

LONDON BOROUGH OF WALTHAM FOREST

Committee/Date:	Planning – 11 th January 2022
Application reference:	204029
Applicant:	c/o agent Miss Brie Foster
Location:	Land to the rear of 37 Wolsey Avenue, Walthamstow, E17 6RE
Proposed development:	Demolition of existing garages and erection of four self-contained two storey dwellings comprising of 3X2 bedroom dwellings and 1X3 bedroom dwelling with associated hard and soft landscaping works.
Wards affected:	William Morris
Appendices:	None.

1 RECOMMENDATION

1.1 Recommendation to GRANT planning permission under reference 204029 subject to conditions, informative and the completion of a S106 Legal Agreement with the following Heads of Terms:

- Highways: Car free development – Residents will not be eligible for a parking permit for any surrounding CPZ.
- Highways: S278 agreement for Highways Works.
- Highways: Conditions Survey

Legal Fees:

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

1.2 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 S106 agreement and to agree any minor amendments to the conditions or the S106 agreement on the terms set out above.

1.3 In the event that the S106 agreement is not completed within 12 weeks following the date of Planning Committee, the Assistant Director of Development Management and Building Control is hereby authorised to refuse the application, if appropriate. In the absence of this S106 agreement, the proposed development would not be able to deliver the residential development on the site.

2 REASONS REFERRED TO COMMITTEE

2.1 There is significant public interest with 7 letters of objection.

3 SITE AND SURROUNDINGS



Figure 1 Illustrates the application site outlined in red.

- 3.1 The application site is accessed via a vehicular access between Nos 37 and 41 on the southern side of Wolsey Avenue in the William Morris ward of Walthamstow which is a predominantly residential area. The application site is broadly rectangular in its shape and measures 670 SQM. The application site shares its northern boundary with the rear/side wall of the flatted development at No.37 Wolsey Avenue. The surrounding buildings are two storey residential buildings, some with converted loft spaces forming additional accommodation within the roof. Currently, vehicular and pedestrian access is provided by a cross over with a width of 3.8 metres.
- 3.2 It should be noted that there is a pedestrian right of access into the site for the residential block at No.37 to provide rear access to flats C and D and their communal amenity garden. This would be retained and improved as part of the current proposals.
- 3.3 The application site contains three detached single storey structures which have flat roof forms and are currently used as residential garages for parking vehicles/storage. The boundary treatment of the southern, eastern and western elevations of the site comprises of the rear garden fences of these neighbours. The walls of the garages/structures also form part of the boundary. The northern boundary of the site is the rear/side wall of No.37 Wolsey Avenue. The site is covered in hardstanding.
- 3.4 The application site has a PTAL rating of 2, however it is adjacent to sites with PTALS of 3 so is considered to have moderate accessibility to public transport. The application site is located in flood zone 1 and is at a very low risk of fluvial and surface water flooding. The application site has no protective designations and is not located within a conservation area. There are no trees within the site.

4 APPLICATION PROPOSAL

4.1 Planning permission is sought for the redevelopment of the land to the rear of 37 Wolsey Avenue which includes the demolition of the existing garages and the erection of 2X2 pairs of semi-detached dwellings. The proposed development includes a soft landscaping regime which includes soft landscaped front and rear gardens for each of the dwellings. Around the edge of No.37 a planting regime is also proposed. Hard landscaping includes permeable grey coloured paving to deal with any potential onsite flooding issues.

4.2 A schedule of accommodation is outlined below.

Unit Number	Total GIA SQM	Bedroom 1	Bedroom 2	Bedroom 3	Garden
1 (2b3p)	71.97	13 SQM	9.51 SQM	N/A	50.62 SQM
2 (2b3p)	71.97	13 SQM	9.51 SQM	N/A	50.13 SQM
3 (2b4p)	84.76	12.6 SQM	12.99 SQM	N/A	50.14 SQM
4 (3b5p)	116.31	9.21 SQM	15.5 SQM	13.81 SQM	108.51 SQM

4.3 The scheme as presented is proposed to be a car free development and would have a communal refuse and recycling store adjacent to the entrance into the site. Cycle stores are proposed to be within the private rear gardens. The bin storage allows for 3X240 L bins and 1X23 L food caddy per dwelling.

4.4 The proposed materials include: White facing brick, white brick header course, Anthracite grey RAL 7016 coloured doors, windows, and down water goods. Sedum roof is also proposed.

4.5 Amended plans were received during the course of the application that relate to the landscaping treatment of the site. Enlarged front gardens and areas of planting are now proposed as is planting to the northern boundary of the site.

4.6 The proposed works would remove vehicular access to the site and the site would be laid out with an enhanced landscaping regime. There is a rights of way access through the site which provides pedestrian access to the rear communal amenity garden for all the flats in No.37 Wolsey Avenue and Flats C & D. This would be retained as part of the development.

(Item 4.2)



Figure 1 Proposed site layout



Figure 2 3D Image of proposed site layout.

5 RELEVANT SITE HISTORY

A. Planning

- 5.1 **130925**-Erection of an additional floor to building with new pitched roof and four side dormers to form 1X2 bedroom flat and erection of external staircase at the rear. Refused
- 5.2 It should be noted that this refusal relates to the adjoining existing block at No.37 which is outside of the red line of the application site.

5.2 ENFORCEMENT

- 5.6 No enforcement history

6 PUBLIC CONSULTATIONS

- 6.1 During the course of the application, the Council received 7 letters of objections from nearby residents.
- 6.2 The representations relating to the issues of concerns raised are detailed in the table below and matters are also addressed within the "Assessment" section of this report.

Objection received	Response
Concerns with the design and appearance of the proposed building in addition to overdevelopment of the site.	<p>Officers are satisfied that the bulk and scale is appropriate within this site and the contemporary design would be sensitive with the existing context of the area. As such there would be no overdevelopment of the site.</p> <p>The Council's Design officers are supportive of the new and innovative design approach for this site.</p> <p>Full assessment of the design of the proposal is at section D of this report.</p>
Concerns with neighbouring amenity in terms of loss of light, loss of privacy and security.	<p>Officers consider that the proposed development, on balance would retain satisfactory living conditions for all adjoining neighbouring properties. Overshadowing to a garden area on its own will rarely constitute sufficient grounds to justify a refusal of permission.</p> <p>Full assessment of the design of the</p>

	proposal is at is at section E of this report.
Impacts on neighbouring residential amenity with regards to the existing development at No.37 with regards to overlooking and loss of privacy	All front facing windows are proposed to be obscure glazed. As such, there would be no overlooking towards neighbouring properties within the flatted block number 37 through the windows
Concerns with parking pressures	<p>The additional dwellings would not be eligible for parking permits for any surrounding CPZ.</p> <p>If planning permission is granted, the Applicant would be required to enter into a s106 agreement to restrict parking permits for future occupants.</p> <p>A full assessment of parking issues is discussed at section I of this report.</p> <p>In terms of unrestricted parking outside the CPZ hours, all Controlled Parking Zones are reviewed regularly and the CPZ hours can be extended if necessary.</p>
Concerns with noise, dust and disturbance during the construction phase.	<p>The proposal is for residential use, which would be compatible with other residential land uses in the area. The increased number of residents is unlikely to result in unacceptable level of noise.</p> <p>In terms of noise from the construction works, a planning condition is recommended to be included as part of any consent to ensure that the developers adhere to the hours of working and to minimise noise and disturbance within the area.</p> <p>In terms of dust and asbestos, the Council's contaminated land officer has requested that a scheme of mitigation appropriate for the proposed use should be implemented.</p>

	Full assessment of neighbouring amenity noise impact is set out at in sections I and K of this report.
Rights of way/unobstructed access	The rights of way for the existing residents of 37 Wolsey Avenue are proposed to be retained for the residents.

7 OTHER CONSULTATIONS

Consultees	Response
Design and Conservation	Supports the proposal.
Sustainable Energy	No objection subject to the following conditions: <ul style="list-style-type: none"> ➤ a 35% on-site CO2 reduction will be achieved.
Transport Planning	No comment.
Highways	No objection subject to the following: <ul style="list-style-type: none"> ➤ Car free development ➤ S278 Agreement ➤ Conditions Survey ➤ Financial contribution of £500 for the monitoring of the Construction Logistics Plan
Environmental Health	➤ No objections subject to conditions requested.
Contaminated Land	No objection to the proposal subject to the imposition of conditions where justified.

8 DEVELOPMENT PLAN

National Planning Policy Framework (2021)

- 8.1 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.

- 8.2 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"*.
- 8.3 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.
- 8.4 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
 - Conserving and enhancing the historic environment
 - Promoting sustainable transport
 - Making effective use of land
 - Achieve well-designed places
 - Delivering a wide choice of high-quality homes

The London Plan (2021)

- 8.5 On Tuesday 2nd March 2021 The Mayor of London published the replacement London Plan. From this date it forms part of the Development Plan for the purpose of determining planning applications. The 2021 London Plan supersedes the 2016 London Plan, which no longer has any effect.
- 8.6 The policies relevant to this application are considered to include and not limited to:
- 8.7 The relevant policies within the London Plan 2021 are:
- GG1 Building strong and inclusive communities
 - GG2 Making best use of land
 - GG3 Creating a healthy city
 - GG4 Delivering the homes Londoners need
 - GG6 Increasing efficiency and resilience
 - D1 London's form, character, and capacity for growth
 - 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
D12 Fire safety
D14 Noise
H1 Increasing housing supply
H2 Small sites
H10 Housing size mix
E4 Land for industry, logistics and services to support London's economic function
E7 Industrial intensification, co-location, and substitution
G1 Green infrastructure
G5 Urban greening
G6 Biodiversity and access to nature
SI 2 Minimising greenhouse gas emissions
S1 13 Sustainable drainage
T1 Strategic approach to transport
T3 Transport capacity, connectivity and safeguarding
T4 Assessing and mitigating transport impacts
T5 Cycling
T6 Car parking
T6.1 Residential parking
T7 Deliveries, servicing, and construction
T9 Funding transport infrastructure through planning
DF1 Delivery of the Plan and Planning Obligations

Waltham Forest Local Plan Core Strategy (2012)

- 8.8 The Waltham Forest Core Strategy (2012) was adopted on 1st March 2012.
- 8.9 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.
- 8.10 The policies considered relevant to this application are as follows:
- CS1: Location and Management Growth

- CS2: Improving Housing Quality and Choice
- CS3: Providing Infrastructure
- CS4: Climate Change
- CS6: Promoting Sustainable Waste Management and Recycling
- CS7: Developing Sustainable Transport
- CS12: Protecting and Enhancing Heritage
- 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)

8.11 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. The following policies are relevant in this case:

- DM1- Sustainable Development and Mixed-Use Development
- DM2- Meeting Housing Targets
- DM5 - Housing Mix
- DM7 - External Amenity and Internal Space Standards
- DM13 - Co-ordinating Land use and Transport
- DM14 - Sustainable Transport Network
- DM15 - Managing Private Motorised Transport
- DM16 - Parking
- DM24 - Environmental Protection
- DM29 - Design Principles, Standards and Local Distinctiveness
- DM30 - Inclusive Design and the Built Environment
- DM32 - Managing Impact of Development on Occupiers and Neighbours
- DM33 - Improving Community Safety
- DM34 - Water

9 MATERIAL PLANNING CONSIDERATIONS

Other Material Considerations

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

9.1 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. It has now been 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.

- 9.2** 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.
- 9.3** 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).

Policy 56 Delivering High Quality Design

Policy 58 Residential Space Standards

Policy 59 Amenity

Policy 68 Managing Vehicle Traffic

Policy 81 Biodiversity and Geodiversity

Epping Forest Special Area of Conservation

- 9.4** Natural England issued an Interim Advice Letter on 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.
- 9.5** 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 Zone of Influence (ZOI) based on the distance the majority of 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 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’.
- 9.6** 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.
- 9.7** 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.

- 9.8** For schemes of 99 units or less, an initial draft of costed Strategic Access Management Measures (SAMM) 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 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.
- 9.9** For applications received after 1st April 2019 a SAMM levy is requested for all new residential developments of 10 units or more to contribute towards the Epping Forest mitigation. This is calculated at £100 per unit. The SAMM levy is not being sought for schemes of less than 10 units as the administrative costs are greater than the amount collected. Natural England is supportive of this approach, provided the total expected contribution is delivered.

Other Material considerations

- Supplementary Planning Document Urban Design (2010)
- The London Plan, Supplementary Planning Guidance – Housing (2016)
- Department for Communities and Local Government Technical housing standard – nationally described space standard (2015).
- Waste & Recycling Guidance for Developers (2019)
- Supplementary Planning Document Revised Planning Obligations (2017)

Local Finance Considerations

- 9.10** 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 no 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 for consideration, in relation to the proposed development are as follows:
- A.** Principle of Development
 - B.** Dwelling Mix

- C. Density
- D. Urban Design
- E. Living Conditions - Existing occupiers
- F. Living Conditions - Future occupiers
- G. Biodiversity
- H. Secure by Design
- I. Highway and Transport Impact
- J. Waste Management
- K. Environment and Sustainable Design
- L. Planning Obligations

A. The Principle of Development

- 10.2 The London Plan 2021 identifies the urgent need to increase housing supply in London to address the substantial population increase in the capital. The London Plan identifies a ten year housing target of at least 522,870 new homes. The proposed development would contribute towards the provision of new housing, in line with the aspirations of the London Plan. There is a pressing need for Waltham Forest to deliver additional new homes.
- 10.3 The new London Plan requires Waltham Forest to deliver 12,640 new homes over the ten year period. National London and Local plan policies all seek to encourage sustainable housing development on appropriate sites in urban areas. In particular Policy CS2 of the Waltham Forest Local Plan Core strategy identifies the need to prioritise development on previously developed or underused land and optimise housing densities.
- 10.4 London Plan Policy H2 encourages boroughs to proactively support well designed new homes on small sites to ensure that such sites significantly increase the contribution of small sites to meeting London's housing needs.
- 10.5 The site is an anomaly within the surrounding area. The surrounding area is predominantly residential in nature, characterised by two storey terraced and semi-detached dwellings. The site comprises of underused garages in a moderate condition. The site currently suffers from anti-social behaviour and such related activities.
- 10.6 In terms of the proposed change of use of the site from the garages to residential, Policy CS2 of the Waltham Forest Local Plan Core Strategy aims to maximise the number of quality homes with emphasis on family housing on previously developed or underused land and optimise housing densities. Policy H2 of the London Plan states that boroughs should pro-actively support well-designed new homes on small sites.

- 10.7 The proposed development would result in the loss of garages on the site. However these are older style domestic residential garages and are not used for any employment purposes. Local Plan DM16 states that the Council will seek to encourage car free and car capped developments and to help reduce parking provision. In this instance, the development would be car free and the loss of the garages on the site are considered acceptable in this instance.
- 10.8 The proposal would result in a net gain of 2 larger family sized dwellings and 2 smaller sized units with private amenity space within a predominantly residential area. The development is considered to be of a high quality design and would be constructed from high quality materials and would enhance the character and appearance of the wider area. An improved biodiversity regime has been implemented with an enhanced urban greening. As such, the principle of the redevelopment of the site is therefore not objected to. Given the context of the immediate area, the proposed land use would be compatible with neighbouring land uses.
- 10.9 Overall, the provision of new residential units would contribute towards housing targets and accord with Policies CS2 and CS8 of the Local Plan Core Strategy (2012), Policy DM20 of the Development Management Policies (2013) and Policy H2 of the London Plan.

B. Dwelling Mix

- 10.10 Policy CS2 of the Core Strategy 'prioritises the need for larger homes (three bedroom or more)' and Policy DM5 of the Development Management Policies 'generally does not support development proposals containing only smaller homes (one and two bed)'. The Council's preferred housing mix is illustrated in table 6.1 (below).

No. Bed Rooms	1 bed (2 person)	2 bed (4 person)	3 bed (5/6 person)	4 bed + (7/8 person)
Market	20%	30%	40%	10%
Intermediate Affordable Housing	20%	40%	30%	10%
Social/Affordable Rented Housing	20%	30%	40%	10%

Table 6.1 - Preferred Housing Mix

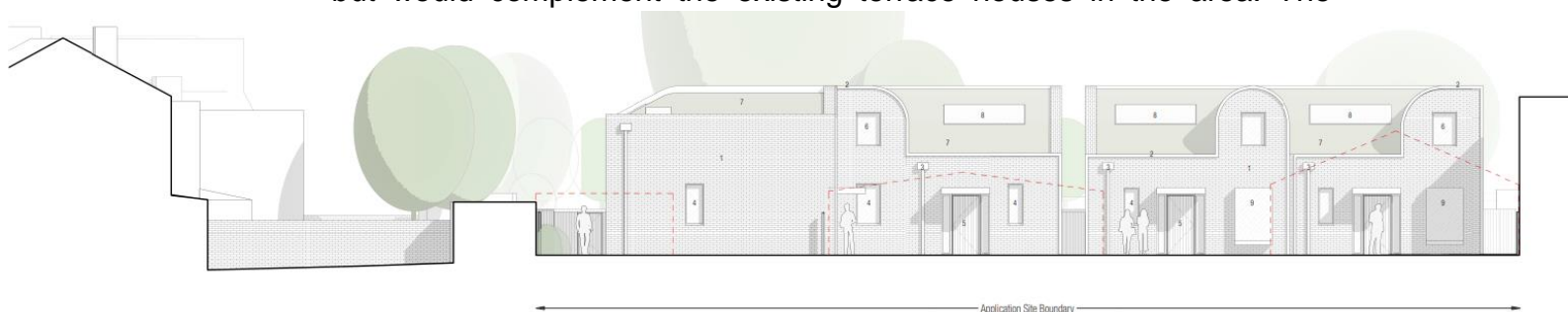
- 10.11 The proposed mix of units within the development is outlined within the below table:

Unit Mix	Number of units proposed	% of Total
2-bedroom units	3	75%
3-bedroom units	1	25%

- 10.12 The Council aims to ensure each residential development contributes to the creation of mixed and balanced communities by containing a mix of large and small homes overall.
- 10.13 The proposed dwelling mix is not fully compliant with the Council's preferred housing mix in table 6.1. However, it is considered that given the immediate area surrounding the site comprises a high number of single-family dwelling houses of different sizes the proposed mix would contribute to providing a variety of housing on offer in the area. The site is also a brownfield redevelopment of a site and introduces a residential development on a former non-residential site. Therefore, the proposed unit mix would be considered acceptable given the context of the site, in line with Policy DM5 of the Waltham Forest Local Plan Development Management Policies (2013).
- 10.14 In light of this, the proposed unit mix would be considered acceptable given the context of the site, in line with Policy DM5 of the Waltham Forest Local Plan Development Management Policies (2013) and Policy CS2 of the Core Strategy.

C. Urban Design

- 10.15 The Waltham Forest Local Plan policies CS15 and DM29 state that new developments will be expected to ensure the highest quality architecture and urban design and that they should reinforce and/or enhance local character and distinctiveness, taking account of patterns of development, urban form, and building typology.
- 10.16 The surrounding area is characterised with medium density two storey semi-detached and terraced housing with private rear gardens. Architecturally, Wolsey Avenue are made up of a continuous façade with vertical emphasis with architectural detailing primarily consisting of single storey bay windows. The street is lined with tree planting at regular intervals which helps to green the street.
- 10.17 The proposed buildings would not be widely visible from the public realm and would be set back well within the application site. Part of the first dwelling may be visible from the public highway. However the resultant development would be subordinate in scale to the adjacent two storey rows of terrace buildings. The building would be set back from the other nearby buildings and visually the proposed dwellings would not compete but would complement the existing terrace houses in the area. The



proposed buildings would have a semi-stepped front façade, with the first floor set back and as such this helps to reduce the bulk and mass of the development and results in a subservient form of development which is considered acceptable in this location.

Figure 2: Views looking towards the south elevation of the application proposal

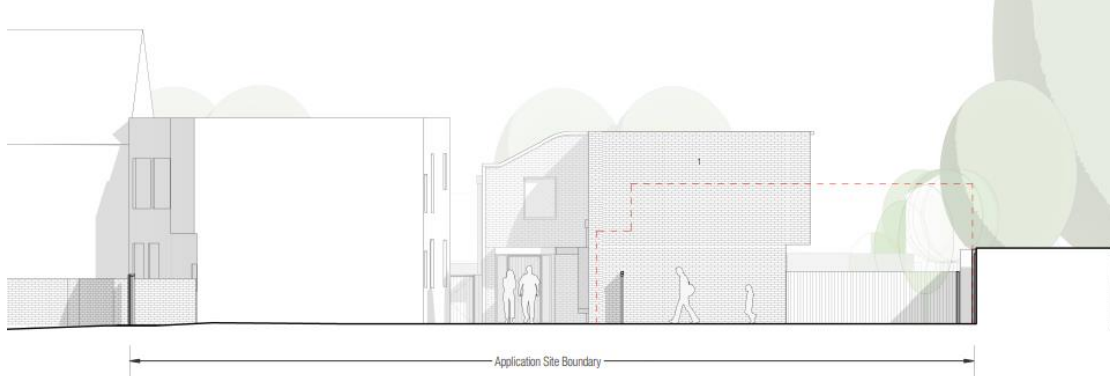


Figure 3: Views looking towards the eastern side of the application site.

- 10.18 Architecturally, the proposed buildings would have a contemporary and simple appearance with a well appointed front façade and proportioned and positioned front and rear facing windows. The material palette in the surrounding area comprises of London stock finish brick and white coloured render. The proposal includes white coloured bricks which would provide the texture of bricks but the visual appearance of a rendered building which would result in a modern appearance that would be complementary to the surrounding buildings. The proposal includes a Sedum green roof, whilst this is not a common roofing material within the surrounding area, it would be a high quality design which has other additional biodiversity benefits and visually would be acceptable.
- 10.19 Whilst the proposed materials are considered appropriate in this location, product specifications have not been provided and as such, a condition is recommended to ensure these materials are submitted and approved by the LPA to ensure they would be in keeping with its context. Considering all the points above, the proposal would be considered compliant with local plan policies CS15 and DM29.
- 10.20 The building would have minimal views from the main road and its modern design approach is acceptable in its setting. The scheme includes a landscape strategy for the site which would enhance the biodiversity of the site, which currently is covered in hardstanding. The scheme would not impact on the existing street scene and would create new natural landscape features around the perimeter of the site alongside residential boundaries with adjacent buildings. As such, the application proposal will make a positive contribution to the environment by managing and maintaining the site which has deteriorated over the years and make a positive contribution to the character of the landscape and the environmental quality of the area.

- 10.21 In summary the proposed development, given the design, layout, height, scale, materials and contribution to the biodiversity of the proposal would be acceptable within the existing urban form in the vicinity and the wider locality in accordance with policies D1, D3, D4, D5, D8 G1 and G5 of the London Plan 2021, policy CS15 of the Waltham Forest Local Plan Core Strategy (2012) and policy DM29 of the Development Management Policies (2013).

D. Living Conditions - Adjoining neighbours

- 10.22 Planning policies are designed to protect the living conditions of nearby residential occupiers. They aim to manage impact of new development and ensure that the living conditions of existing residents are not adversely affected as a result of the following:
- i) loss of daylight and sunlight to primary habitable windows such as living rooms, bedrooms and kitchen over 13 sq.m.
 - ii) outlook as a consequence of increased sense of enclosure
 - iii) privacy as a result of an intrusive, direct and uninterrupted view from a main room, to bedrooms, living rooms, dining rooms, or
 - iv) excessive noise as a result of intensified land use.
- 10.23 The Urban Design SPD 2010 provides design advice on minimising development impacts on nearby residential occupiers. The guidance most relevant to this application proposal is listed below:
- i) Paragraph 5. 9. 1 - As a general rule the Council will normally expect a minimum of 12m clearance between the window of a habitable room and the blank flank wall of an opposing two storey building.
 - ii) Paragraph 5. 9. 2 - Recommended separation distances between the windows of habitable rooms and kitchens in opposing dwellings must be
 - 20 m between two-storey dwellings, • 30 m between dwellings with a maximum height of three storeys,
 - iii) Paragraph 5. 9. 2 - Independently of the minimum separation distances between buildings, new developments with habitable rooms overlooking existing private gardens will generally need to be set back 5m per storey from the common boundary.
- 10.24 Its noteworthy, the Council recognises that a 'blanket' approach to the adoption of these standards can sometimes result in the creation of unattractive residential environments by denying the ability to provide privacy through careful design. In addition the more recent Mayor's Housing SPG minimum separation distances of 18 – 21m are useful yardsticks for visual privacy, but adhering rigidly to them can limit the variety of urban spaces and housing types and can sometimes unnecessarily restrict density. As a result, the above criteria will be applied flexibly in relation to the specific context of proposed development and in recognising that the objective of privacy can often be better secured through careful and imaginative detailed design rather than physical separation alone.

i) Daylight and sunlight

- 10.25 The application is accompanied by a daylight sunlight impact assessment completed by BVP Chartered Building Surveyors. The applicant has used two measures of diffuse daylight (Vertical Sky Component (VSC); and, Average Daylight Factor (ADF)), and one measure of sunlight (Annual Probable Sunlight Hours) to determine the impact of the proposed development on adjacent occupiers.
- 10.26 The methodology behind these assessments together with clarification of the findings is set out under the corresponding sections below.

Daylight

- 10.27 In terms of daylight, Vertical Sky Component (VSC) represents the amount of visible sky that can be seen from that reference point, from over and around any obstruction in front of the window. The amount of daylight within the building may be adversely affected if either: (a) the vertical sky component measured at the centre of an existing main window is less than 27%, and less than 0.8 times its former value; or (b) the area of the working plane in a room which can receive direct skylight is reduced to less than 0.8 times its former value.
- 10.28 The Average Daylight Factor (ADF) calculation which assesses the quality and distribution of light within a room served by a window and takes into account the VSC value, the size and number of the windows and the use to which the room is put. In housing, the BRE guide and BS 8206-2 recommends minimum values of ADF of 2% for kitchens, 1.5% for living rooms and 1% for bedrooms.
- 10.29 Furthermore, the BRE Guide states *“If any part of a new building or extension, measured in a vertical section perpendicular to a main window wall of an existing building, from the centre of the lowest window, subtends an angle of more than 25o to the horizontal, then the diffused daylighting of the existing building may be adversely affected. This will be the case if the Vertical Sky Component measured at the centre of an existing main window is less than 27% and less than 0.8 times its former value”*.
- 10.30 The daylight section of the report assessed the impact on 37 and 41 Wolsey Avenue. Four of the windows would experience a reductions greater than 0.8 of their former value. The Mayor’s Housing SPG advises that BRE guidelines should be applied sensitively to higher density development in London and quantative standards should not be applied rigidly. In all cases the retained VSC is greater than 20% and the reduction is up to 0.66 of the former value, which is considered acceptable in the context of the Mayor’s guidance.

Sunlight

- 10.31 In terms of sunlight, Annual Probable Sunlight Hours (APSH) method is a measure of sunlight that a given window may expect over a year period. The BRE guidance recognises that sunlight is less important than daylight in the amenity of a room and is heavily influenced by orientation. North facing windows may receive sunlight on only a handful of

occasions in a year, and windows facing eastwards or westwards will only receive sunlight for some of the day. Therefore, BRE guidance states that only windows with an orientation within 90 degrees of south need be assessed.

- 10.32 If a living room of an existing dwelling has a main window facing within 90 degrees of due south, and any part of a new development subtends an angle of more than 25 degrees to the horizontal measured from the centre of the window in a vertical section perpendicular to the window, then the sun lighting of the existing dwelling may be adversely affected. This will be the case if a point at the centre of the window, in the plane of the inner window wall, receives in the year less than one quarter of annual probable sunlight hours including at least 5% of annual probable sunlight hours between 21 September and 21 March and less than 0.8 times its former sunlight hours during either period.
- 10.33 All of the windows tested are within the rear and side elevation of No.37 and these are all north facing windows. As these windows are north facing, in accordance with the BRE guidance, these windows did not need to be assessed. However, an assessment was made in the Environmental Economics Daylight and Sunlight report. The report concludes that all of the 14 windows on the rear elevation of No.37 surpass the BRE guidelines in terms of windows and the rooms receiving Annual Probable Sunlight Hours.

Overshadowing

- 10.34 The closest neighbouring gardens to the north and east of the site have been analysed in the Daylight/Sunlight Impact assessment submitted with the application. The overshadowing section of the report concludes that sunlight across the rear garden at 37 Wolsey Avenue falls from 70.17% of the garden area receiving at least two hours of sunlight on the 21 March in the existing condition to 69.02% in the proposed condition. BRE states that an adverse effect would only occur when the proposed area is reduced to less than 0.8 its former value. In this location the proposal would retain at least 0.8 times the former value and as such is considered acceptable in relation to the guidance outlined in the BRE guidance.
- 10.35 In summary, given the proposed site layout, scale and mass the proposal is considered to have an acceptable impact on neighbouring residential amenity and would accord with Local Plan DM30.

ii) Outlook



Figure 3 site layout

- 10.36 The proposed development would be visible from the rear and side facing windows of 37 Wolsey Avenue and would be positioned at ground floor 5m away from the rear wall of this neighbour and at first floor this degree of separation increased to 6.5m at first floor. However, the positioning of the building is not considered to result in undue harm to the level of outlook from the neighbouring windows at No.37. Given the first floor set back, it reduces the overall bulk and massing of the development and as such would have an acceptable impact. The proposal also would result in an improvement to the site's current arrangements. The proposal seeks to re-landscape this area of hard landscaping with the inclusion of soft landscaping around the boundaries of the front of the buildings would help to soften the appearance of the buildings and introduces an element of greening in an area
- 10.37 The outlook from the nearest dwellings would change because of the development proposed but, change does not necessarily equate to material harm. Existing views to the proposed development from the rear gardens of properties on adjacent roads would be of the uppermost section of the 2-storey above ground development. These views would be through existing vegetation and proposed landscaping. The proposal is most definitely an improvement to the site's current arrangements. Furthermore, the inclusion of landscaping along the boundaries of the site would soften the appearance of the buildings. In conclusion, it is considered that despite bringing the building line closer to the existing

dwellings, the level of outlook would be improved and given modest height of the buildings the majority of the windows would still benefit from a vertical outlook towards the sky.

- 10.38 With regards to other neighbouring properties the development would be positioned 44m away from its nearest neighbours along Melville Road and 20m away from the rear elevation of its nearest neighbours along Greenleaf Road. This spatial separation is considered to be significant distance to ensure the proposal does not result in harm to the outlook of these properties.
- 10.39 The nearest part of the proposal is set some 14m away from the rear elevation of No.41 Wolsey Avenue. However, the outlook would not be harmed. This neighbour's outlook looking straight from the rear windows would be over this neighbour's garden and would not be towards the application site. As such, there would be no harm to this neighbour in relation to outlook and as such would accord with local plan policy DM32.

iii) Privacy

- 10.40 In terms of privacy, on the three properties facing No.37 Wolsey Avenue, the windows on the front elevation are proposed to be obscure glazed and would not be positioned to be directly facing the windows of No.37. As such, there would be no loss of privacy for these neighbours.
- 10.41 With regards to the neighbouring properties to the south of the site along Melville Road, the proposed buildings would not cause a loss of privacy. Whilst the rear habitable windows would face towards these properties, there is a 44m degree of separation between the two windows and as such, this is considered an appropriate distance to ensure that the proposal causes no adverse harm on neighbouring amenity.
- 10.42 With regards to neighbouring properties on Greenleaf Road, there would be a degree of separation of 20m. The guidance outlined in the Supplementary Planning Document Urban Design adopted in 2010 states that there should be a minimum distance of 20m between facing habitable windows for two storey buildings. As such, the proposal would comply the Council's guidance and would not result in undue harm on neighbouring amenity
- 10.43** With regards to No.41 Wolsey Avenue, the proposed windows would be 12m away from the rear elevation of this neighbour, however the proposed building would not have a front to back distance of 12m. The views from the new dwelling would be oblique at best and given the spatial relationship between the two properties, there would be no harm to the residential amenities of this neighbour.

Privacy and Pedestrian Movements

- 10.44 The proposed landscaping and site layout of the development is considered to result in an improved movement of pedestrians within the site. Currently users within the site have an uninterrupted view into the residents windows of No.37 of the ground floor units. The proposed site layout would include planting along the boundary with No.37. This would act as a buffer and an area of defensible space. This would direct

pedestrian movements away from the windows towards the centre of the site. Given the proposed site layout it is considered that there would be no significant loss of privacy to the ground floor units caused by the development.

iv) Noise & Disturbance

- 10.45 The proposed development would increase the level of occupation of the site with up to 15 new residents. However, the application site is situated within a residential location within an urban location. As such, the proposal for further residential development of an acceptable density is not considered to cause any further noise and disturbance issues in addition to those already experienced with living on a busy residential road.
- 10.46 Overall, in light of the above, it is considered that the proposal would not significantly harm the amenity of neighbouring occupiers in excessive noise nuisance. As such the proposal complies with policy DM 32 and CS13.

E. Living Conditions - Future occupiers

- 10.47 London Plan Policy D6 relating to Quality and Design of Housing Developments states that housing developments should be of the highest quality internally, externally and in relation to their context and to the wider environment.
- 10.48 There are three aspects to this issue, firstly the level of internal space that would be provided within the proposed dwelling, secondly, the level of private external amenity space, and thirdly the quality of the internal environment for the future occupiers.

i) Internal Space Standards

- 10.49 Policy CS2 of the Local Plan states that all new residential units will be required to be of a high quality and design. To ensure that good quality homes are built, to create a suitable and sustainable living environment for present and future generations and to mitigate against the adverse effects of overcrowding Policy DM7 of the Local Plan and London Plan 2021 Policy D6 sets out the required minimum internal standards for new residential units. The table below demonstrates that all units would meet the minimum internal space standard.

Dwelling Type	Proposed Space Standards, GIA (sq. metres/m2)	London Plan Required Space standards GIA (sq. metres/m2)(per dwelling)	Proposed Space standards/against London Standards
Unit 1. 2 storeys. 2 bed 3 person	71.97m2	70m2	Complies
Unit 2. 2 storeys. 2 bed 3 person	71.97m2	70m2	Complies

Unit 3. 2 storeys. 2 bed 4 person	84.76m²	79m ²	Complies
Unit 4. 2 storeys 3 bed 5 person	116m²	93m ²	Complies

- 10.50 The London Plan policy also requires that a single bedroom has a floor area of at least 7.5m² and a double (or twin bedroom) has a floor area of at least 11.5m²; the proposed development meets these bedroom space requirements.
- 10.51 In terms of internal head height, the nationally described space standard sets a minimum ceiling height of 2.3 metres for at least 75% of the gross internal area of the dwelling. To address the unique heat island effect of London and the distinct density and flatted nature of most of its residential development, a minimum ceiling height of 2.5m for at least 75% of the gross internal area is strongly encouraged so that new housing is of adequate quality, especially in terms of light, ventilation and sense of space. The residential units would achieve the minimum floor to ceiling heights of 2.5m.
- 10.52 As such, the proposal would be considered acceptable in accordance with the requirements of policy DM30 of the Local Plan (2013).

II) Outlook, daylight and privacy

- 10.53 The dwellings at units 1-3 would be afforded with windows facing the front and the rear of the properties which allow for efficient air flow and would therefore provide a dual aspect accommodation in that regard. To protect the privacy of the future occupiers, all front facing windows are obscure glazed. However, at first floor these serve non habitable spaces and at ground floor it serves a dual aspect living space so would provide adequate light levels. The habitable rooms all face to the rear with outlook over the rear garden which is considered acceptable.
- 10.54 At unit four, the front facing windows would overlook the front courtyard space and are proposed to be clear glazed. This unit would be double aspect and would be afforded with adequate levels of outlook, daylight and privacy.

III) External Private Amenity space

- 10.55 The Council is committed to ensuring that external amenity space is an integral part of the design. It is important to ensure that all new residential development provides an appropriate minimum amount of outdoor amenity space, 1) to meet the needs of residents, and 2) to ensure that the space is of a suitable qualitative standard that allows for a variety of amenity space functions. The external amenity space should be well-designed, appropriately located and usable.
- 10.56 External amenity space should not be steeply sloping, awkwardly shaped or very narrow. Furthermore, where communal external amenity space is proposed, this should be easily accessible by all residents of that development.

- 10.57 In terms of amenity space standards, Waltham Forest Development Management Policy DM7 states for up to 2 bedroom houses a minimum of 50 SQM should be provided and those containing three bedrooms should have a minimum of 60 SQM. In this instance, the two bedroom dwellings achieve 50 SQM and comply with the standard whilst the three bedroom unit exceeds 100 SQM. As such, the proposals provide adequate private outdoor amenity space serving the development.
- 10.58 As such, the level of amenity space provided is considered in this case to be acceptable; and as such the development would be acceptable in line with the requirements of policy CS13 and DM7 of the Local Plan.

IV) Accessibility

- 10.65 In order to meet the requirements of London Plan (2021) Policy D7 all the dwellings should meet Building Regulation M4(2) accessible and adaptable dwellings. A condition is recommended to secure this.
- 10.67 The proposed scheme is car free, therefore no accessible car parking spaces are proposed. However, the proposed landscaping enables wheelchair movement whilst entrances would have a level landing. As such, the proposed would subject to the condition, be considered acceptable in accordance with the requirements of Policy DM30 of the Development Management Policies (2013).

G Biodiversity

- 10.68 In terms of Biodiversity and Geodiversity Policy DM35 of the Development Management Policies (2013) advises that A) Development proposals will not normally be granted planning permission where they pose adverse direct or indirect effects on any land or area within the identified Sites of Special Scientific Interest (SSSI), Sites of Importance to Nature Conservation (SINC), Special Areas of Conservation (SAC), RAMSAR sites, Special Protection Areas (See Schedules 13 to 16 and 24 to 26 and the Policies Map) or to protected or priority species.
- 10.69 The site does not fall within any of the above designations. It is currently covered with buildings and hardstanding that is used for parking and is not of amenity value to the local community
- 10.70 Under this application the provision of front and rear gardens, living roofs and additional planting within the communal amenity area is provided. Officers consider that the proposal will contribute positively towards improved air quality and biodiversity whilst managing rainwater and creating sustainable communities.
- 10.71 SuDs planning condition is recommended in the interest of local amenity and to ensure that improved discharge rates are achieved, helping to reducing the impact of rainwater flooding. In line with policy SI 13 of the London Plan the SuDs should aim to achieve greenfield run-off rates..
- 10.72 In light of the above, the proposal would make a positive contribution to the environmental quality of the area. The inclusion of landscaping conditions in the decision notice would provide an effective method to

manage and improve the quality of existing and proposed vegetation on site. As such it is considered that the proposal satisfies the requirements of Policy DM35 and shall be conditioned with a planting regime.

H Secure by Design

- 10.73 Policy DM33 (Improving Community Safety) together with Core Strategy Policy DM16 aim to ensure that Waltham Forest is a safer and more inclusive space to live, work and visit and the fear of crime no longer reduces the quality of people's lives.
- 10.74 The Metropolitan Police Secure by Design Officer did not submit comments in relation to this proposal.
- 10.75 A condition is recommended to ensure that the proposed development achieves a Certificate of Compliance to the relevant Secure by Design Guide(s) or alternatively achieve Crime Prevention Standards. The reason for this condition is to protect the amenities of future and adjoining properties from in accordance with Policy CS16 and DM33 of the Local Plan.

I Highways and Transport Impact

- 10.76 Policy DM14 (Sustainable Transport Network) together with CS7 (Developing sustainable Transport) aims to actively encourage sustainable travel. New development proposals should contribute to a well-connected network of streets that optimises permeability and legibility. Developments should not have a harmful impact on the walking and cycling environment.
 - (i) *Car Parking*
- 10.77 Local Plan policy DM16 states that the Council would seek to effectively manage parking by encouraging car-free and car-capped development in locations that have high levels of parking stress. Adding that in car-free and car-capped developments, the Council would limit on-site car parking for developments to spaces designed for disabled people and operational and service needs; and by the introduction of controlled parking zones (CPZ) in the vicinity of the development.
- 10.78 The site falls within an existing CPZ. Local Plan policy DM16 aims to reduce car dependency, accordingly, the future occupants of the proposed residential units would not be entitled to residents parking permits. Furthermore, the Council's Highways team reviewed the application and consider that a contribution of £5,000 is requested towards mitigating the additional trips created by the development by improving TfL's 10 Healthy Street indicators.
- 10.79 In summary, officers are satisfied that the proposed heads of terms within the legal agreement would provide sufficient mitigation against any potential car parking pressure generated by the proposal. This conclusion is supported by Highways Officers and would ensure compliance with the objectives of Policy DM16.

(ii) Cycle Parking

- 10.80 Local Plan Policy DM16 sets the minimum requirements for cycle parking for new developments at one cycle-storage space for a one-bedroom dwellings and two cycle-spaces for dwellings of two-bedrooms or above. Accordingly, the proposal would be required to provide a minimum of 8 cycle spaces for future residents.
- 10.81 The proposal would be provided with private rear gardens, these garden areas can be used to store bikes and as such no additional provisions are required.

(iii) Proposed Highways Works

- 10.82 A Section 278 Agreement and a highways condition survey has been requested by Highways as a way of addressing highways issues that are raised by this development. These measures would be secured through the S106 legal agreement.
- 10.83 An Outline Construction Logistics plan was submitted and reviewed by Council's Highways Team, they were satisfied with the information contained within the outline CLP however requested a detailed Construction Logistics Plan and Construction Method Statement for consideration and approval prior to commencement of any site preparation. This will need to ensure that any disruption will be kept to a minimum within the area. As such on balance it is considered that the proposal satisfies the requirements of Policy DM16 and CS7 and is therefore acceptable.

J Refuse and Recycling

- 10.84 Local Plan Policy DM32 states that in managing the impact of new developments on neighbouring amenity, new developments should ensure the provision of facilities for the storage, collection and disposal of refuse. Waltham Forest Waste and Recycling Guidance (2019) sets the minimum requirements for external waste storage for new developments with communal facilities as set below:
- Studio/ one bedroom: 100 litres for refuse and 100 litres for recycling per property of this type within the development (i.e. 200 litres total);
 - Two or more bedrooms: 120 litres for refuse and 120 litres for recycling per property of this type within the development (i.e. 240 litres total).
- 10.85 A communal bin store is provided to the front of the site and each dwelling would be provided with 3X240 L wheel Bins and a food caddy. As such the space is within 10m of the refuse truck parked on Wolsey Avenue and is within an accessible location for future residents. The proposal complies with local plan Policies CS6, CS13 and CS15 of the adopted Waltham Forest Local Plan – Core Strategy (2012) and Policy DM23, DM24 and DM32 of the adopted Waltham Forest Local Plan – Development Management Policies (2013).
- 10.86 In light of this, it is considered that the proposed scheme, subject to pre-commencement conditions relating to refuse storage design and waste

management strategy would not comply with Policy CS13 and DM32 of the Local Plan and therefore is recommended for refusal on this basis.

K Environment and Sustainable Design

10.87 The following issues are considered in relation to the principle of the development:

i. Contaminated Land & Basement Impact Assessment

10.88 Policy DM24 applies to when a proposal is being considered on development sites which are potentially contaminated, the Council will need to be satisfied that the development can safely be constructed and used.

10.89 The proposed development includes the demolition of the existing single storey garage structures and a residential site redevelopment. The application is accompanied by the following technical documents:

10.90 The proposed development includes the demolition of the existing building, the construction of basement, ground floor and first floor. The application is accompanied by the following technical documents:

- Preliminary Contamination Risk Assessment (November 2020)

10.91 The above information has been reviewed by the councils Contaminated Land Officer. The Risk Assessment has recommended a ground investigation and officers have concluded that this will need to be carried out. In addition to this, officers have also required that an Intrusive pre-demolition and refurbishment asbestos survey in accordance with HSG264 must also be carried out supported by a mitigation scheme to control risks to future occupiers.

10.92 Conditions relating to land contamination have been suggested by officers.

10.93 In light of this, the proposed scheme, subject to the recommended conditions, would comply with Policy CS4, DM10, DM11 and DM32 of the Local Plan.

ii. Air Quality

10.94 Policy DM24 (Environmental Protection) together with CS13 (Promoting Health and Wellbeing) state that new developments should neither contribute to, nor suffer from unacceptable levels of air pollution, measured having regard to DEFRA's Local Air Management Technical Guidance and London Council's Air Quality and Planning Guidance or successor documents. The application is not considered a major application and therefore did not require an air quality assessment to be submitted.

iii. Surface Water and Flooding

10.95 All new schemes need to be designed to ensure redevelopment will be safe without increasing flood risk and designed to sufficiently manage water run-off as directed by Local Plan Policies CS4 and DM34 and London Plan Policies 5.12 and 5.13.

- 10.96 No design details relating to surface water and flooding has been submitted at this stage. These matters can be resolved via a planning condition relating to on-site water management, and a condition for a detailed drainage design for the development will need to be submitted to comply with requirements of the London Plan and the GLA Supplementary Planning Guidance “Sustainable Design & Construction”.
- 10.97 Subject to the requirements of the condition, the proposal would be acceptable in accordance with Policy DM34 of the Waltham Forest Development Management Policies 2013 (DMP). In light of this and subject to relevant pre-commencement conditions the proposal would be acceptable in accordance with Policy DM34 of the Waltham Forest Development Management Policies 2013 (DMP).

iv. Water Efficiency

- 10.98 Local Plan policy DM34 states that developments should implement water efficiency measures to achieve usage of less than or equal to 105 litres per person per day for residential use. The Council’s Sustainability team reviewed the application and made the following recommendations:
- The proposal is acceptable subject to water efficiency calculations demonstrating that 105 litres per person per day target would be achieved.
- 10.99 Considering all the points above, the proposal would achieve a high level of water efficiency in line with The London Plan and Local Plan policies DM7, DM10, DM11, DM34 and DM35.

v. Energy Efficiency

- 10.100 The London Plan sets out a CO2 reduction target of 40% against Building Regulations 2010 and 35% against Building Regulations 2013. The Waltham Forest Local Plan DM10 requires developers to submit a self-assessment including calculation of the energy demand and carbon dioxide emissions for both regulated and unregulated energy separately at each stage of the energy hierarchy. This requirement applies to all developments over a threshold of one residential unit and 100 sq.m and would be applicable to this application.
- 10.101 A condition requiring the submission of a water efficiency statement and reduction in dependency of fossil fuels while reducing CO2 emissions is proposed as per the recommendation.
- 10.102 In light of this, the proposed scheme would comply with Policy CS4, DM10, DM11 and DM32 of the Local Plan.

L Fire Safety

- 10.103 London Plan policy D12 requires all developments to achieve the highest standards of Fire Safety. The furthest most dwelling within the development site is within 45m of the highway and this would be the maximum recommended distance for a fire appliance to be able to reach a property from the street. The Manual for streets document outlines that minimum road/access

withds for a fire appliance must measure at least 3.1m wide. In this instance, the access gates exceed 4m in width and this is considered acceptable for such appliances to reverse onto the site. Therefore the proposed development would due to its position relative to the public highway appear to raise no concerns with regards to emergency access. It would nonetheless have to meet Building Regulations with respect to fire safety. The proposal is considered acceptable with respect to Policy D12.

M Planning obligations

10.103 Section 106 (s106) 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 of 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.

10.104 In terms of the s106 Agreement, the required Heads of Terms, having regard to planning policy, the Waltham Forest Supplementary Planning Document “Obligations” (2017) for this development relate to:

- Highways: Car free development – Residents will not be eligible for a parking permit for any surrounding CPZ.
- Highways: S278 agreement for Highways Works.
- Highways: Conditions Survey

10.105 The details of these requirements are set out in the recommendation section of this report, paragraph 13.1.

11 CONCLUSION

11.1 The provision for residential development within the Borough is encouraged by the Council’s Local Plan policies, national guidance in the NPPF and regional policies of the London Plan. The scheme would provide an appropriate residential environment, for its future occupiers and would be considered appropriate with regards to neighbouring amenity. The proposed scheme provides four much needed small to medium sized family housing to contribute to the boroughs housing stock. Considering the nature and character of the surrounding area, it is concluded that a residential use is acceptable in principle.

11.2 The loss of existing domestic car parking/garage use is considered appropriate in this location and circumstance is supported, with a mixed use residential led scheme and proposed housing mix, is policy compliant.

11.3 The proposed development has regard to the scale and massing, structure and form of development in the area, and would be appropriate in its context given the residential nature of the locality. The design of the buildings would be contemporary and innovative and the

proposed materiality results in a modern interpretation of what is found within the immediate locale.

- 11.4 The proposal would comply with all the internal and external space standards.
- 11.5 The proposed would have an acceptable impact on neighbouring amenity in terms of daylight/sunlight/outlook and privacy. The site does not have amenity value and subject to a comprehensive soft landscaping plan and planting details it would improve biodiversity in the area.
- 11.6 The proposed development would have an acceptable impact on highway safety and safe and secure cycle parking and bin storage provision would be secured via planning conditions.
- 11.7 Subject to appropriate conditions the development would incorporate the highest environmental standards and would be sustainable, in that it would deliver acceptable energy reduction measures, water efficiency, drainage system, meet and exceed the required carbon dioxide reduction targets and be required to comply with the required land contamination standards.
- 11.8 The conditions set out in the S106 Heads of Terms agreed 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.
- 11.9 All material considerations have been taken into account and the proposal has been considered acceptable. Officers are satisfied that the responses to the consultation have been addressed and that the development would not unduly affect neighbouring residential amenity. Taking into account the consistency of the scheme with the Local Plan and considering all material planning considerations, the proposal is considered acceptable.

12 ADDITIONAL CONSIDERATIONS

Public Sector Equality Duty

- 12.1 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.
 - D. The protected characteristics are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation.
- 12.2 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.
- 12.3 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

- 12.4 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.
- 12.5 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 approve 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.

13.RECOMMENDATION

- 13.1 The Planning Committee is requested to grant planning permission subject to conditions and completion of the Section 106 Agreement with the terms in Table 6 below:

CATEGORY	TERMS
Highways	Car free development – Residents will not be eligible for a parking permit for any surrounding CPZ.

Highways -s278 enabling works	- Condition Survey - Renewal of the existing crossover
LBWF Fees	Payment of the Council's legal fees for the preparation and completion of the Legal Agreement

- 12.6 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 s106 Agreement and to agree any minor amendments to the conditions or the s106 Agreement on the terms set out above.
- 12.7 In the event that the S106 agreement is not completed within 12 weeks following committee, the Assistant Director of Development Management and Building Control is hereby authorised to refuse the application, if appropriate.

Conditions and Reasons:

1. The development hereby permitted shall begin not later than the expiration of three years from the date of this permission.

Reason: to comply with the provisions of section 91(1) (a) of The Town and Country Planning Act 1990 (as amended).

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

Drawing Numbers:

201 Rev 3, 200 Rev 4, 1001 Rev B, 310 Rev 1, 499 Rev 1, 300 Rev 1, 500 Rev 1, 502 Rev 1, 501 Rev 1, 503 Rev 1, 202 Rev 1, 113 Rev 1, 115 Rev 1, 114 Rev 1, 110 Rev 1, 321 Rev 1, 322 Rev 1, 320 Rev 1, 100 Rev 1, 111 Rev 1, 112 Rev 1 and 01 Rev 1

Supporting Documents:

- Capital Transport Planning – Outline Construction Logistics Plan December 2020
- Peacock and Smith Planning Statement. December 2020
- Metashape Architects Design and Access Statement. December 2020
- Paddock GEO Engineering Preliminary Contamination Risk Assessment. November 2020
- Environmental Economics Daylight and Sunlight Report December 2020

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

3. Any first floor windows flank windows shall be fitted with obscured glazed screens and retained as such for the lifetime of the development.

Reason: To prevent overlooking and loss of privacy in the interests of the amenities of the adjoining property, in accordance with Policy CS15 of the adopted Waltham Forest Local Plan – Core Strategy (2012) and Policy DM32 of the adopted Waltham Forest Local Plan – Development Management Policies (2013).

4. The private and communal amenity spaces shall be laid out and implemented in accordance with the approved plans and shall not be used for any other purpose.

Reason: To protect the amenities of adjoining occupiers and the surrounding area in order to comply with Policy 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).

5. Prior to the commencement of the development, excluding site investigation and clearance works, demolition and construction to slab level, details indicating the positions, design, materials and type of boundary treatment and other means of enclosure to be erected shall be submitted to and approved in writing by the Local Planning Authority. The boundary treatments shall be completed in accordance with the approved details prior to occupation of any of the units hereby permitted and thereafter permanently retained.

Reason: To ensure a satisfactory appearance in accordance with Policy CS15 of the Waltham Forest Local Plan Core Strategy (2012).

6. Prior to the commencement of development, excluding site clearance and investigation works, demolition and construction to slab level, a scheme of hard and soft landscaping to be provided on site shall be submitted to and approved in writing by the Local Planning Authority. Soft landscape works shall include: planting plans, and schedules of plants, noting species, plant sizes and proposed numbers/densities within a planting schedule, also the method of planting including soil composition, tying and staking, a maintenance care regime including mulching and watering. The development shall be implemented in accordance with the approved details and retained as such for the lifetime of the development.

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).

7. All planting, seeding or turfing comprised in the approved details of landscaping shall be carried out not later than the first planting and seeding seasons prior to the first occupation of any of the residential units, or the completion of the development, whichever is the sooner. Any new trees or shrubs which, within a period of 5 years from the completion of the development, die, are removed, or become seriously damaged or diseased, shall be replaced in the next planting season, with others of a similar size and species, unless the Local Planning Authority agrees any variation in writing.

Reason: To ensure a satisfactory appearance and in the interest of local amenity and biodiversity in accordance with Policy CS15 of the Waltham Forest Local Plan Core Strategy (2012), and Policies DM23, DM32, DM35 of the Waltham Forest Local Plan Development Management Policies (2013).

8. 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).

9. Prior to the commencement of the development, excluding site investigation and clearance works, demolition and groundworks to slab level, a lighting scheme shall be submitted to and approved in writing by the Local Planning Authority, which shall incorporate measures to ensure that light from the luminaires would not exceed 10 EV(lux) when measured at any residential or light sensitive window overlooking the development, all luminaries shall be oriented and designed in such a way to minimise light spillage beyond the site boundary and prevent glare to the windows of residential or light sensitive properties identified. The lighting scheme shall be implemented in accordance with the agreed details and thereafter maintained as such for the lifetime of the development.

Reason: To protect the amenities of adjoining 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)

10. The cycle and refuse/recycling arrangements shall be constructed in accordance with Plan number 200 Rev 4 unless otherwise agreed in writing by the Local Planning Authority and shall thereafter be retained as such for the lifetime of the development

Reason: To safeguard and enhance the visual amenities of the locality, in accordance with Policy CS15 of the adopted Waltham Forest Local Plan – Core Strategy (2012) and Policy DM29 of the adopted Waltham Forest Local Plan – Development Management Policies (2013).

11. Prior to the commencement of the development, a detailed Construction Logistics Plan shall be submitted to and approved by the local planning authority. The logistics plan shall include details of site access, journey planning, access routes (taking into consideration existing road layout), hours of delivery, temporary traffic arrangements or restrictions, site operation times, loading and unloading locations, material storage and a swept path analysis to show the haulage vehicles accessing and egressing. All works shall be carried out in accordance with the approved details throughout all demolition and construction works. This must be submitted using the TfL template and guidance found here: www.constructionlogistics.org.uk.

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).

12. Prior to the commencement of development on site, notwithstanding site investigation work, clearance and demolition, a SUDS (Sustainable Urban Drainage System) to deal with all surface water drainage from the site, including details of proposed rainwater harvesting systems, green roofs and proposed soakaway designs together with infiltration test results and recommended soakage rates, that aims to achieve a greenfield run-off rate, shall be submitted to and approved 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 adopted Waltham Forest Local Plan - Core Strategy (2012) and Policy DM34 of the adopted Waltham Forest Local Plan – Development Management Policies (2013).

13. 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).

14. Prior to commencement of the development hereby permitted, 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 and this must be adhered to during the demolition and construction period. In preparing the AQMDP the applicant should follow 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.

Reason: To manage and mitigate the impact of the development on the air quality and dust emissions in the area and protect the amenities of the nearby residents to avoid irreversible and unacceptable damage to the environment to comply with London Plan policies 5.3 and 7.14, and the London Plan SPGs for Sustainable Design and Construction and Control of Dust and Emissions during Construction and Demolition and 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).

15. Prior to commencement of the development hereby permitted, a Demolition and Construction Method Statement must be submitted to, and approved in writing by, the local planning authority. The approved Statement shall be adhered to throughout the demolition and construction period. The Statement shall provide for the:

- parking of vehicles of site operatives and visitors
- loading and unloading of plant and materials
- storage of plant and materials used in constructing the development
- erection and maintenance of security hoarding including decorative displays and facilities for public viewing, where appropriate
- wheel washing facilities
- measures to control emissions, dust and dirt during construction
- recycling/disposing of waste resulting from demolition and construction works

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).

16. 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 London Plan policy 7.14 and the Mayor's SPG: The Control

17. 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 for the lifetime of the development.

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) Policy DM10 of the Waltham Forest Local Plan Development Management Policies (2013).

18. Prior to the commencement of development on site (excluding site investigation and demolition and site clearance works, 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, as such for the lifetime of the development.

Reason: To ensure high standards of sustainable design and construction in new development.

19. The houses hereby approved 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: In the interest of accessibility in accordance with Policy DM30 of the Waltham Forest Local Plan Development Management Policies (2013).

20. 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.

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 adopted Waltham Forest Local Plan - Core Strategy (2012) and Policy DM34 of the adopted Waltham Forest Local Plan – Development Management Policies (2013).

21. Prior to occupation, details of access arrangements from Wolsey Avenue and access gates must be submitted to the Local Planning Authority to ensure that the site (frontage area) cannot be used for parking and shall only provide access for emergency vehicles or service vehicles required for maintenance purposes. The agreed details shall be implemented and retained thereafter for the lifetime of the development.

Reason: To ensure that access is only given to emergency services and servicing vehicles in accordance with local plan policies DM14, DM15 and DM16 of the adopted Waltham Forest Local Plan – Development Management Policies (2013).

22. Prior to occupation, the development shall achieve a Certificate of Compliance to the relevant Secure by Design Guide(s) or alternatively achieve Crime Prevention Standards submitted to and approved in

writing by the Local Planning Authority in conjunction 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: To ensure safety and security of the site users, in accordance with Policies CS15 and CS16 of the adopted Waltham Forest Local Plan – Core Strategy (2012) and Policies DM29 and DM33 of the adopted Waltham Forest Local Plan – Development Management Policies (2013).

Informative:

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 and the decision was delivered in a timely manner.
2. A legal agreement has been entered into with the London Borough of Waltham Forest in conjunction with this grant of planning permission to ensure that the development is acceptable.
3. You are advised that the s278 highway works forming a part of the agreed s106 obligations agreement will require further consideration and discussions with the Local Highway Authority.
4. The application subject to both the Mayoral Community Infrastructure Levy (CIL) and Waltham Forest Council CIL.
5. No demolition or development shall commence until all necessary pre-commencement 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.
6. For information on the NRMM Low Emission Zone requirements and to register NRMM, please visit "<http://nrmm.london/>".
7. The submitted Construction and Demolition Method Statement 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; and
 - Copy of an Asbestos Survey.
8. Construction activities must not affect traffic flows on the highway. No materials can be stored on the highway and no construction related activities can take place on the highway. It is an offence to place scaffolding, skip or hoarding on the highway without permission. Early contact with the Council's Network Operations is advisable, as it may affect the construction programme.
9. It is an offence to place scaffolding, skip or hoarding on the highway without permission. Early contact with the Council's Network Operations is advisable, as it may affect the construction programme.
10. It is expected that works of demolition or construction shall be carried out during normal working hours, i.e. 0800 to 1800 hours Monday to Friday, and 0800 to 1300 hours on Saturdays, with no noisy working audible at the site boundary being permitted on Sundays or Bank Holidays. In addition, the applicant must ensure that adequate measures are in place to control dust and noise on site during the construction work.
11. It is 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.
12. This determination does not constitute permission to build under the building regulations 2010. Works should not commence until any appropriate building regulation applications have been submitted and where necessary approved.
13. This notice is without prejudice to your responsibilities under any other legislation.
14. 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.

15. The Applicant is advised, there may be public sewers crossing or close to your development. If you discover a sewer, it's important that you minimise the risk of damage. We'll need to check that your development doesn't limit repair or maintenance activities 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-large-site/Planning-your-development/Working-near-or-diverting-our-pipes>.

Thames Water requests that the Applicant should incorporate within their proposal, protection to the property by installing a positive pumped device (or equivalent reflecting technological advances) to avoid the risk of backflow at a later date, on the assumption that the sewerage network may surcharge to ground level during storm conditions. Fitting only a non-return valve could result in flooding to the property should there be prolonged surcharge in the public sewer. If as part of the basement development there is a proposal to discharge ground water to the public network, this would require a Groundwater Risk Management Permit from Thames Water. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 or by emailing wwriskmanagement@thameswater.co.uk. Application forms should be completed on line via www.thameswater.co.uk/wastewaterquality.

With regard to surface water drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water we would have no objection. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Should you require further information please refer to our website. <https://developers.thameswater.co.uk/Developing-a-large-site/Apply-and-pay-for-services/Wastewater-services>

Thames Water would advise that with regard to waste water network and waste water process infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.

16. The Applicant is advised that, 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.

On the basis of information provided, Thames Water would advise

that with regard to water network and water treatment infrastructure capacity, we would not have any objection to the above planning application. Thames Water recommends the following informative be attached to this planning permission. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx. 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.

17. **IMPORTANT:** Compliance With Planning Conditions Requiring Submission and Approval of Details Before Development Commences

You will be in breach of planning permission if you start development without complying with a condition requiring you to do something before you start. For example, that a scheme or details of the development must first be approved by the Local Planning Authority.

Carrying out works in breach of such a condition will not satisfy the requirement to commence the development within the time permitted.

Beginning development in breach of a planning condition will invalidate your planning permission.

If you require confirmation as to whether the works you have carried out are acceptable, then you should apply to the Local Planning Authority for a Certificate of Lawfulness.

18. The applicant is advised that failure to retain and regularly maintain the sprinkler system is likely to invalidate any house insurance.

13 BACKGROUND DOCUMENTS

- 13.1 None