior to the commencement of development on site, details of the hard and soft landscaping to be provided on site shall be submitted to and approved in writing by the Local Planning Authority. The landscaping scheme shall include details of the retained and proposed planting around the site, along with the requirement to demonstrate that all hardstanding areas are permeable. The development shall be carried out solely in accordance with the approved details and all approved planting shall be carried out in the first planting season following the occupation of the development hereby permitted or the substantial completion of the development, whichever is the sooner. Any trees, hedges, shrubs and greenspaces forming part of the approved scheme which within a period of five years, dies, is removed or becomes seriously damaged or diseased shall be replaced with others of similar size and species.

REASON: To ensure a satisfactory appearance and in the interest of local amenity and biodiversity in accordance with Policies CS5 and CS15 of the adopted Waltham Forest Local Plan Core Strategy (2012), and Policies DM29 and DM35 of the adopted Waltham Forest Local Plan – Development Management Policies (2013).

Landscape management plan

42. Prior to the commencement of the development on site, notwithstanding site investigation and clearance works, demolition and construction to slab level, a Landscape Management Plan, which includes long term design objectives, management responsibilities and maintenance schedules for all landscape areas, shall be submitted to and approved in writing by the Local Planning Authority. The approved Landscape Management Plan shall be implemented prior to the first occupation of the development hereby approved and thereafter maintained for the lifetime of the development

REASON: To ensure the well-being of the trees and in the interest of biodiversity, in accordance with Policies CS5 and CS15 of the adopted Waltham Forest Local Plan – Core Strategy (2012) and Policies DM29 and DM35 of the adopted Waltham Forest Local Plan – Development Management Policies (2013).

Landscape maintenance – 5 years minimum

43. Prior to the commencement of the development on site, notwithstanding site investigation and clearance works, demolition and construction to slab level, a schedule of landscape maintenance for a minimum period of five years shall be submitted to and approved in writing by the Local Planning Authority. The schedule shall include details of the arrangements for its implementation and management responsibilities, and it shall be implemented as agreed prior to the first occupation of the site and thereafter maintained for the lifetime of the development.

REASON: To ensure the well-being of the trees in the interest of biodiversity and visual amenity, in accordance with Policies CS5 and CS15 of the adopted Waltham Forest Local Plan – Core Strategy (2012) and Policies DM29 and DM35 of the adopted Waltham Forest Local Plan – Development Management Policies (2013).

Biodiversity landscaping (amended for site)

44. Prior to the commencement of development on site, notwithstanding site investigation and clearance works, demolition and constructions to slab level, details of the habitat provision including but not limited to, swift bricks, sparrow terraces, bat roosts, hedgehog houses and invertebrate hibernacula shall be submitted to and approved in writing by the local planning authority. The habitat provision shall be installed prior to first occupation of the development hereby approved and shall thereafter be maintained in accordance with the approved details in perpetuity.

REASON: In the interest of biodiversity and local amenity, in accordance with Policy CS5 of the adopted Waltham Forest Local Plan – Core Strategy (2012) and Policy DM35 of the adopted Waltham Forest Local Plan – Development Management Policies (2013).

Tree protection

45. No site clearance, preparatory work or development shall take place until a scheme for the protection of the retained trees (the Tree Protection Plan) and the appropriate working methods (the Arboricultural Method Statement) in accordance with British Standard

BS5837 – 2012. Trees in Relation to design, demolition and construction - Recommendations has been agreed in writing by the local planning authority.

REASON: To ensure the well-being of the trees and in the interest of biodiversity, in accordance with policy CS5 of the Waltham Forest Local Plan – Core Strategy (2012) and Policy DM35 of the Waltham Forest Local Plan – Development Management Policies (2013).

Landscaping and Trees

46. All trees shall be planted in accordance with the details and times stated in the specification in accordance with British Standard BS4043 - Transplanting Rootballed Trees and BS4428 - Code of Practice for General.

REASON: In the interest of biodiversity and local amenity, in accordance with policy CS5 of the Waltham Forest Local Plan – Core Strategy (2012) and Policy DM35 of the Waltham Forest Local Plan – Development Management Policies (2013).

Habitat boxes

47. Prior to the occupation of the development details of bird and bat boxes shall be submitted to and approved in writing by the local planning authority. The bird and bat boxes shall be installed prior to first occupation of the development hereby approved and shall thereafter be maintained in accordance with the approved details in perpetuity.

REASON: In the interest of biodiversity and local amenity, in accordance with Policy CS5 of the adopted Waltham Forest Local Plan – Core Strategy (2012) and Policy DM35 of the adopted Waltham Forest Local Plan – Development Management Policies (2013).

Boundary Treatment

48. Prior to the construction of roof slab level, details relating to the siting, design and height and finish of all new walls, gates, fencing, railings and other means of enclosure shall be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out solely in accordance with the approved details, prior to the first occupation of the use hereby approved and thereafter shall be fully retained and maintained accordingly for the lifetime of the development.

REASON: In the interest of general visual amenity, and amenity of neighbouring occupants, in accordance with Policies CS13 and CS15 of the adopted Waltham Forest Local Plan – Core Strategy (2012) and Policies DM29 and DM32 of the adopted Waltham Forest Local Plan – Development Management Policies (2013).

Connection Ready

49. Prior to the commencement of the development on site, details of the specific measures to be adopted to achieve at least a 35% reduction in carbon emissions over the 2013 Building Regulations, including a revised Energy Strategy, shall be submitted to and approved in writing by the Local Planning Authority, in consultation with the GLA.

Any revised Energy Strategy should include:

- a) A full feasibility assessment of the potential for construction of an enlarged energy centre at the development, offering the potential to supply heat to a wider district heat network and to serve other sites in the vicinity;
- b) Details of any central energy centre & heat network including, but not limited to any heat pumps to be installed at the premises.
- c) Evidence of how the development will be 'connection ready' for future connection to a District Heating System serving the local area or for extension of any network hereby approved to serve other developments in the vicinity."

REASON: In the interests of the sustainability and energy efficiency of the development and to meet the requirements of policy 5.2 of the London Plan (2015). In the interest of sustainability, energy efficiency and to provide a high quality development in accordance with Policy CS4 of the Waltham Forest Local Plan Core Strategy (2012) Policy DM10 of the Waltham Forest Local Plan Development Management Policies (2013).

Retention of Offices

50. The upper floors of the Civic building hereby permitted as general offices shall operate and be laid out and implemented in accordance with the approved plans and shall not be used for any other purpose.

REASON: To support the development of sustainable growth on non-designated employment and ensure the appropriate mix of uses in key growth areas in line with Policies DM1 and DM20 of the Waltham Forest Local Plan Development Management Policies (2013) and Policies CS8 and CS10 of the Waltham Forest Local Plan Core Strategy (2012).

Energy and Sustainability:

51. Prior to the occupation of any part of the development hereby permitted, a report demonstrating how the scheme reduces the carbon dioxide emissions of the development by at least 35% compared to the 2013 Building Regulations shall be submitted to, and approved in writing by, the Local Planning Authority. The report shall reference the measures set out in the Energy Statement accompanying the planning application but shall explain what measures have been implemented in the construction of the development. The development and energy efficiency measures shall thereafter be retained.

REASON: In the interest of sustainability, energy efficiency and to provide a high quality development in accordance with Policy CS4 of the Waltham Forest Local Plan Core Strategy (2012) and Policy DM10 of the Waltham Forest Local Plan Development Management Policies (2013).

BREEAM

52. The commercial floor space hereby permitted shall be constructed to achieve not less than BREEAM 'Very Good' in accordance with the submitted Energy Report (or the equivalent standard in such measure of sustainability for nonresidential building design which may replace that scheme). The commercial floor space shall not be occupied until formal certification has been issued confirming that not less than 'Very Good' has been achieved and this certification has been submitted to, and approved in writing by, the Local Planning Authority.

REASON: In the interest of sustainability, energy efficiency and to provide a high quality development in accordance with Policy CS4 of the Waltham Forest Local Plan Core Strategy (2012) and Policy DM10 of the Waltham Forest Local Plan Development Management Policies (2013).

Blinds

53. No development shall take place until internal blind details for specified residential units have been submitted to and approved in writing by the local planning authority. The blinds shall thereafter be retained, operated and maintained as approved.

REASON: To order to ensure any overheating would be minimised and to explore any other approaches to minimise overheating in accordance with Policy CS4 of the Waltham Forest Local Plan Core Strategy (2012) and Policy DM10 of the Waltham Forest Local Plan Development Management Policies (2013).

Commercial

54. Prior to first occupation of any of the non-residential component, details of the amount of floorspace per use class across the site shall be submitted to and approved in writing by the Local Planning Authority. Such details as approved shall be implemented in accordance with the approved plans and shall thereafter be maintained unless otherwise agreed in writing by the Local Planning Authority.

REASON: To ensure the scheme is delivered as proposed in accordance with Policies 3.5 and 7.3 of the London Plan (2016), Policies CS15 and CS16 of the Waltham Forest Local Plan Core Strategy (2012) and Policies DM29, DM32 and DM33 of the Waltham Forest Local Plan Development Management Policies (2013).

Phasing

55. Prior to commencement of development, details of a Phasing Strategy setting out the delivery of the phases across the whole site shall be submitted to and approved in writing by the Local Planning Authority. The Phasing Strategy shall confirm the order and timing of delivery of each of the phases.

REASON: To ensure the scheme is delivered as proposed in accordance with Policies 3.5 and 7.3 of the London Plan (2016), Policies CS15 and CS16 of the Waltham Forest Local Plan Core Strategy (2012) and Policies DM29, DM32 and DM33 of the Waltham Forest Local Plan Development Management Policies (2013).

Waste Management

56. Prior to first occupation of any part of the development hereby permitted, a Waste Management Strategy (for residential and nonresidential), which sets out a scheme for the storage and disposal of waste and recycling, including details of methods for collection and enclosures, shall be submitted to and approved in writing by the Local Planning Authority. The development shall be implemented in accordance with the approved details and the refuse stores brought into use prior to first occupation of any of the dwellings hereby permitted and shall be retained as such together with the approved Waste Management Strategy being operated for the lifetime of the development.

REASON: In the interests of highway and pedestrian safety in accordance with policies CS7 and CS15 of the Waltham Forest Local Plan Core Strategy (2012).

Water reduction

57. Prior to the commencement of development, a scheme detailing measures to reduce water use within the development, to meet a target water use of 105 litres or less per person, per day, shall be submitted to and approved in writing by the Local Planning Authority. The development shall be constructed in accordance with the approved scheme and thereafter retained.

REASON: To minimise the water use of the development, in accordance with the requirements of policy 5.15 of the London Plan (2015).

Surface Water Drainage

58. Prior to the construction of roof slab level, specifications of a surface water drainage system based on sustainable drainage principles to include details of design, implementation, adoption, maintenance and management shall be submitted to and approved in writing by the Local Planning Authority. The approved SUDS shall be fully implemented prior to first occupation of any building and thereafter maintained in accordance with the agreed details for the lifetime of the development.

REASON: To prevent the increased risk of flooding, both on- and off-site ensure that adequate drainage facilities are provided in accordance with policies CS4 and CS15 of the Waltham Forest Local Plan - WFLP Core Strategy (2012) and Policy DM34 of the Waltham Forest Local Plan – Development Management Policies (2013).

Thames Water Conditions

59. Development here by approved shall not commence – until an integrated water management strategy detailing, what infrastructure is required, where it is required, when it is required (phasing) and how it will be delivered, has been submitted to and approved by, the local planning authority in consultation with the water undertaker. The development shall be occupied in line with the recommendations of the strategy.

REASON - The development may lead to no water and or significant environment impacts an Integrated water management strategy is required to ensure that sufficient capacity is made available to cater for the new development; and in order to avoid adverse environmental impact upon the community, in the interest of future residents and to protect pollution of groundwater in accordance with Policies CS4 and CS13 of the Waltham Forest Local Plan Core Strategy (2012) and Policies DM23, DM24 and DM34 of the Waltham Forest Local Plan Development Management Policies (2013).

60. No properties shall be occupied until confirmation has been provided that either:- all water network upgrades required to accommodate the additional flows to serve the development have been completed; or - a housing and infrastructure phasing plan has been agreed with Thames Water to allow additional properties to be occupied. Where a housing and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed housing and infrastructure phasing plan.

REASON: The development may lead to no / low water pressure and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development, , in the interest of future residents and to protect pollution of groundwater in

accordance with Policies CS4 and CS13 of the Waltham Forest Local Plan Core Strategy (2012) and Policies DM23, DM24 and DM34 of the Waltham Forest Local Plan Development Management Policies (2013).

Informatives

1. To assist applicants the Local Planning Authority has produced policies and written guidance, all of which is available on the Council's website and which offers a pre planning application advice service. The scheme was submitted in accordance with guidance following pre application discussions and the decision was delivered in a timely manner.
2. Construction and demolition works audible beyond the boundary of the site should only be carried out between the hours of 0800 and 1800 hours Mondays to Fridays and 0800 and 1300 hours on Saturdays, and not at all on Sundays or Public/Bank Holidays.
3. The submitted Construction Environmental Management Plan shall include details of:
 - Site hoarding
 - Wheel washing
 - Dust suppression methods and kit to be used
 - Bonfire policy
 - Confirmation that all Non Road Mobile Machinery (NRMM) comply with the Non Road Mobile Machinery (Emission of Gaseous and Particulate Pollutants) Regulations 1999
 - Confirmation if a mobile crusher will be used on site and if so, a copy of the permit and indented dates of operation
 - Site plan identifying location of site entrance, exit, wheel washing, hoarding, dust suppression, location of water supplies and location of nearest neighbouring receptors
 - Copy of an asbestos survey.
 - Unexploded Ordnance Survey
4. The application is subject to both the Mayoral and the Waltham Forest Council Community Infrastructure Levy.
5. A phase of development relates to a phase defined by planning condition (CIL condition), or any subsequent construction sub-phase agreed with the Local Planning Authority.
6. Circular Economy - The applicant is required to submit a Post Completion Report to the relevant local authority and the GLA at ce&wastestatement@london.gov.uk.
7. Written schemes of investigation will need to be prepared and implemented by a suitably qualified professionally accredited archaeological practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London. This condition is exempt from deemed discharge under schedule 6 of The Town and Country Planning (Development Management Procedure) (England) Order 2015.
8. It is the developer's responsibility to ensure all signage associated with the proposed development i.e. street nameplates, building names and door numbers are erected prior to occupation, as agreed with the Councils Street Naming/Numbering Officer.
9. The LPA wishes that the rich history and prehistory of the site and its surroundings be conveyed to the public. The interpretation scheme should be researched and designed by

a recognised historical or archaeological interpretation specialist with appropriate experience

10. A detailed Quantitative Risk Assessment (DQRA) for controlled waters using the results of the site investigations with consideration of the hydrogeology of the site and the degree of any existing groundwater and surface water pollution should be carried out. This increased provision of information by the applicant reflects the potentially greater risk to the water environment. The DQRA report should be prepared by a 'competent person', e.g. a suitably qualified hydrogeologist.

In the absence of any applicable on-site data, an arrange of values should be used to calculate the sensitivity of the input parameter on the outcome of the risk assessment.

- GP3 version 1.1 August 2013 provided further guidance on setting compliance points sin DQRAs. This is now available as online guidance:

<https://www.gov.uk/guidance/land-contamination-groundwater-compliancepoints-quantitative-risk-assessments>

- Where groundwater has been impacted by contamination on site, the default compliance point for both Principal and Secondary aquifers is 50 metres.

Where leaching tests are used it is strongly recommended that BS ISO 18772:2008 is followed as a logical process to aid the selection and justification of appropriate tests based on a conceptual understanding of soil and contaminant properties, likely and works-case exposure conditions, leaching mechanisms, and study objectives. During risk assessment one should characterise the leaching behaviour of contaminated solid using an appropriate suite of tests. As a minimum, these tests should be:

- Up flow percolation column test, run to LS 2 – to derive kappa values;
- pH dependence test if pH shifts are realistically predicted with regard to soil properties and exposure scenario; and
- LS 2 batch test – to benchmark results of a simple compliance test against the final step of the column test.

Following the DQRA, a Remediation Options Appraisal to determine the Remediation Strategy in accordance with CRL 11.

The verification plan should include proposals for a groundwater-monitoring programme to encompass regular monitoring for a period before, during and after ground works. E.g. monthly monitoring before, during and for at least the first quarter after completion of ground works, and then quarterly for the remaining 9month period. The verification report should be undertaken in accordance with guidance **Verification of Remediation of Land Contamination:** <http://publications.environment-agency.gov.uk/pdf/SCHO0210BRXF-e-e.pdf>

11. **Piling works:** With respect to any proposals for piling through made ground, the EA refer the applicant to the EA guidance document "Piling and Penetrative Ground Improvement Methods on Land Affected by Contamination: Guidance on Pollution Prevention". NGWCL Centre Project NC/99/73. Approval of piling methodology should be further discussed with the EA when the guidance has been utilised to design appropriate piling regimes at the site. We will not permit piling activities on parts of a site where an unacceptable risk is posed to Controlled Waters. Considering the site sensitivity, a groundwater monitoring/sampling program should be implemented prior/ during and after piling works.

12. **Environmental Permitting Regulations:** The Environmental Permitting (England & Wales) Regulations 2016 make it an offence to cause or knowingly permit a groundwater activity unless authorised by an Environmental Permit which we will issue. A groundwater activity includes any discharge that will result in the input of pollutants to groundwater.
13. **Requirement for an Environmental Permit** As stated above, the infilling of the gasholder associated with this development will require an Environmental Permit from the Environment Agency, unless an exemption applies. The applicant is advised to contact the Environment Agency for further advice and to discuss the issues likely to be raised. You should be aware that there is no guarantee that a permit will be granted. **Groundwater protection** We would like to refer the applicant/enquirer to our groundwater position statements in 'The Environment Agency's approach to groundwater protection', available from gov.uk. This publication sets out our position for a wide range of activities and developments, including:
- Waste management
 - Discharge of liquid effluents
 - Land contamination
 - Ground source heat pumps
 - Drainage
14. **Waste on-site** The CL:AIRE Definition of Waste: Development Industry Code of Practice (version 2) provides operators with a framework for determining whether or not excavated material arising from site during remediation and/ or land development works are waste or have ceased to be waste. Under the Code of Practice:
- excavated materials that are recovered via a treatment operation can be reused on-site providing they are treated to a standard such that they fit for purpose and unlikely to cause pollution
 - treated materials can be transferred between sites as part of a hub and cluster project
 - some naturally occurring clean material can be transferred directly between sites

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically, and that the permitting status of any proposed on-site operations are clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays.

15. The EA recommends that developers should refer to:
- the position statement on the Definition of Waste: Development Industry Code of Practice
 - The waste management page on GOV.UK
16. **Waste to be taken off-site** Contaminated soil that is (or must be) disposed of is waste. Therefore, its handling, transport, treatment and disposal are subject to waste management legislation, which includes:
- Duty of Care Regulations 1991
 - Hazardous Waste (England and Wales) Regulations 2005
 - Environmental Permitting (England and Wales) Regulations 2016
 - The Waste (England and Wales) Regulations 2011

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically in line with British Standard BS EN 14899:2005 'Characterization of Waste - Sampling of Waste Materials - Framework for the Preparation and Application of a Sampling Plan' and that the permitting status of any proposed

treatment or disposal activity is clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays.

If the total quantity of hazardous waste material produced or taken off-site is 500kg or greater in any 12-month period, the developer will need to register with us as a hazardous waste producer. Refer to the hazardous waste pages on GOV.UK for more information.

17. For information on the NRMM Low Emission Zone requirements and to register NRMM, please visit "<http://nrmm.london/>".

18. The AQDMP can form part of the Construction Environmental Management Plan (CEMP). The AQDMP shall include the following for each relevant phase of work (demolition, earthworks, construction and trackout):

- a) A summary of work to be carried out;
- b) Proposed haul routes, location of site equipment including supply of water for damping down, source of water, drainage and enclosed areas to prevent contaminated water leaving the site;
- c) Inventory and timetable of all dust and NO_x air pollutant generating activities;
- d) List of all dust and emission control methods to be employed and how they relate to the Air Quality (Dust) Risk Assessment; e) Details of any fuel stored on-site;
- f) Details of a trained and responsible person on-site for air quality (with knowledge of pollution monitoring and control methods, and vehicle emissions);
- g) Summary of monitoring protocols and agreed procedure of notification to the local authority; and
- h) A log book for action taken in response to incidents or dust-causing episodes and the mitigation measure taken to remedy any harm caused, and measures employed to prevent a similar incident reoccurring.

Developments assessed to be medium risk or greater for any of the steps required in an Air Quality and Dust Risk Assessment (AQDRA) regular or continuous PM₁₀ monitoring should be carried out on site. Baseline monitoring should commence **3 months** before the commencement of works and continue throughout all construction phases. Details of the equipment to be used, its positioning, additional mitigation to be employed during high pollution episodes and a proposed alert system should be submitted to the Council for approval. No demolition or development shall commence until all necessary precommencement measures described in the AQDMP have been put in place and set out on site. The demolition and development shall thereafter be carried out and monitored in accordance with the details and measures approved in the AQDMP. The IAQM "Guidance on Air Quality Monitoring in the Vicinity of Demolition and Construction Sites" details appropriate monitoring for the scale of the site or project.

19. Air Quality

- ADMS-Roads input data and output files must be provided to LB of Waltham Forest on validation of the planning application.
- AQ modelling must be based on transport related inputs which have been approved by LB of Waltham Forest Transport Assessment team.
- It is essential that junctions and heavily congested roads are modelled accurately and this is reflected in the choice of relevant node spacing and vehicle speed inputs – clearly showing the node distance with speed reduction as the vehicle approaches the area of congestion/junction. This also applies to pedestrian crossings, roundabouts and any street layout which causes congestion such as single lanes with a bus stop.

- Where under predictions occur nodes must be scrutinised and where necessary vehicle speeds adjusted to reflect queuing.
 - It is the responsibility of the applicant to ensure that their appointed consultants' modelling verification is robust and adjustment factors clearly explained and justified, calculations and graphs must be provided at validation.
 - Margin of error must not exceed 4 (refer to LAQM guidance as best practice).
 - Contrary to the values given in the EPUK guidance a magnitude of change greater than 0.5 µg/m³ is considered significant in areas where present concentrations are approaching / breaching limit values and shall be assessed as such.
 - Any other scenarios should be considered which are relevant to this site.
20. The design of an odour control system needs to address two phases of contamination in any 'kitchen' exhaust; particulate (grease, smoke, hydrocarbons/VOCs) and gaseous (odour). The design requires an adequate level of particulate and odour control but also stack dispersion. Overall performance will be based on the arrestment plant and where the system discharges. As a rule, the more complicated the arrestment plant the more onerous the future maintenance (required to ensure it continues to work effectively).
21. Dispersion through stacks increases initial atmospheric mixing and spread. Stacks are inherently simple and in effect this simplicity provides a reliable and lower input method of mitigating odour with less maintenance and management. Well-designed stack dispersion can even allow for some short-term reduction in the performance of any odour abatement plant. For these reasons high-level dispersion is always advocated where practicable. Optimising stack height and dispersion arrangements should be one of the first design decisions.
22. Where suitable high-level dispersion is not possible a much higher level of odour abatement plant will be required; this is likely to be expensive and require a significant commitment to ongoing maintenance.
23. There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near our mains (within 3m) we'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The applicant is advised to read our guide [working near or diverting our pipes](https://developers.thameswater.co.uk/Developing-a-largesite/Planning-your-development/Working-near-or-diverting-our-pipes). <https://developers.thameswater.co.uk/Developing-a-largesite/Planning-your-development/Working-near-or-diverting-our-pipes>
24. The proposed development is located within 15m of our underground water assets and as such we would like the following informative attached to any approval granted. The proposed development is located within 15m of Thames Waters underground assets, as such the development could cause the assets to fail if appropriate measures are not taken. Please read our guide 'working near our assets' to ensure your workings are in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes>. Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk
25. If you are planning on using mains water for construction purposes, it's important you let Thames Water know before you start using it, to avoid potential fines for improper usage.

More information and how to apply can be found online at thameswater.co.uk/buildingwater.

26. Thames Water agree with a maximum pump rate for foul water of 6l/s.
27. The applicant must seek the advice of the Metropolitan Police Service Designing Out Crime Officers (DOCOs). The services of MPS DOCOs are available free of charge and can be contacted via docomailbox.ne@met.police.uk or 0208 217 3813.
28. You have been granted planning permission for a development in a flood risk area. We strongly advise that you sign up to the free Flood Warning Direct service.

Potential Existing Utility Services

29. The developer is responsible for a detailed services survey to locate the position, type of services, including buried services, in the vicinity of railway and development site. Any utility services identified shall be brought to the attention of Senior Asset Protection Engineer (SAPE) in Network Rail if they belong to railway assets. The SAPE will ascertain and specify what measures, including possible re-location and cost, along with any other asset protection measures shall be implemented by the developer.

Fencing

30. In view of the nature of the development, it is essential that the developer provide (at their own expense) and thereafter maintain a substantial, trespass proof fence along the development side of the existing boundary fence, to a minimum height of 1.8 metres. The 1.8m fencing should be adjacent to the railway boundary and the developer/applicant should make provision for its future maintenance and renewal without encroachment upon Network Rail land. Network Rail's existing fencing / wall must not be removed or damaged and at no point during or post construction should the foundations of the fencing or wall or any embankment therein, be damaged, undermined or compromised in any way. Any vegetation within Network Rail's land boundary must not be disturbed. Any fencing installed by the applicant must not prevent Network Rail from maintaining its own fencing/boundary treatment.

Plant & Materials

31. All operations, including the use of cranes or other mechanical plant working adjacent to Network Rail's property, must at all times be carried out in a "fail safe" manner such that in the event of mishandling, collapse or failure, no plant or materials are capable of falling within 4m of the boundary with Network Rail. Operation of mobile cranes should comply with CPA Good Practice Guide 'Requirements for Mobile Cranes Alongside Railways Controlled by Network Rail'. Operation of Tower Crane should also comply with CPA Good Practice Guide 'Requirements for Tower Cranes Alongside Railways Controlled by Network Rail'. Operation of Piling Rig should comply with Network Rail standard 'NR-L3-INI-CP0063 - Piling adjacent to the running line'.
32. The applicant / developer must provide all construction methodologies relating to works that may import risks onto the operational railway and potential disruption to railway services, the assets and the infrastructure for acceptance prior to commencing the works. All works must also be risk assessed to avoid disruptions to the operational railway.