



458 Forest Road, Walthamstow



Planning Statement



Boyer

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1. Introduction

- 1.1 This Planning Statement is prepared in support of a planning application made by Pocket Living Forest Road Limited (Pocket) for the redevelopment of the land at 458 Forest Road, Walthamstow, E17 4PZ.
- 1.2 The application site (the Site) is located within the heart of Walthamstow, a short walk from Walthamstow Central and Blackhorse Road stations and numerous town centre amenities including Walthamstow High Street and Market. The Site comprises a vacant former care home (C2 use class) which has been unoccupied since June 2018 and which the Council's Adult Social Care Officers have confirmed is no longer fit to provide satisfactory modern standards of care, without significant investment.
- 1.3 The vacant brownfield site is well connected to public transport nodes and as such is suitable for intensification to optimise residential accommodation, as encouraged by national, strategic and local planning policies. The development will provide 90no. 1-bed Pocket homes, 8no. of which will be wheelchair accessible homes. The development provides 100% affordable housing. Private and communal amenity spaces, secure cycle and refuse storage facilities, hard and soft landscaping and two wheelchair accessible car parking spaces are also proposed on-site.
- 1.4 100% affordable housing can be provided by virtue of the Pocket Living model, which provides consistent sized homes with generous shared amenity space. Pocket homes provide intermediate affordable housing for local people, and is affordable housing that has the full support of the Mayor of London in the form of a loan to assist in funding Pocket homes.
- 1.5 In order to qualify for a Pocket home, buyers have to satisfy three essential criteria:
 1. Live or work in the Borough
 2. Be first time buyers
 3. Earn below the Mayor's income threshold.
- 1.6 The one-bedroom homes are aimed at buyers whose needs are not met by the social or private housing markets. In order to respond to the great local need for affordable housing, the proposal maximises the affordable housing quantum whilst offering a high quality and highly sustainable development. There is significant evidence that there is local demand within the London Borough of Waltham Forest (LBWF) for this type of affordable housing.
- 1.7 LBWF has previously granted permission for a Pocket development at Gainsford Road. This award-winning development provides 45no. 1-bed affordable Pocket homes on Gainsford Road, Walthamstow (LBWF ref: 161661).

The development

- 1.8 The proposed development would demolish the existing building on the Site and take the opportunity to reinstate a historic building line addressing Gaywood, Forest and Hawthorne Roads which was destroyed by Second World War bombing. This will complete the former urban block; an improvement from the existing building which is set back from Forest and Gaywood Roads, breaking the street frontage. The proposed building presents a four-storey front to Forest Road with a set back fifth storey adorned with a gently scalloped parapet. The set back fifth floor massing is consistent with nearby residential buildings to the east of the Site, which also front this main Walthamstow artery.
- 1.9 Where the proposed building meets the neighbouring terraced housing on Gaywood and Hawthorne Roads, its scale reduces to create a comfortable relationship with the domestic buildings. A strip of planting surrounds the building, continuing the grain of front gardens from nearby terraced houses on Gaywood Road and providing defensible space around the development. The building's primary entrance fronts appropriately onto Forest Road whilst the street-facing ground floor windows create a new active frontage.
- 1.10 Overall, the proposal optimises the Site's potential for affordable housing whilst delivering exemplar design. The density and scale of the development would integrate successfully into the evolving fabric of the area, regenerating the redundant Site and making a significant contribution to the delivery of much needed affordable housing in the Borough.
- 1.11 This Planning Statement assesses the proposals against the policies in the Development Plan and other material considerations, which are relevant to the determination of the application. The Statement is structured as follows:
 - Section 2 - provides an explanation of the Pocket model and the Mayor's Housing Covenant;
 - Section 3 - describes the Site and surrounding context;
 - Section 4 - details the proposed development;
 - Section 5 - details the relevant planning history;
 - Section 6 - details the pre-application discussions;
 - Section 7 - provides an overview of the principal national, regional and local planning policy and guidance;
 - Section 8 - provides an assessment of the proposal against the provisions of the Development Plan and other material considerations; and
 - Section 9 - concludes the findings of the assessment of the proposed development.
- 1.12 This Planning Statement should be read in conjunction with the following additional documents, which accompany the application:

- Signed and dated statutory application forms prepared by Boyer;
- Existing and proposed drawings including a Site Location Plan prepared by Gort Scott Architects;
- Design and Access Statement prepared by Gort Scott Architects;
- Transport Assessment prepared by Transport Planning Practice;
- Draft Travel Plan prepared by Transport Planning Practice
- Draft Servicing, Delivery and Waste Management Plan prepared by Transport Planning Practice;
- Statement of Community Involvement prepared by Boyer;
- Draft Construction and Demolition Logistics Plan prepared by Pocket;
- Site Waste Management Plan prepared by Pocket;
- Energy Statement prepared by XCO2;
- Sustainability Statement prepared by XCO2;
- SUDS and Surface Water Drainage Assessment prepared by Whitby Wood;
- Ecology Appraisal prepared by XCO2;
- Arboricultural Report prepared by Treework Environmental Practice;
- Acoustic Assessment prepared by XCO2;
- Air Quality Assessment prepared by XCO2;
- Ground Contamination Report prepared by RSK;
- Detailed Unexploded Ordnance Risk Assessment prepared by 1st Line Defence;
- Landscaping Design Statement (included within Design and Access Statement) prepared by BD Landscaping;
- External Lighting Statement prepared by XCO2;
- Fire Strategy Statement prepared by JGA;
- Daylight and Sunlight Assessment prepared by Point 2 Surveyors;
- Internal Daylight and Sunlight Assessment prepared by Point 2 Surveyors;
- Analysis of Need for Pocket Living's Product in London Borough of Waltham Forest prepared by Cobweb Consulting;
- Affordable Housing Statement prepared by Boyer;

- Health Impact Assessment prepared by Boyer; and
- Financial Viability Assessment prepared by Jones Lang LaSalle (submitted under separate cover).

2. Pocket Living

Pocket Living

- 2.1 Pocket is an innovative small developer established in 2005 to deliver grant-free affordable homes to purchase for those on moderate incomes; essential to London's economy but who cannot afford to buy a market home and earn too much for social housing.
- 2.2 The importance of what Pocket does is recognised in partnerships with the GLA, TfL and Homes England; established to deliver innovative affordable homes for first time buyers. Pocket first received funding from the Mayor in 2013, to deliver intermediate homes for first time buyers. Further loan funding was awarded in 2017 to increase delivery of Pocket's "genuinely affordable homes" to over 1,000 starts by 2021. This loan funding is recycled to support continued delivery and represents less than 2% of the Mayoral housing budget.
- 2.3 Pocket homes are sold at a 20% discount to local prices, as verified by an independent valuer, to eligible purchasers, defined by income and where they live or work. This enables purchasers to buy and stay in their community. Covenants in the lease ensure that the homes remain affordable in perpetuity.
- 2.4 Pocket homes are only sold to first time buyers. Provisions in the lease prevent sub-letting other than in exceptional circumstances of hardship, where permission is required from Pocket. Pocket conduct an 'annual verification process' (AVP) to ensures that the purchaser remains resident.
- 2.5 Pocket specialises in delivering high quality developments on complex brownfield sites; bringing them back in to beneficial use and improving the local streetscape. Pocket takes a design-led approach and has won several awards from RIBA London, the Evening Standard, CABE, The Sunday Times and National Housing Awards.
- 2.6 Pocket is one of the first developers to embrace modular construction; from bathroom and utility pods to full modular construction where site conditions permit; most recently employed at Mapleton Crescent in Wandsworth, Bollo Lane in Ealing and Addiscombe Grove in Croydon.
- 2.7 The homes exceed space standards (national technical standards/London Plan) and have been carefully designed to maximise usable space and provide a light, pleasant and efficient environment. The design is continually evolving to respond to customer feedback and new innovations. The buildings and homes are designed to be energy efficient and minimise maintenance costs for residents. Pocket developments provide ample cycle parking and are car free.
- 2.8 The monthly cost of a Pocket home is less than renting and shared ownership. Unlike shared ownership the purchaser owns 100% of the home. A residents' management

committee controls the service charge, ensuring that it reflects the level of cost and services desired by the residents. Pocket Living is a signatory to the Mayor's (shared ownership) service charge charter and provides the first two years' service charge in conveyancing information to give certainty to purchasers.

- 2.9 Pocket encourages a sense of community amongst its residents, starting with welcome drinks and aided by communal spaces such as courtyards and roof terraces.
- 2.10 The homes accord with the National Planning Framework (NPPF): eligibility is determined with regard to local incomes and house prices and provisions ensure the homes remain at a discount for future eligible households.

Mayor of London's Housing Covenant and Innovation Fund

- 2.11 In September 2012, the GLA published the Mayor's Housing Covenant (homes for working Londoners).
- 2.12 The Mayor acknowledges that for many Londoners on modest incomes, London's current housing market is not working. Hard-working Londoners that occupy key positions in London's social infrastructure are often priced out of the private housing market and overlooked as a priority for scarce affordable rented accommodation. This forces these Londoners to look outside the borough they work in and contribute to, increasing their commuting times and removing them from their local communities.
- 2.13 The premise of the Housing Covenant is that those who work hard for London's economy should benefit from its success. To do this the Mayor recognises that the mid-market offer for these people must be addressed through the provision of more flexible housing products. The alternative is that London risks losing a significant proportion of its skilled workforce, to the detriment of London's economy and social fabric.
- 2.14 The Mayor's Housing Covenant made available up to £100 million to stimulate the supply of intermediate housing. This helped an initial 10,000 Londoners and established a ten-year revolving fund so that this investment can continue to help future generations onto the housing ladder.
- 2.15 The Mayor of London has put Pocket at the forefront of delivering the housing he seeks through his Housing Covenant, awarding Pocket a £21.7 million loan in 2013. In 2017 he invested a further £25m in Pocket from the Mayor's Innovation Fund to boost new factory-built affordable homes for first-time buyers in the capital. This will see Pocket start on 1,059 new homes by March 2021, with a third expected to be built using modern methods of construction. The Mayor's funding will help finance site purchases and will be paid back in full by the end of the next decade. The Mayor is supporting innovative development like this as he believes off-site construction is a key tool to tackle London's housing crisis and getting homes built more quickly.
- 2.16 Pocket has achieved planning permission previously in the Borough for a development containing 45 one bed affordable homes and shared communal spaces on Gainsford

Road. Pocket has also gained permission in other boroughs such as Barking, Camden, Hackney, Haringey, Lewisham, Westminster, Hammersmith and Fulham, Hounslow, Lambeth, Ealing, Southwark, Wandsworth and Kingston and Croydon.

3. The Site & Surrounding Context

- 3.1 The Site is located on the south side of Forest Road and bounded by Hawthorne Road and Gaywood Road on its eastern and western boundaries. It is currently occupied by the vacant former Ross Wyld Care Home. The main access is located on Hawthorne Road which leads to an area of hardstanding comprising 12 car parking spaces. To the south are residential terraces.
- 3.2 Forest Road (A503) is a London Arterial Road that links Tottenham to the west to the North Circular Road (A4016) to the east, via the lower Lea Valley. Hawthorne and Gaywood Roads are local access roads.
- 3.3 The Site is a short walk from Walthamstow Central and Blackhorse Road stations and numerous town centre amenities including Walthamstow High Street and Market. A manual assessment of the Site concludes that it has a Public Transport Accessibility Level of 4 (Good).
- 3.4 A segregated cycle lane passes the front of the Site. Forest Road itself has benefited from significant enhancement of its cycle infrastructure as part of the Borough's Mini-Holland cycle status. The roads surrounding the Site are part of two Controlled Parking Zones (CPZ).
- 3.5 The Site is currently occupied by a three-storey vacant care home (Class C2) which closed in June 2018.
- 3.6 The existing building is a post-war infill, set back from the street frontages, which does not integrate successfully with the pattern of terraced buildings that characterise the area south of Forest Road. Consequently, whilst the Site occupies a prominent position on Forest Road, it currently presents an inactive frontage to the street and is disengaged from the pavement line.
- 3.7 The surrounding area to the south is largely residential in nature comprising two storey terraced housing or three storey blocks of flats. However, many of the buildings fronting Forest Road have commercial uses at ground floor, reflective of its commercial characteristics as a key artery through Walthamstow.
- 3.8 The upper floors of properties on Forest Road are generally residential. There are a number of examples of larger scale buildings fronting Forest Road, including several examples of five storey buildings, such as 1 Hoe Street and the Howard Mansions (516-538 Forest Road).
- 3.9 The William Morris Gallery (Grade II* Listed) is located to the north of the site across Forest Road. However the distance between the Site and the William Morris Gallery is such that the Site is not within the listed building's context and development will not have an impact on its setting. As the site is not located within the Gallery's setting, it is

considered inconsequential to the proposals, and a Heritage Statement is not required. The Site is not located within a conservation area.

- 3.10 Lloyd Park, which provides a range of facilities, is located opposite the Site. The park provides a café, play area with equipment for all ages, natural play area, outdoor gym, tennis courts, basketball courts, outdoor table tennis, petanque court, skate park, bowling green, formal gardens, moat and island, nature area, community room, Winns Gallery, Lloyd Park studios and the William Morris Gallery.
- 3.11 There are a number of existing trees on the Site and on surrounding footways. An Arboricultural Assessment has determined that none of the trees are of high quality or value.
- 3.12 There is an existing UK Power Networks (UKPN) substation on the north-eastern corner of the existing building. The Design Team has engaged with UK Power Networks on its replacement and it is incorporated into the proposals.

4. The Proposed Development

4.1 Planning permission is sought for:

“Demolition of existing building and construction of a building accommodating Pocket homes (100% affordable), together with associated private and communal amenity space, waste and cycle storage and 2 off-street accessible car parking spaces.”

4.2 The proposals comprise a ‘C-shaped’ perimeter building varying between three and five storeys in height, with a generous residents’ courtyard provided on the southern side of the Site. The building positively addresses Forest, Gaywood and Hawthorne Roads, reintroducing a previously lost building line to activate the streets.

4.3 The building’s principal volume fronts Forest Road, which is a primary artery through Walthamstow. The elevation is articulated in a manner that effectively breaks the length of the elevation. A five-storey element is positioned within the central part of the Forest Road elevation, whilst the corner elements fronting the more subsidiary local streets of Hawthorne and Gaywood Roads reduce to four storeys in height. A combination of brick with sculpted lintel details have been chosen as the most sympathetic material selection for the Site.

4.4 The height of the building mediates to the domestic scale buildings to the south of the Site. On Gaywood Road the building is reduced to three storeys in height with a significantly set back fourth floor, creating a comfortable relationship with the adjoining properties. A series of front gardens onto Gaywood Road integrate the proposal with the existing street character and grain.

4.5 On Hawthorne Road, the proposed building provides a four-storey end to the street on the Forest Road corner, mirroring the relationship of the Aladura International Church to adjacent terraced houses to the south and creating a bookend with the existing terraced housing. A generous opening is retained to the nearest neighbouring property on Hawthorne Road, which allows space for 2no. accessible car parking spaces, and a secondary access to the Site via a secure gate which opens into the shared rear amenity area and secure cycle storage.

4.6 Whilst not located within the context of the William Morris Gallery, the proposed building has nonetheless been designed with it in mind. Where the building is closest to the Gallery, the elevation treatment has been developed so that it addresses the Gallery, and establishes a visual relationship with it. The angled elevation facing the Gallery forms a principal face of the building with a set of equally-spaced windows running up all floors to a decorative parapet, thereby forming a careful composition facing Forest Road.

4.7 The building’s principal entrance is from Forest Road, and will help to activate this part of the road. The proposals focus on providing a single, high quality core which is generously spaced and naturally lit to create a welcoming environment which will encourage residents

to dwell. The intention is that the shared core helps develop the community feeling within the development, which is a key principle of Pocket developments.

- 4.8 An enhanced garden space is proposed to occupy the entire corner frontage to Gaywood Road, thus providing privacy for ground floor homes on this elevation and creating an opportunity for new landscaping. A replacement semi-mature Tulip tree is proposed within this corner of the Site.
- 4.9 A generous communal amenity area is proposed to the rear of the building. The amenity area provides communal seating, raised planters with seating, and a communal allotment-style growing space for residents. Additional roof terrace amenity areas with planters and seating are provided at third and fourth floor levels.
- 4.10 The 90no. new homes will be 100% affordable. The development provides 8no. M4 (3) adaptable dwellings designed to be easily adaptable for occupiers who are wheelchair users.
- 4.11 Aside from the 2no. accessible parking spaces, the development will be car-free and residents will be restricted from obtaining car parking permits in existing or future CPZ's.
- 4.12 The proposals will provide 90no. residents' cycle spaces within a secure, covered cycle store located within the communal amenity area. 86no. of these spaces will be within two-tier cycle racks, and 6no. will be Sheffield cycle stands sufficiently spaced for non-standard bicycles. Visitor cycle spaces will be provided within the building's entrance lobby.
- 4.13 A refuse and recycling store is located at ground floor level, accessed from Forest Road. An existing UKPN substation on the north-eastern corner is to be replaced and incorporated into the proposals, also accessed from Forest Road.

5. Planning History

- 5.1 There is limited planning history related to the Site. Historical planning applications relate to alterations associated with the Site's former use as a care home and are of limited relevance to the redevelopment proposals.

6. Pre-application Consultation

Pre-application discussions

- 6.1 Detailed pre-application discussions have been held with Planning, Design, Housing and Transport Officers from LBWF, including two meetings held in May and November 2019. The proposals have also been presented to the Council's Design Review Panel in June 2019.
- 6.2 The extensive pre-application consultation has informed the proposals for which planning permission is now sought. Design changes have been introduced to address comments raised throughout the pre-application consultation process.
- 6.3 In summary, the Pocket (the Applicant) has engaged in detailed pre-application discussions with LBWF, meeting to discuss several revisions of the proposed development. LBWF Planning and Design Officers have been supportive of the proposed affordable housing provision. Officers offered advice and design guidance to assist in bringing forward a high quality development.

Design Review Panel

- 6.4 On 20th June 2019 the proposals were presented to the Council's Design Review Panel at Waltham Forest Town Hall. Formal written feedback was received on 1st July 2019 with a summary of the Panel's comments. The response to these comments from the architects, Gort Scott, is included within the Design and Access Statement submitted with this planning application.

Community Engagement

- 6.5 The accompanying Statement of Community Involvement prepared by Boyer details the Applicant's consultations with the local community, including local people, local amenity groups, businesses and local ward Councillors.
- 6.6 The consultation programme sought to engage with the local community to ensure that as many people as possible had the opportunity to take part in the process. This responds to LBWF's published guidance.
- 6.7 In order to ensure the consultation programme met the guidance, the Applicant also consulted the following stakeholders:
 - The Waltham Forest Civic Society
 - Waltham Forest Cycling Campaign
 - Friends of Lloyd Park
 - William Morris Gallery

- Architects E17
 - Meeting with Cllr Lacey-Holland (William Morris ward) on 5th December 2019.
- 6.8 A public exhibition took place in the One Hoe Street Community Space in June 2019. Information boards for the proposals were available for interested members of the public to view. Consultation feedback forms were completed by 31 attendees, and a review of the comments is provided within the Statement of Community Involvement submitted with this application.
- 6.9 Questions were raised relating to a number of issues including the impact of construction works on local residents, transport impact, the provision of affordable housing and the design of the proposals. Details relating to these queries are covered within the Construction Logistics Plan, Transport Assessment and the Design and Access Statement, as well as this Planning Statement, all of which are submitted with the planning application.

7. The Development Plan

- 7.1 Section 38(6) of the Planning & Compulsory Purchase Act (2004), states that the determination of a planning application must be made in accordance with the Development Plan, unless material considerations indicate otherwise.
- 7.2 The Development Plan comprises the London Plan (as amended 2016), the Council's adopted Core Strategy (2012) and the Development Management Policies document (2013).
- 7.3 The Council have also adopted supplementary planning documents which are relevant to the proposals such as the Urban Design SPD and the Inclusive Design SPD.
- 7.4 The planning policy relevant to the consideration of the application therefore comprises three levels of policy – national, regional, and local.

National Planning Policy Framework (2019)

- 7.5 The National Planning Policy Framework (2019) (NPPF) contains national planning policy and sets out the Government's intentions for the planning system and how these are expected to be applied. The Government's National Planning Practice Guidance is also relevant to the determination of the application.
- 7.6 The NPPF was updated in February 2019 by the Ministry of Housing, Communities and Local Government. The document sets out the government's economic, environmental and social planning policies for England.
- 7.7 The overarching national planning policy theme evident from the NPPF is a presumption in favour of sustainable development, which the Government has advised should be at the heart of the planning system. In terms of development management, it advises that the primary objective is to foster the delivery of sustainable development and should not hinder or prevent future development.
- 7.8 The NPPF has not changed the statutory status of the Development Plan as the starting point for decision-making; however, it constitutes guidance for local planning authorities and decision-making both in drawing up plans and as a material consideration in determining applications
- 7.9 Paragraph 59 states that, to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed. Section 5 of the document sets the objective of boosting housing supply significantly.
- 7.10 Paragraph 118 part (c) requires that substantial weight should be given to the value of using suitable brownfield land within settlements for homes and other identified needs, and opportunities should be taken to remediate degraded and derelict land. Part (d) seeks

to promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively.

- 7.11 The NPPF's Glossary at Annex 2 confirms that discounted market sales housing, sold at a discount of at least 20% below local market value is affordable housing.

The London Plan (as amended 2016)

- 7.12 The London Plan is the overall strategic plan for London, setting out an integrated economic, environmental, transport and social framework for the development of London over the next 20–25 years.
- 7.13 The London Plan sets out policies to ensure there is an adequate supply of housing for the city's projected population growth. According to the Plan (Table 1.1), the population of LBWF is forecast to increase by 17.3% from 2011 to 2036.
- 7.14 The Mayor's stated Strategic Policies aim to ensure that "*London is a city that meets the challenges of economic and population growth in ways that ensure a sustainable, good and improving quality of life and sufficient high quality homes and neighbourhoods for all Londoners and help tackle the huge issue of deprivation and inequality among Londoners, including inequality in health outcomes.*"
- 7.15 The London Plan's policy objectives state that the most efficient use of land should be achieved. At paragraph 1.48, it is stated that London must plan for a growing population in a way that does not worsen quality of life for London as a whole, which means that "*we will have to ensure we make the best use of land that is currently vacant or under-used, particularly in east London where the greatest potential exists.*"
- 7.16 Policies within the London Plan are consistent with the thrust of the policies contained within the NPPF as they recognise the need to encourage the effective use of land by reusing land that has been previously developed (brownfield land).
- 7.17 Policy 3.1 sets out that the Mayor is committed to ensuring equal life chances for all Londoners. Meeting the needs and expanding opportunities for all Londoners – and where appropriate, addressing the barriers to meeting the needs of particular groups and communities – is key to tackling the huge issue of inequality across London.
- 7.18 Policy 3.3 states that the Mayor aims to ensure that housing need is met, particularly through the provision of, at least, an annual average of 42,000 net additional homes across London. Table 3.1 sets out the Borough housing targets and Boroughs should seek to exceed their relevant minimum annual average housing targets. The minimum target for LBWF is 8,620 new homes over a 10-year period until 2025, which equates to 862 new homes annually.
- 7.19 Policy 3.4 seeks to ensure that the development potential of sites is maximised in order that housing potential is optimised. Table 3.2 provides guidance on the range of housing densities with regard to location and is a tool for increasing housing density.

- 7.20 Policy 3.5 concerns the quality and design of housing developments and states that these should be of the highest quality internally, externally and in relation to their context and to the wider environment, taking account of strategic policies in the Plan to protect and enhance London's residential environment and attractiveness as a place to live. Policy 3.5 refers to the minimum space standards within Table 3.3 but states: "*Development proposals which compromise the delivery of elements of this policy may be permitted if they are demonstrably of exemplary design and contribute to achievement of other objectives of this Plan*".
- 7.21 Policy 3.8 concerns housing choice and provides that Londoners should have a genuine choice of homes that they can afford and which meet their requirements for different sizes and types of dwellings in the highest quality environments. It seeks to ensure that new developments offer a range of housing choices, in terms of the mix of housing sizes and types, taking account of the housing requirements of different groups, and that 10% of new housing is designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users.
- 7.22 Policy 3.9 concerns mixed and balanced communities. It states that communities mixed and balanced by tenure and household income should be promoted across London through incremental small scale as well as larger scale developments which foster social diversity, redress social exclusion and strengthen communities' sense of responsibility for, and identity with, their neighbourhoods. They must be supported by effective and attractive design, adequate infrastructure and an enhanced environment.
- 7.23 Policy 3.10 defines affordable housing. Intermediate affordable housing is defined as "*homes available for sale or rent at a cost above social rent, but below market levels. These can include shared equity (shared ownership and equity loans), other low cost homes for sale and intermediate rent, but not affordable rent.*"
- 7.24 In the 2016 Mayor's Annual Monitoring Report, to reflect Government's approach to shared ownership, a single £90,000 household income was introduced for intermediate housing; in effect removing the previous higher income cap for families in larger homes. However, recognising the different role that intermediate rented products play in meeting affordable housing need compared to shared ownership products and to ensure those rented products are genuinely affordable in line with the Mayor's London Living Rent product the cap for intermediate rented products will be reduced to a household income of £60,000 per annum. These thresholds remain unchanged.
- 7.25 Therefore, the costs including service charges of intermediate ownership products such as London Shared Ownership and Discounted Market Sale (where they meet the NPPF and London Plan definition of affordable housing), should be affordable to households on incomes of £90,000 or less.
- 7.26 Policy 3.11 sets affordable housing targets. It states that provision of affordable housing provision should be maximised so that an average of at least 17,000 affordable homes are provided each year over the term of the Plan. In order to give impetus to a strong and

diverse intermediate housing sector 40% of the affordable housing provision should be for intermediate rent or sale. Paragraph 3.62 of the Plan states that *“increased provision of intermediate housing is one of the ways in which the supply of affordable housing can be expanded”*.

- 7.27 At Paragraph 3.65 it is stated that this 40% target has been informed by the role that intermediate housing can play in helping Londoners get a first step on the housing ladder, reducing the call on social/affordable rented housing, freeing up social/affordable rented homes, providing wider housing choices and securing a more balanced social mix on mono-tenure estates. Account has also been taken of the way intermediate housing development can extend the effectiveness of scarce public resources by increasing overall housing output through partnership working with the private sector.
- 7.28 Policy 3.12 concerns the negotiation of affordable housing. It is stated that the maximum reasonable amount of affordable housing should be sought when negotiating on individual private residential and mixed use schemes.

Draft New London Plan (2019)

- 7.29 The Draft New London Plan 2019 is a ‘consolidated’ version of the draft London Plan showing all of the Mayor’s suggested changes following the Examination in Public (EiP), it was published in July 2019. However, until this document is formally adopted, it does not carry as much weight as the adopted London Plan (2016) in terms of assessing the current application. It should be noted that its general principles further reinforce the provisions of the London Plan (2016).
- 7.30 The Planning Inspectorate published its ‘Report of the Examination in Public of the London 2019’ on 8th October 2019. The Mayor of London may propose not to accept any recommendation in the Inspectors Report.
- 7.31 The London Plan Examination in Public Panel Report Appendix: Panel Recommendations (October 2019), sets a 10-year target for net housing completions within LBWF between 2019/20-2028/29 of 12,640 or 1,264 homes per annum. This is significant increase from the 862 homes per annum target within the current London Plan. Draft London Plan Policies H1 and H3 seek and increase in housing supply across London, particularly through intensification of brownfield land, in line with the above figures.
- 7.32 Draft Policy GG4 identifies that to create a housing market that works better for all Londoners, those involved in planning and development must ensure that more homes are delivered and support the delivery of the strategic target of 50% of all new homes being genuinely affordable.
- 7.33 Draft Policy H5 again confirms that the strategic target is for 50% of all new homes delivered across London to be genuinely affordable. The policy confirms that ‘genuinely affordable’ housing is defined in the NPPF. The NPPF is clear that homes which are sold at a discount of at least 20% below local market value are affordable homes.

- 7.34 Draft Policy H6 identifies a threshold approach to the provision of residential planning applications, which requires a minimum of 35% on-site affordable housing. Applications that exceed 35% and meet a required affordable housing tenure split can follow a 'Fast Track Route'. The policy states that "*Developments which provide 75% or more affordable housing may follow the Fast Track Route where the tenure mix is acceptable to the Borough or the Mayor where relevant*".
- 7.35 Draft Policy H7 relates to the tenure of affordable housing. The policy provides more flexibility for Boroughs to determine the appropriate tenure split for affordable housing. Paragraph 4.7.12 states that "*the affordable housing tenure split in Policy H7 should be considered as the starting point for negotiations. It will, however, be for the Borough, and the Mayor where relevant, to decide if there should be a greater number of affordable homes, or fewer homes at a deeper discount.*"
- 7.36 Draft London Plan Policy GG2 emphasises the need to make the best use of land to cater for London's growing population. This should be achieved by creating places of higher density in appropriate locations to achieve more from limited land supplies.
- 7.37 Draft Policy D6 seeks to optimise housing density, with the Draft London Plan placing greater emphasis on a design-led approach to density assessments, with consideration given to site context, public transport, walking and cycling accessibility and the capacity of surrounding infrastructure. The policy also states that proposed residential development that does not demonstrably optimise the housing density of a site in accordance with the policy should be refused.
- 7.38 Draft London Plan Policy D5 requires that 10% of new dwellings to meet Building Regulation requirement M4(3) 'wheelchair user dwellings'.
- 7.39 Draft London Plan Policy T6.1 requires that for 3% of dwellings, at least one designated accessible persons parking bay should be available from the outset. The policy then sets out that developments can demonstrate, as part of a Parking Design and Management Plan, how an additional 7% of dwellings could be provided with designated accessible parking spaces if there is future demand.
- 7.40 Draft London Plan policy T5 revises the cycle parking standards, differentiating between 1 bed 1 person dwellings and 1 bed 2 person dwellings. As a result, 1 bed 1 person dwellings are required to provide one cycle space per 1 bed dwelling.
- 7.41 Draft London Plan Policy S12 requires major development to be net zero-carbon and sets the following energy hierarchy:
- 1) be lean: use less energy and manage demand during operation.
 - 2) be clean: exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly.
 - 3) be green: maximise opportunities for renewable energy by producing, storing and using renewable energy on-site.

Homes for Londoners: Affordable Housing and Viability SPG (2017)

- 7.42 The Mayor's Affordable Housing Viability provides flexibility to incentivise schemes that are largely or entirely affordable, especially those that propose 75% (or above) affordable housing.
- 7.43 Paragraph 2.42 highlights that whilst *"the preferred tenure split should be considered as the starting point for negotiations, it will be for the LPA, and the Mayor where relevant, to decide if a different tenure mix could support a greater number of affordable homes."*
- 7.44 Paragraph 2.40 states that the Mayor is keen to maintain flexibility in tenure to meet local needs while ensuring the delivery of his preferred affordable products (which include intermediate affordable products).

7.45 LBWF Core Strategy (2012)

- 7.46 Policy CS2 concerns improving housing quality and choice. In relation to housing growth, the policy provides that the Council will facilitate sustainable housing growth by prioritising development on previously developed land, particularly unused or underused land, making effective and efficient use of land by seeking to optimise housing densities and supporting initiatives to bring 1035 empty properties back into use over the plan period.
- 7.47 In relation to affordable housing, policy CS2 identifies that the Council will maximise the number of quality affordable homes within the Borough by aiming to provide at least 5,700 affordable homes over the plan period (50% of the total number of homes). The level of affordable housing will be assessed on a site-by-site basis.
- 7.48 Policy CS2 refers to creating mixed and balanced communities by seeking a range of home sizes and tenures in new development. High quality design will be required and new homes should be accessible to all members of the community. At paragraph 5.12 it is stated that *"Given the urban nature of large parts of the Borough it is essential to make the most effective and efficient use of land in order to maximise housing supply. As a general rule, the Council will seek to optimise housing densities across the Borough"*. Paragraph 5.18 states that *"given the significant level of need and the difficulties local residents have in accessing the housing market, the Council seeks to prioritise the delivery of affordable housing"*.
- 7.49 Paragraph 5.19 outlines that *"the Council wants to encourage a more economically balanced community and will therefore seek a greater social mix in the Borough. Waltham Forest has experienced a trend of more people on higher and medium incomes moving out of the Borough than are moving in. This is largely due to the fact that they are unable to find suitable housing options to meet their needs"*.
- 7.50 Policy CS4 concerns minimising and adapting to climate change. The Council will tackle climate change locally and promote resource efficiency and high environmental

development standards during design, construction, and occupation of new developments.

- 7.51 Policy CS5 concerns enhancing green infrastructure and biodiversity. Amongst protecting existing green spaces, the Council will ensure the adequate provision of allotments and other spaces to grow food and plants.
- 7.52 Policy CS6 relates to promoting sustainable waste management and recycling. The Council will require new development to provide accessible, adequate and well-designed storage facilities for residential waste and recycling.
- 7.53 Policy CS7 concerns developing sustainable transport. The Council will facilitate growth and regeneration in a sustainable manner and promote sustainable travel. Car-free developments will be promoted.
- 7.54 Policy CS15 relates to well designed buildings, places and spaces. It states that the Council's objective is to create positive, responsive and inclusive environments including buildings and spaces of high quality that contribute to the distinctiveness of neighbourhoods.

LBWF Development Management Policies (2013)

- 7.55 Policy DM1 provides that the Council will take a positive approach to considering development proposals that reflect the presumption in favour of sustainable development within the NPPF. The Council will work proactively with applicants to find solutions.
- 7.56 Policy DM3 concerns affordable housing provision. In accordance with Core Strategy Policy CS2, the Council aims to ensure 50% of new housing is affordable.
- 7.57 Policy DM5 concerns housing mix. It is stated that the Council will seek housing developments to provide a range of dwelling sizes, with a focus on the provision of larger family sized homes.
- 7.58 Policy DM7 relates to external amenity and internal space standards. The Council will aim to ensure that all new residential development, is of the highest quality both internally and externally by seeking that proposals meet the Council's minimum internal space standards and the external amenity space standards.
- 7.59 Policy DM9 relates to specialist housing and identifies that the Council will provide protection against proposals involving a loss of specialist housing. Proposals involving the loss of specialist accommodation may be acceptable where, for instance the existing accommodation will be adequately re-provided elsewhere; and it can be demonstrated that the existing accommodation is incapable of meeting contemporary standards.
- 7.60 Policy DM10 concerns resource efficiency and high environmental standards. The Council will require developments to achieve the Council's stepped targets towards zero carbon by 2016 for residential development.

- 7.61 Policy DM11 concerns decentralised and renewable energy. It is stated that the Council will seek to reduce carbon emissions by requiring development to examine the feasibility of connecting to existing or future decentralised energy networks. Developments which seek to reduce carbon emissions through on-site renewable energy should ensure that the proposed system is appropriate and does not cause adverse effects.
- 7.62 Policy DM13 requires the co-ordination of land use and transport. The Council will ensure that development is properly integrated with the transport network and is supported by appropriate walking, cycling and public transport links. Where development is not within easy reach of public transport stops, applications will be required to promote sustainable travel measures and contribute to reducing car use.
- 7.63 Policy DM16 concerns car parking. The Council encourages car-free development in highly accessible locations and supports on-site car parking spaces designed for disabled people.
- 7.64 Policy DM29 concerns design principles, standards and local distinctiveness. The Council will expect a high standard of urban and architectural design for all new development. Proposals should be supported by a clear and robust design rationale based on a sound understanding and analysis of local context and character, whilst reinforcing or enhancing local character and distinctiveness and responding to the site's context in terms of scale, height, and massing.
- 7.65 Policy DM32 states that when considering the impact of a new development on residential amenity the Council will have regards to impacts on daylight and sunlight, outlook and privacy of surrounding properties.

8. Planning Assessment

Principle of Development

- 8.1 The lawful planning use of the Site is as a residential care home (C2 Use Class). However, the property has been vacant since June 2018.
- 8.2 Part B of Development Management Policy DM9 states that the loss of specialised housing is acceptable where:
- i) It can be demonstrated that there is a surplus of that form of accommodation in the area and is no longer required;
 - ii) The existing accommodation will be adequately re-provided to an equivalent or greater standard elsewhere; and
 - iii) It can be demonstrated that the existing accommodation is incapable of meeting contemporary standards of care.
- 8.3 In response to point i), it should be noted that the care home was closed in June 2018, however there is a good provision of care homes in the local area. These are identified within Figure 1 below. Each care home shown in Figure 1 is listed below in Table 1 'Local Care Home Provision'.

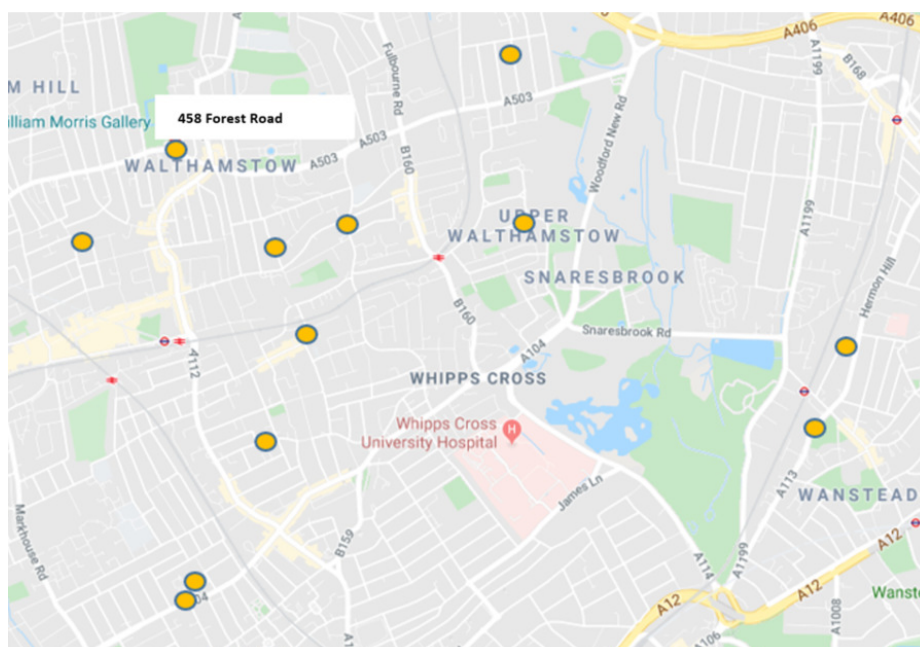


Figure 1: Locations of local care homes

Care Home Name	Address	No. of Service Users
Parkview House	206/212 Chingford Mount Road, Chingford, London E4 8JR	45
Homesdale	5/7 New Wanstead, Wanstead, London E11 2SH	18
Forest Dene Residential	48 Hermon Hill, Wanstead, London E11 2AP	36
Forest View	45 Upper Walthamstow Road, Walthamstow, London E17 3QG	24
Albany Nursing Home	11/12 Albany Road, Leyton, London E10 7EL	61
Aspray House	481 Lea Bridge Road, Leyton, London E10 7EB	64
George Mason Lodge	Chelmsford Road, Leytonstone, London E11 1BS	39
107/109 Grove Road	Walthamstow, London E17 9BU	9
Alliston House	Church Hill Road, Walthamstow, London E17 9RX	43
Edward House	7 Cottenham Road, Walthamstow, London E17 6RP	3
Ashbridge Lodge	5 Ashbridge Road, Leytonstone, London E11 1NH	5
1 Summit Road	Walthamstow, London E17 9LR	6
70 Castleton Road	Walthamstow, London E17 4AR	6
Highcroft Care Home	13/15 Rectory Road, Walthamstow, London E17 3BG	19
The Grove	72 Grove Road, Walthamstow, London E17 9BN	8
		Total: 386

Table 1 Local Care Home Provision

8.4 Table 1 demonstrates that there is provision for approximately 386 service users across 15 facilities in the local area. There are also numerous other care home facilities further afield. Although there will be a small loss of provision, it is considered to be ‘de minimis’ in the context of the local care home provision.

- 8.5 Point ii) of Policy DM7 states that the Council will support the loss of the existing specialist accommodation where it is adequately re-provided to an equivalent or greater standard elsewhere. The building has been vacant since June 2018 and the 51 previous residents that were cared for at the site have been relocated to alternative facilities. Officers have made us aware that the Council are preparing plans to develop two care homes within the local area. These purpose built, new care homes will deliver additional accommodation within the Borough that will provide modern standards of care, of a far greater standard than the existing building on Site.
- 8.6 Point iii) of Policy DM7 sets out that proposals should demonstrate that the existing accommodation is incapable of meeting contemporary standards of care. In November 2017, the care home was inspected by the Care Quality Commission and its formal report was published in early 2018. The report showed that the care facility 'required improvement' in each of the five categories against which it was assessed, and scored 'inadequate' against the category "Is the service safe?". The care home was permanently closed shortly after the Care Quality Commission's report was published.
- 8.7 Further to this, the size of the vacant care home (54 beds) is considered to be too small for operators and developers in the care sector. Purpose built new care homes are typically provide over 70 beds with 100% en-suite wet room provision as this ensures efficiency in staffing and running costs. There has been a trend of closures of smaller scale care due to diminishing profitability under ongoing fee pressure and increasing staff costs. The agents who led the disposal have advised that there were twenty viewings of the property with no interest from care home operators.
- 8.8 LBWF's pre-application response from July 2019 sets out that the Council's Adult Social Care Officers have confirmed that the existing building is no longer fit to provide sufficient modern standards of care without significant investment. Given these circumstances, it appears very unlikely that the care home use would resume at the Site.
- 8.9 The redevelopment of the site for a 100% affordable housing scheme would provide an over-riding public benefit. At a London-wide and local level, a strategic objective is to increase the supply of high quality homes and ensure that new housing meets local needs and aspirations. LBWF Core Strategy Policy CS2 sets out that the Council will work to exceed housing targets. The London Plan: Panel Recommendations (October 2019), set a 10 year target for net housing completions for LBWF between 2019/20-2028/29 of 12,640 or 1,264 homes per annum.
- 8.10 London Plan Policy 3.3 outlines that the Mayor recognises the pressing need for more homes in London in order to promote opportunity and provide a real choice for Londoners in ways that meet their needs at a price they can afford. The policy emphasises that boroughs should seek to achieve and exceed the relevant minimum borough annual average housing targets. Equally, Draft London Plan policy D6 (optimising housing density) requires that development proposals make the most efficient use of land to be developed at optimum densities.

- 8.11 The Council's Core Strategy (paragraph 5.3) recognises that a growing population in the Borough, along with smaller household sizes, are fuelling significant demand for new homes to buy and rent.
- 8.12 There is limited land within LBWF to accommodate significant population growth. The Core Strategy (paragraph 5.12) recognises that "*given the urban nature of large parts of the Borough it is essential to make the most effective and efficient use of land in order to maximise housing supply*". Optimised development on sites such as 458 Forest Road is therefore vital to contribute towards meeting the Council's housing targets.
- 8.13 Policy CS2 outlines that the Council will facilitate housing growth by maximising the number of quality affordable homes in the Borough by prioritising development on previously developed land, particularly on unused or underused land; making effective and efficient use of land by seeking to optimise housing densities. In summary, the existing building at 458 Forest Road makes an inefficient use of the existing vacant site. The Council's Adult Social Care Officers acknowledge in their pre-application response that the existing building is no longer fit for to provide modern standards of care, without significant investment. The loss of the care home is therefore sustainable in this instance, recognising the pressing local need for affordable housing to be delivered.

Mix of homes

- 8.14 A report titled "Analysis of Potential Need for Pocket Living Product in London Borough of Waltham Forest" prepared by Cobweb Consulting is submitted with this planning application. The analysis shows that LBWF is the fifth least affordable authority in the country for first time buyers, who have to pay an average of £423,138 to get a foot on the property ladder. As this is out reach for a large proportion of the Borough's population many households are forced to rent, or to move out of LBWF to cheaper areas to buy, often removing a younger and dynamic section of the population.
- 8.15 The Office for National Statistics (ONS) affordability data shows that the overall ratio of median house prices to median workplace gross incomes in LBWF is 14.85. This is the sixteenth highest ratio of the thirty-three London boroughs, but the tenth highest percentage increase in the ratio since 2018 (by 65%).
- 8.16 LBWF is a Borough with a relatively young population. As a result of its age structure, a high level of gross household formation is projected over the next decade, amounting to 3,188 new households per annum. Of these, 1,316 households will be single person households who require one-bedroom homes. Household incomes in LBWF are not exceptionally high by London standards.
- 8.17 The Mayor's London Plan Annual Monitoring Report (2017-2018) assumes that 40% of a purchaser's income can be used on housing. Research by Shelter shows that in LBWF, for private renters, this tends to be considerably higher, at 57%. On the assumption that they will devote 40% of their income to housing costs, about 40% of the 1,316 newly forming single person households (526 households per annum) could afford to purchase

the Pocket product of a one-bedroomed flat offered at £288,000 (incorporating the 20% market price discount), based on current property valuations.

- 8.18 There is strong interest locally in low cost ownership initiatives: there are 2,391 applicants on the Share to Buy Register from LBWF, and 652 eligible applicants on Pocket's own register.
- 8.19 However, only 11% of owned or shared ownership homes in the William Morris ward (where the Site is located) are one-bedroom homes, compared to 20% social rented homes and 26% private rented homes. Across LBWF as a whole the shortage of one bedroom home ownership is even more acute, with only 8% of owned and shared ownership homes comprising one bedroom homes.
- 8.20 The report prepared by Cobweb Consulting identifies, using a comparative Shared Ownership development of exactly the same market value and an example privately rented one bedroom flat, that a Pocket home within the proposed development would be more affordable than shared ownership or private renting in the Borough. The monthly cost of a Pocket home would be 70% of the cost of private renting and 60% of that of shared ownership.
- 8.21 The GLA Annual Monitoring Report (2017-2018) states that average housing costs for Shared Ownership and Discounted Market Sale, including service charges, should be no more than £1,311 a month or £303 a week, calculated on the basis of 40% of net income, with net income being assumed to be 70% of a gross income of £56,200.
- 8.22 Pocket's model of one bedroom homes are aimed mainly at single people who are first time buyers with incomes under the Mayor of London's affordable housing threshold. The Cobweb Consulting report assesses the affordability of comparative housing options within LBWF. The report identifies that the housing costs for the Pocket product would be 42% below the GLA maximum threshold, whilst the comparable Shared Ownership product would be at 97% of the maximum threshold. It is clear that Pocket Homes would help meet the significant demand for one bedroom homes for first time buyers, and are more affordable than alternative options such as Shared Ownership or private renting, as demonstrated in Figure 1, below.

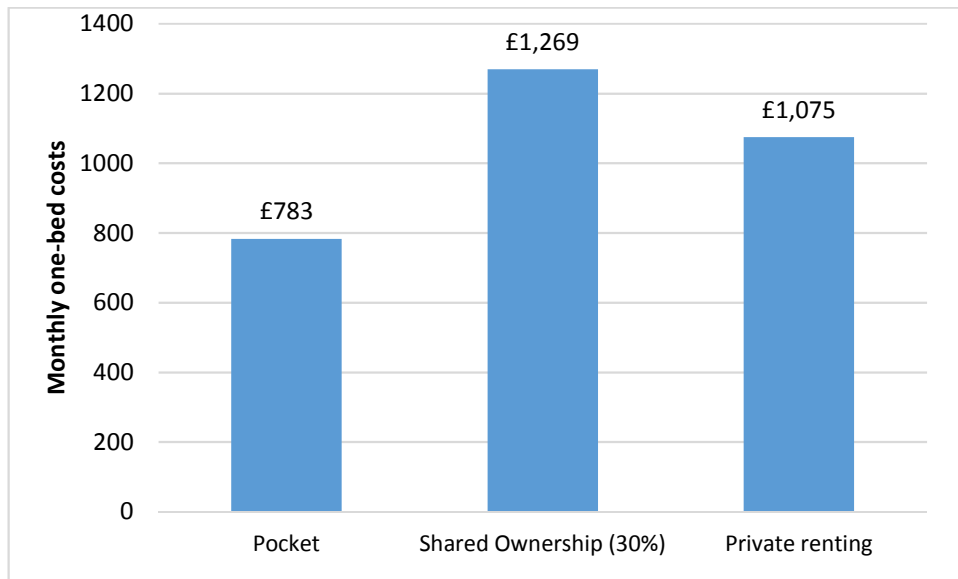


Figure 1: Figure 5 Monthly housing costs for different tenures.

Sources: Pocket, Share to Buy website (SO), VOA (private)

- 8.23 When considering the delivery of affordable housing and the proposed mix of homes, it is important to understand the strategic housing demands across the Borough. Housing need within LBWF was assessed in the Strategic Housing Market Needs Assessment (SHMA) (2017) as a requirement for 1,810 dwellings per annum over the period 2014-2039. As previously mentioned, house prices within the Borough have risen sharply in recent years, suggesting a high degree of pressure within the housing market.
- 8.24 The SHMA identifies a substantial shortfall in the provision of affordable tenures of residential accommodation. The assessment identifies a requirement to deliver 1,258 affordable housing units which represents 69% of the overall Objectively Assessed Need (OAN) for the Borough. The SHMA identifies that 38% of the net future annual affordable housing need is for housing at social rented sector rent levels, with about 1% of demand for housing at London Affordable Rent levels, and 61% for intermediate tenures. The report by Cobweb Consulting confirms that within LBWF, the overall development of intermediate market homes as a proportion of all affordable homes only amounted to 18% in 2017-18.
- 8.25 This is demonstrated within the Council's Building for the Future (2015) document which highlights LBWF's strategy to target middle and modest income households who are priced out of home ownership. This population does not meet the criteria required to be allocated to social housing, yet cannot afford the Borough's high house prices. The strategy also states that this proportion of the population is economically vital for LBWF and therefore it is important to support their housing needs.
- 8.26 The Core Strategy at paragraph 5.19 also highlights the role that retaining existing and encouraging new households on higher and middle incomes has in improving the Borough's social fabric. It states "*The Council wants to encourage a more economically*

balanced community and will therefore seek a greater social mix in the Borough. Waltham Forest has experienced the trend of more people on higher and medium incomes moving out of the Borough than are moving in. This is largely due to the fact that they are unable to find suitable housing options to meet their needs. The Council wants to make the Borough a place where high and middle income people choose to live and can afford. The Council aims to secure housing suitable for households across a wide range of incomes to provide local residents with the opportunity to settle and progress up the home ownership ladder.”

- 8.27 Whilst there is an identified need for affordable family sized homes, there is an evidenced need for smaller sized homes too. The SHMA highlights that the characteristics of LBWF are changing from an area, which was once family focussed, towards an area catering for a growing single, professional population. As this population grows, it will be necessary for the Borough to cater for the growing demand for smaller affordable units.
- 8.28 The SHMA provides estimates of dwelling size requirements by considering changes in the projected composition of household types which can then be taken into account in determining future size requirements. One reason for the projected increase in requirements for larger bedroom units is presented as a reflection of the growing trend towards multi-adult households, as opposed to the need for family sized dwellings.
- 8.29 The SHMA outlines that the growth of multi-adult households is considered to be a result of poor affordability, as a greater number of local professionals are unable to afford to buy or rent alone within the private market and, as a consequence, turn to house shares. If there were a greater choice of affordable housing products which catered for the needs of this population, it is most likely that the demand for larger-bedroom multi-adult households would decrease as a greater number of people would be able afford to own a home as a single person.
- 8.30 LBWF commissioned a research document titled Housing for Young People in Waltham Forest (2017). The research investigated the housing needs of young people, and the trade-offs that people are willing to make so that local young people continue to call LBWF their home.
- 8.31 The document identified that aspirations for home ownership were high amongst young people, however the majority felt that home ownership in the Borough would be out of their reach. In response to the research, LBWF concluded that many young people in the Borough face severe housing pressures and as such there is a vital need to improve the range of housing options for young people, including increasing the amount of affordable housing within the Borough.
- 8.32 Development Management Policy DM5 states that the Council will seek all housing developments to provide a range of dwelling sizes particularly focusing on the provision of larger family sized homes (3-bed plus) in line with the Council's preferred housing mix table, which identifies greatest demand for 2 and 3-bed homes.

8.33 Pocket's model of delivering 100% affordable homes in developments that are exclusively 1-bedroom homes is not fully in accordance with this policy. In evaluating this it must be recognised that the Pocket model relies on the dwelling mix being 1-bed only, but that the delivery of 100% affordable homes is a significant material consideration that outweighs any conflict with the Council's policy. Other material considerations that must be weighed against the Council's preferred dwelling mix include:

- The provision of 90no. high quality affordable homes on a site that if developed by a traditional developer would yield far fewer dwellings and a lower quantum of affordable housing;
- The provision of affordable homes for existing residents or workers in the Borough on low and medium incomes (priorities to be agreed with LBWF);
- Provision of a large number of homes which would remain affordable in perpetuity (governed by the s106 agreement and Pocket's role as administrator);
- A 10 year commitment to reinvest the Mayor's funding and Pocket's own development profits from the redevelopment into further affordable Pocket development; and
- A realistic and prompt timescale for delivery of new Pocket homes - the proposed development can be delivered quickly with minimal disruption to existing neighbours.

8.34 It is also a significant material consideration that locally, both Hawthorne and Gaywood Roads which the Site borders are characterised by three or four bed single family houses. National and local planning policies seek to achieve a mix of unit sizes not just within a single building, but across the local area. In this instance, it is considered that the introduction of a development providing smaller residential homes will complement and balance the prevailing local mix on Hawthorne and Gaywood Roads which consist of primarily three and four bedroom family houses.

8.35 At present, nearly half of the homes in the William Morris Ward (in which the Site is located) are owner-occupied. Of these, only 11% are one-bedroom homes. The ward overwhelmingly consists of family sized accommodation, particularly in the owner-occupier sector, where 47% of homes are three-bed or larger. Across the whole Borough, whilst over half the homes are owner-occupied, only 8% of these are one-bed. Nearly two-thirds of the owner-occupied stock are three-bed or larger. There is demand for one bedroom homes in the Borough and the introduction of smaller homes on this Site will complement and balance the local mix of dwellings.

8.36 In 2018, LBWF Officers approved planning applications at Naseberry Court, Chingford (LBWF ref: 18224) and Lena Kennedy Close, Chingford (LBWF ref: 182029). In approving both planning applications, Officers confirmed that as the immediate area of both sites comprised a high number of single-family dwellings of different sizes the proposals, which contained high proportions of smaller units, would add to the variety of housing on offer in the area. For this reason, the small units were considered to complement the local housing offer and Policy DM5 was applied flexibly.

- 8.37 Similarly, a planning application for proposals at Land adjacent to 5 Spruce Hills Road, E17 (LBWF ref: 183568) was approved in 2019. The Officer report confirms *“It is noted the proposed development solely consists of units that are one bedroom and two-bedroom units. The unit mix has been carefully considered and designed to optimise affordable housing delivery on the site whilst taking account of the specific locational characteristics of the surrounding area”*.
- 8.38 LBWF applied Policy DM5 flexibly because it enabled the applicant to optimise affordable housing delivery. The approved development provided 50% affordable housing (6 homes). In comparison, the development at Forest Road will provide 100% affordable housing (90 homes).
- 8.39 Pocket’s previous development within LBWF at Gainsford Road, which consisted of 100% 1-bed homes, proved very popular. All homes were sold before the construction of the building was completed, and this demonstrates that there is high demand for Pocket homes within the local area. In determining that application (LBWF Ref: 161661) Officers confirmed *“In this instance the proposed the uniform mix of one-bedroom dwellings is a key element in ensuring that Pocket developments are viable and affordable for the end user. The proposals are consistent with London Plan policies 3.3 (increasing housing supply) and 3.4 (optimising housing potential). Viability is also a consideration in this respect. Provision of larger homes within Pocket developments compromises the model by reducing the overall number of units impacting on the viability of the scheme as a whole. On balance the proposed mix of the units would be supported.”*
- 8.40 Overall, there is a clear and evidenced need to provide more affordable intermediate housing in the Borough. In particular, there is an identified need for housing which meets the needs of local people who wish to stay living in LBWF yet are unable to get onto the Borough’s private housing market. The provision of smaller sized homes within the proposal will help meet this great need by providing homes which are tailored to the social-economic profiles of first time buyers within the Borough. For these reasons, any conflict with policy DM5 is outweighed by the benefits of a 100% affordable 100% one-bed Pocket development.

Affordable Housing

- 8.41 Development Management Policy DM3 sets the Council’s aim to provide a minimum of 50% of new housing as affordable. The proposal will provide 100% affordable housing, significantly exceeding the Council’s policy target and complying with the Council’s aspirations to provide as many affordable homes as possible.
- 8.42 All of the proposed new homes would be intermediate affordable tenure, which should be considered against the requirement of policy DM3 which seeks tenure splits of 60% social/affordable rented homes and 40% intermediate homes. Notwithstanding this, Draft London Plan policies, and the Mayor’s Viability SPG are both clear that, in order to facilitate the delivery of a greater quantum of affordable housing, especially where sites

can deliver 75% or more affordable housing, an element of flexibility in decision making can be applied.

- 8.43 Draft London Plan Policy H7 relates to the tenure of affordable housing. Paragraph 4.7.12 states that *“the affordable housing tenure split in Policy H7 should be considered as the starting point for negotiations. It will, however, be for the Borough, and the Mayor where relevant, to decide if there should be a greater number of affordable homes, or fewer homes at a deeper discount.”*
- 8.44 Similarly, Paragraph 2.42 of the Mayor’s Viability SPG sets out that, whilst the preferred tenure split should be considered as the starting point for negotiations, it is for the LPA to decide whether a different tenure mix could support a greater number of affordable homes. Paragraph 2.40 states that the Mayor is keen to maintain flexibility in tenure to meet local needs while ensuring the delivery of his preferred affordable products (which include intermediate affordable products).
- 8.45 458 Forest Road is a prime example of a site that, by applying some flexibility in terms of local mix and tenure policies, the Council can enable affordable housing delivery to be significantly boosted. This clearly accords with the intentions of the Draft London Plan, which permits Councils to apply flexibility.
- 8.46 Pocket housing is provided following a unique model that enables sites to deliver 100% affordable housing, without public subsidy, by providing all housing as intermediate housing. Inclusion of affordable housing of other tenures would compromise delivery of the model and dramatically reduce the ability of sites to bring forward the level of affordable housing provided.
- 8.47 Due to lease conditions and restrictions within the Section 106 Agreement, Pocket intermediate homes remain affordable in perpetuity for future buyers. This distinguishes them from other forms of intermediate affordable housing, such as shared-ownership, where over time owners can acquire remaining equity and finally sell the property on the open market. Once this occurs, an affordable unit is lost from the Borough’s supply. Pocket homes will always remain affordable as the same eligibility criteria would also apply to any subsequent sales, in that buyers must live or work in the Borough, be a first time home owner and earn below the Mayor’s income thresholds.
- 8.48 Recognising the Council’s demand for affordable homes and the minimum policy requirement of 50% provision of affordable homes, the proposals which will deliver 100% affordable housing are consistent with the Council’s strategic policy objectives.
- 8.49 Whilst the development requires some flexibility in the assessment against LBWF’s mix and tenure policies, significant weight must be given to the delivery of a 100% affordable housing development, optimised to provide 90 new units. The proposals seek to maximise affordable housing supply in accordance with Policy 3.12 of the London Plan and the supporting text to Draft London Plan Policies H5, H6 and H7, which require that the maximum reasonable amount of affordable housing is provided on all developments.

- 8.50 An Affordable Housing Statement prepared by Boyer has been submitted in support of the application.

Design

- 8.51 Core Strategy Policy CS15 relates to well-designed buildings, places and spaces. It states that the Council's objective is to create positive, responsive and inclusive environments including buildings and spaces of high quality that contribute to the distinctiveness of neighbourhoods. Development Management Policy DM29 concerns design principles, standards and local distinctiveness. The Council will expect a high standard of urban and architectural design for all new developments.
- 8.52 A Design and Access Statement prepared by Gort Scott Architect is submitted with the planning application. The document explains the project's design process, identifies the rationale behind the proposed design and how the proposed building responds to the specific site context.
- 8.53 The proposed building takes the opportunity to reinstate a historic building line addressing Gaywood, Forest and Hawthorne Roads which was destroyed during Second World War bombing. This helps complete the urban block and is a clear improvement from the existing building which is set-back from Forest and Gaywood Roads, breaking the street frontage.
- 8.54 The proposed development takes cues from the nearby completed Pocket project at Gainsford Road, although unlike Gainsford Road, the Forest Road site has street frontage on three sides of varying character. The proposals take inspiration from Walthamstow's association with the Arts and Crafts, William Morris, and the legacy of Warner Housing, which employs unified architectural language and detailing to create a recognisable identity across areas.
- 8.55 The proposed massing mediates between terraced houses on Gaywood and Hawthorne Roads before rising to up to four storeys at street corners to Forest Road – a main urban artery through Walthamstow. This results in a stepped massing which articulates the building form, and also creates opportunities for dual-aspect corner homes.
- 8.56 The building's principal elevation onto Forest Road has a set back fifth storey element adorned with a gently scalloped parapet. The set back storey massing is consistent with nearby residential buildings to the east of the site such as 1 Hoe Street and the Howard Mansions (516-538 Forest Road) which also front this main road.
- 8.57 The decorative elements at roof level on the Forest Road elevations have been refined since the previous pre-application design with a light, gently curved parapet profile making reference to the curved bays of the William Morris Gallery and glazed top-lights to create a lighter appearance. The elevation, which creates the building's principal volume, fronting Forest Road, benefits from articulation which effectively breaks the length of the elevation, as well as increasing the number of dual aspect homes.

- 8.58 On Gaywood Road, consideration has been given to integrate the proposed elevation with surrounding terraced houses by using ground floor bay windows to five street facing homes, further animated by gated front terraces. These features integrate the proposals with the existing street character and grain.
- 8.59 On Hawthorne Road, the proposed building provides a four-storey end to the street on the Forest Road corner, mirroring the relationship of the Aladura International Church to adjacent terraced houses and creating a bookend with the existing terraced housing.
- 8.60 The combination of brick with sculpted lintel details has been chosen as the most sympathetic material selection for the site. The main focus of this detailing will be on street facing elevations.
- 8.61 The proposed development considers the wider context in terms of public realm and seeks to improve the site's relationship to it. The building's primary entrance is situated with an existing crossing to Lloyd Park in mind, while the geometry of the proposed building and forecourt landscaping at the corner of Forest and Gaywood Roads, takes both alignments with existing buildings and the main pedestrian route from Walthamstow Central into account.
- 8.62 The entrance to the building itself, accessed from, Forest Road, creates a welcoming environment which encourages residents to dwell and interact. It is generously sized, naturally lit and provides views from the street to the rear communal residents' courtyard.
- 8.63 Located to the south of the site to maximise sunlight, the communal courtyard is landscaped and provides furniture and allotment planters to create a convivial environment. Roof terraces are also proposed at third and fourth floor levels. On street frontages, a densely and robustly-planted buffer of defensible space marked by brick retaining walls is proposed to ground floor street-facing residential homes.
- 8.64 The proposed building creates a confident frontage onto the busy Forest Road whilst responding sensitively to its context in terms of scale, as the building's massing reduces to meet the neighbouring domestic properties to the south. The building, which takes inspiration from the local area and pattern of development, will activate Forest, Hawthorne and Gaywood Roads. The development is in full accordance with Core Strategy Policy CS15 and Development Management Policy DM29.

Quality of Accommodation

Internal space standards

- 8.65 Development Management Policy DM7 outlines that new residential dwellings are expected to meet the Council's internal space standards set out within Tables 8.1 and 8.2. It is noted that the tables omit studio flats and 1 bed, 1 person homes.
- 8.66 However, the Nationally Described Space Standards (MHCLG, 2015) set a gross internal floor area of 37 sq m for 1 bed, 1 person homes. The London Plan and Draft London Plan

sets identical minimum space standards as those within the Nationally Described Space Standards.

- 8.67 As noted within the Schedule of Areas within the Gort Scott's Design & Access Statement the majority of proposed homes within the development are 1 bedroom homes measuring 38sqm. 8 of the proposed homes are 1 bed, 1 person wheelchair accessible homes and measure 50 sqm.
- 8.68 As alluded to previously, the Pocket model, including the design of the 1 bed, 1 person homes, is endorsed by the Mayor of London in full recognition of Policy 3.5 of the London Plan. The homes exceed space standards and have been carefully designed to maximise usable space and provide a light, pleasant and efficient environment. The design is continually evolving to respond to customer feedback and new innovations
- 8.69 Provision of a development of 100% affordable housing, without public subsidy is a significant material consideration in recognition of policies CS3 and DM3 which state that the Council will maximise the number of new affordable homes. The new Pocket homes will remain affordable in perpetuity. The S106 agreement ensure that they are not available to buy-to-let owners or those who already own a residential property and they can never be sold on the open market.
- 8.70 This type of development is specific to the Applicant (Pocket) and distinguishes Pocket from other developers. For these reasons the Council can distinguish between Pocket and any other proposals for a development with a uniform mix of 1-bed, dwellings that the Council may find unacceptable.

Standard of Accommodation

- 8.71 As a result of the Site's constraints and shape, including its long Forest Road frontage it is an inevitability that a redevelopment of this size will include some single aspect dwellings. However, since the initial pre-application meeting, a significant amount of design work has been undertaken to ensure that the number of north-facing single aspect homes have been reduced to 11 (12% of all homes). A full breakdown of the aspect of homes is included in Gort Scott's Design and Access Statement.
- 8.72 There is now only one north-facing, single aspect home at ground floor, which is set behind generous defensible space, and does not face directly onto Forest Road. An Internal Daylight Assessment prepared by Point 2 is submitted with the application and demonstrates that all homes exceed BRE guidance for internal light receipt.
- 8.73 The Mayor's Housing SPG at 2.3.39 sets out that, whilst north facing single aspect dwellings should be avoided wherever possible, in applying this, consideration should also be given to other planning and design objectives for a site. Accordingly, relevant planning weight should be given to the optimisation of the site to provide a 100% affordable housing development.

- 8.74 In relation to the remaining single aspect homes, the Mayor's Housing SPG is clear that the focus is on avoiding large, single aspect homes with three or more bedrooms. 2.3.40 of the document confirms that *"Good single aspect one and two bedroom homes are possible where limited numbers of rooms are required, the frontage is generous, the plan is shallow, the orientation and or outlook is favourable, and care is taken to mitigate the potential for overheating"*.
- 8.75 The design of the north-facing homes, which are primarily on the building's upper floors, benefit from good outlook, do not have deep floorplans, have two habitable rooms, and generous windows to maximise natural light. An Internal Daylight Assessment prepared by Point 2 is submitted with the application and demonstrates that all homes comply with the BRE guidance on internal light receipt.
- 8.76 The Mayor's Housing SPG does not discourage single aspect south facing homes. An Overheating Strategy prepared by XCO2 is submitted with the planning application. The Strategy identifies recommended mitigation measures, such as the use of lower G-value glazing, night-purge ventilation features and ventilation panels, to ensure that none of the homes within the development overheat. These measures have been included within the detailed design.
- 8.77 It is important to consider that single aspect homes are a facet of the Pocket model required to maximise the delivery of affordable housing on the Site. A small number of north facing, single aspect homes are an inevitability. However, Pocket homes have a highly refined internal layout which minimises internal corridors and maximise the homes' glazing to improve outlook and natural light receipt, mitigating against the north facing aspect.
- 8.78 As Pocket homes are a 'for sale' product, there is buyers' choice on many elements, one of which being the orientation of the property which a prospective purchaser chooses to buy.
- 8.79 Floor to ceiling heights within all primary habitable areas are at least 2.5m. This accords with the requirements for the standard of accommodation as set by London Plan Policy 3.5.
- 8.80 The proposals have focussed on providing a single, high quality core which is generously spaced to create a welcoming environment. The intention is that the shared core helps develop a community feeling within the development; a key principle of Pocket developments. The quality of the space is discernible from the generously sized, naturally-lit stairwell which provides views out on all floors.
- 8.81 At first and second floors, the core serves up to 12 homes on each wing with a total of 23 homes per floor. Whilst it is noted that the Mayor's Housing Guidance SPG (2016) recommends 8 units per core are provided in residential schemes, it should be noted that the guidance is intended to prevent long, dark and anonymous corridors. A benefit of the compact size of Pocket homes is that the corridors are not excessive in length.

- 8.82 The Mayor's Housing guidance relates to mixed unit schemes with cores that are likely to supply 4, 3 and 2 bed units, which would have a higher number of residents. In this instance, every home is a 1 bed, 1 person home meaning that the number of residents using the core is lower than it would be for a more standard market housing development with a mix of unit sizes.
- 8.83 The proposed development provides urban design benefits by reinstating the previous building line to address Forest Road. Whilst, a consequence of this is that windows for the new homes are proposed at ground floor fronting onto Forest Road, since the initial pre-application enquiry, significant design work has been undertaken to reconfigure the ground floor layout to ensure that the homes have sufficient defensible space.
- 8.84 The building entrance has been re-located to a more prominent Forest Road location which will provide additional animation and activation onto the street. In addition, the waste storage, energy centre and substation have been re-located. As a result, only a single home directly faces Forest Road at ground floor. This is set behind defensible space and benefits from a second aspect, facing north-east.

Wheelchair Accessible Dwellings

- 8.85 The Design and Access Statement prepared by Gort Scott Architects includes an Access Statement. This details the key design philosophy for the development to achieve an inclusive environment throughout. Issues relating to access and inclusion have been and will continue to be, considered throughout the design process. This includes details identifying the provision of accessible low level bins, if required by a future wheelchair users.
- 8.86 Policy 3.8 London Plan requires that 10% of new housing should be designed as M4(3) "wheelchair user dwellings". Policy D5 of the Draft London Plan has the same 10% requirement, whilst the remaining dwellings should be M4(2) "accessible or easily adaptable" compliant.
- 8.87 The proposed provides 8no. 1 bed M4(3) wheelchair accessible residential homes, equating to 9%. Drawings demonstrating the new homes' compliance with both Part M4(2) and Part M4(3) have been reviewed by the Access Consultant, and are included within the Design and Access Statement.
- 8.88 In LBWF, there are currently 2,402 households registered with the Mayor of London's First Step Scheme with a maximum of 2 occupants whose earnings match the qualifying criteria for a Pocket flat. Of these applicants, only 47 have a wheelchair within their household. This represents less than 1% of the total.
- 8.89 Furthermore, the demand for wheelchair accessible homes amongst buyers of traditional intermediate affordable housing is exceptionally low. This is consistent with the numbers in other boroughs where Pocket has previously obtained planning permission. Of all the Pocket registrants, there is only a demand from 0.3% for wheelchair accessible homes.

- 8.90 Anecdotal evidence from housing departments within other boroughs where Pocket has a presence is that demand for one-bedroom intermediate-affordable wheelchair accessible homes is exceptionally low. In addition, Pocket have only sold two Pocket homes to a wheelchair registered person in the history of the company.
- 8.91 For the reasons set out above the slight under-provision of 8 x 1 bedroom M4 (3) “wheelchair user” homes would be more proportionate to the anticipated need.

Amenity space and landscaping

- 8.92 Development Management Policy DM7 requires a minimum of 10 sqm amenity space to be provided per bedroom. (e.g: 2 bed flat - 20 sqm and 3 bed flat - 30 sqm). Each flat should provide an element of private amenity space, however the overall provision can be provided in the form of both private amenity space and communal amenity space
- 8.93 The proposed development provides areas of both communal and private external amenity space. The largest area of communal space will be provided in the form of a high quality central courtyard area for residents. This valuable amenity space will be south facing and will provide a communal destination for residents featuring relocated strawberry trees, planters, and a range of opportunities for socialising, relaxing and gardening.
- 8.94 The communal areas are designed to be of a high quality and will be functional and adaptable to a range of recreational activities to facilitate social interaction and community living. The provision of raised growing beds will give residents the opportunity to grow their own produce, encouraging a social and healthy community. Other areas of the residents’ courtyard have been identified as flexible space that could be used for additional seating or animated by games such as table tennis.
- 8.95 Landscaped roof terraces are located at third and fourth floor of the development providing additional shared amenity space for the residents. The terrace layouts aim to maximise amenity space and planting whilst considering safety and neighbours’ privacy by setting the planters away from the balustrade edge. Large planters will be planted with a mix of biodiverse species and multi stem trees to provide height and seasonal interest. Integrated benches and moveable furniture offer ample seating to relax or socialise.
- 8.96 Five private terraces are provided to ground floor homes fronting both Gaywood Road and the communal central courtyard. The private terraces provide defensible space from Gaywood Road whilst terraces facing into the courtyard will benefit from screens planted with climbers to provide privacy between neighbouring terraces.
- 8.97 The communal spaces would be accessible to all future residents and have been carefully designed as part of a high quality landscape design prepared by BD Landscaping and further details are provided within the Design and Access Statement.

8.98 The development provides 762 sqm of communal amenity space and, in total with the inclusion of private amenity space, will provide 943 sqm. This exceeds the LBWF requirement of 900 sqm.

8.99 The supporting text to Policy DM7 states that external space standards will be considered on a site by site basis. The Council will take a flexible approach when applying the external space standards. Where appropriate, the Council will consider (amongst other characteristics), the Site's access to shops, public transport, public services, community facilities, parks and green spaces.

8.100 The Site is very well served by public transport and numerous shops and amenities are within a short walking distance. Lloyd Park, which provides a range of facilities is also located opposite the Site. The park provides a café, play area with equipment for all ages, natural play area, outdoor gym, tennis courts, basketball courts, outdoor table tennis, petanque court, skate park, bowling green, formal gardens, moat and island, nature area, community room, Lloyd Park studios and the William Morris Gallery.

The proposed main entrance to the site is from Forest Road, with high quality paving forming an attractive and robust frontage to the street. At the corner of Forest Road and Gaywood Road the landscape has been maximised to provide space shade tolerant biodiverse planting beneath a semi-mature replacement Tulip tree.

Daylight and sunlight

8.101 Development Management Policy DM32 expects new development to ensure that daylight/sunlight, outlook and privacy is maintained for existing occupants and neighbours in their homes.

8.102 Policy 3.5 of the London Plan expects housing developments to be of the highest quality, internally and externally. Guidance on the application of Policy 3.5 is provided by the Mayor's Housing SPG (2016). The SPG echoes Policy 3.4 of the London Plan, which seeks to optimise housing output, and recognises that in achieving optimum housing delivery that *"an appropriate degree of flexibility needs to be applied when using BRE guidelines to assess the daylight and sunlight ... within new developments. Guidelines should be applied sensitively to higher density development, especially in opportunity areas, town centres, large sites and accessible locations, where BRE advice suggests considering the use of alternative targets. This should take into account local circumstances; the need to optimise housing capacity; and scope for the character and form of an area to change over time."*

8.103 The Housing SPG goes on to state that *"The daylight targets within a proposed scheme should be assessed drawing on broadly comparable residential typologies within the area and of a similar nature across London. Decision makers should recognise that fully optimising housing potential on large sites may necessitate standards which depart from those presently experienced but which still achieve satisfactory levels of residential amenity."* And further it states that *"BRE guidelines on assessing daylight and sunlight*

should be applied sensitively to higher density development in London, particularly in central and urban settings, recognising the London Plan's strategic approach to optimise housing output (Policy 3.4) and the need to accommodate additional housing supply in locations with good accessibility suitable for higher density development (Policy 3.3). Quantitative standards on daylight and sunlight should not be applied rigidly, without carefully considering the location and context and standards experienced in broadly comparable housing typologies in London."

8.104 In a similar vein, the National Planning Policy Framework (2019) at paragraph 123 (c) states *"local planning authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies in this Framework. In this context, when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards)"*.

8.105 This application is accompanied by a Daylight and Sunlight Report prepared by Point 2 Surveyors. This technical assessment uses the methods set out in the Building Research Establishment's (BRE) "Site layout planning for daylight and sunlight: A guide to good practice" to determine the daylight and sunlight amenity within neighbouring properties. It must always be recognised that the document provides guidance and is not mandatory and is not an instrument of planning policy. It should also be recognised that the guidance is applied to all types of development in all contexts, ranging from small-scale countryside developments to high-density urban developments such as the subject of this application. It is clear within the guidance that the standards within it should be applied flexibly with respect to the development's context.

8.106 The Report considers the effects of the proposed development upon the daylight and sunlight amenity of the following surrounding residential properties:

- 28 Gaywood Road
- 30 Gaywood Road
- 35 Gaywood Road
- 37 Gaywood Road
- 39-57 (odd) Gaywood Road
- Aston Grange, 484-512 Forest Road
- 456 & 456A Forest Road
- 569-577a Forest Road
- 579-589 (odd) Forest Road

- 17, 19 & 21 Hawthorne Road
- 18, 20 & 22 Hawthorne Road

8.107 In total, thirty properties comprising 166 windows, serving 81 habitable rooms were assessed. The properties assessed were selected due to their proximity and orientation to the Site. A detailed analysis of the daylight and sunlight impacts to each of the properties is included within the Daylight and Sunlight Report, which includes a map identifying which properties were assessed.

Daylight

8.108 Vertical Sky Component (VSC) is the most common measure of daylight to neighbouring windows. VSC is a measure of the direct skylight reaching a point from an overcast sky. It is the ratio of the illuminance at a point on a given vertical plane to the illuminance at a point on a horizontal plane due to an unobstructed sky. The BRE guidelines state that if the VSC at the centre of a window is less than 27%, and it is less than 0.8 times its former value (i.e. the proportional reduction is greater than 20%), then the reduction in skylight will be noticeable, and the existing building may be adversely affected.

8.109 Sixteen of the assessed properties are fully BRE compliant and would not be subject to any noticeable reductions in VSC. The remaining 14 properties experience some transgressions of which 6 are very minor at less than 30%. These are 39, 41, 43, 45, 57 Gaywood Road and 456 Forest Road. The remaining 8 have some windows which experience VSC reductions greater than 30%, these are 47, 49, 51, 53 & 55 Gaywood Road, 569-577A Forest Road, 21 Hawthorne Road and 30 Gaywood Road.

8.110 Appendix F of the BRE guidelines provides advice on setting alternative targets for access to daylight and sunlight. In relation to the default targets it says; "*These values are purely advisory and different targets may be used.....for example, in a mews in a historic city centre, a typical obstruction angle might be close to 40 degrees. This would correspond to a VSC of 18%, which could be used as a target.*"

8.111 In many urban areas development angles of 40 degrees, or more, are common and a VSC of 18% has been a reasonable and accepted level of daylight in many desirable urban areas for well over a century.

8.112 Where transgressions are present, noting the alternate target values appropriate for an urban environment of 18%, retained VSCs rarely fall below this level, indeed this scenario only occurs within 5 properties: 55 Gaywood Road, 456 Forest Road, 569-557a Forest Road, 21 Hawthorne Road and 30 Gaywood Road. With regards to 55 Gaywood Road, 21 Hawthorne Road and 30 Gaywood Road, these sub 18% retained VSC values are mitigated due to the impacted windows being secondary windows. Thus they are not the primary light giving windows for the rooms they serve. 456 Forest Road experiences a retained VSC of 14.81%, which is only a minor transgression from the alternate target value set not least as the transgression is only minor at 26.5%.

8.113 Overall, the development provides daylight levels which meet or exceed the target levels appropriate for an urban environment, and it is considered that neighbours' daylight levels will be retained at level that is commensurate with expectations for an urban location such as this.

Sunlight

8.114 The standard measure for the level of sunlight reaching a residential window is the Annual Probable Sunlight Hours (APSH), which is a measure of sunlight that a given window may expect over a year period. The BRE recommends that the APSH received at a given window should be at least 25% of the total available, including at least 5% during the winter.

8.115 Where the proposed values fall short of these, and the absolute loss is greater than 4%, then the proposed values should not be less than 0.8 times their previous value in each period (i.e. the proportional reductions should not be greater than 20%).

8.116 Of the windows assessed, only 3 transgress from the BRE guidelines with APSH levels of less than 25%. These transgressions are directly attributable to the design of the affected buildings (such as side returns) which reduce access to sunlight; this is evidenced by the existing APSH levels for all 3 rooms which currently do not meet the 25% criterion set by the BRE. It is considered that development does little to adversely impact the sunlight to these properties and on balance sunlight levels across the assessed area remain sufficient.

8.117 The development demonstrates good compliance with the BRE Guidance for Daylight and Sunlight assessment; where transgressions are present, they are generally minor and certainly in-keeping with the urban environment.

Internal daylight and sunlight

8.118 The proposal has been carefully designed to ensure that the dwellings receive sufficient amounts of sunlight and daylight, and the number of dual aspect homes across the development has been maximised where possible.

8.119 In terms of sunlight, the emphasis of the BRE guidance is on living rooms rather than bedrooms and kitchens. The guide recommends that "*Sensitive layout design of flats will attempt to ensure that each individual dwelling has at least one main living room which can receive a reasonable amount of sunlight ..*"

8.120 An Internal Daylight and Sunlight Report prepared by Point 2 is submitted with the planning application. This provides an assessment of all proposed habitable rooms facing Forest Road, as well as all rooms at ground and first floor levels which will overlook neighbouring properties.

8.121 Internal daylight levels are assessed using Average Daylight Factor (ADF). This method considers the transmittance of the glazing to the room in question (i.e. how much light gets through the window glass); the net glazed area of the window in question; the total

area of the room surfaces (ceiling, walls, floor and windows) and their reflectances; and the angle of visible sky reaching the window/windows in question.

8.122 Every north facing room at ground or first floor level within the development has been assessed. In addition, every habitable room at ground or first floor which will overlook neighbouring properties has been assessed. In total 54 rooms were assessed: 27 Living/Kitchen/Dining rooms (LKDs) and 27 bedrooms. The internal daylight analysis results attached at Appendix 2 confirm that each of the 54 habitable rooms tested across the proposed development will achieve the recommended ADF targets for their relevant room uses, indeed many of the rooms far exceed their target values representing high daylight levels across the development areas tested.

8.123 12 rooms which will be orientated to within 90 degrees of due south were assessed for sunlight receipt. Each room achieves between 27% to 80% Annual Probable Sunlight Hours (APSH), against a target of 25% and between 5% to 24% Winter APSH against a target of 5%. Each of the rooms exceed the APSH requirements.

Overlooking

8.124 The proposed building has been designed to ensure that the potential for overlooking to neighbouring residential properties is minimised. The new residential windows facing onto Gaywood, Forest and Hawthorne Roads are all located on the opposite side of the street to the nearest neighbouring properties, and this relationship is considered acceptable.

8.125 To the rear of the Site new residential windows will allow some overlooking to the rear of the gardens of properties on both Gaywood and Hawthorne Roads. The gardens affected are already overlooked by windows from existing adjoining properties within both Gaywood and Hawthorne Roads and it is not considered that the proposed development will demonstrably increase the sense of overlooking for residents.

8.126 A roof terrace is proposed at third floor level fronting Gaywood Road. The edge of the terrace is set back from the building's front façade to create additional separation distance to the adjacent properties. Given that any views will be to the front of the Gaywood Road properties, it is not considered to have an adverse impact on the neighbouring residents' amenity. A second roof terrace is proposed at fourth floor level fronting Forest Road. This largely looks away from neighbouring residents and will not affect privacy.

Transport and Refuse

Transport Impact

8.127 Core Strategy Policy CS7 (Developing Sustainable Transport) seeks to ensure that development proposals fully assess the impact on transport capacity and should not adversely affect the transport network.

8.128 A Transport Assessment (TA) prepared by Transport Planning Practice (TPP) accompanies this planning application. The TA provides a full review of the impact of the

proposals on the local highway and public transport networks. A manual PTAL assessment identifies the Site as being located in an area with a PTAL rating of 4, indicating a good level of public transport accessibility.

- 8.129 The TA details that the site is less than 15-minute walking distance to numerous services including a doctor's surgery, retail and convenience stores and Primary and Secondary Schools. The location, together with the low level of proposed parking means that nearly all the trips to and from the Site will be by sustainable modes of travel. As a result, nearly all of the trips to and from the Site will be by sustainable modes of travel.
- 8.130 The TA also concludes that the uplift in public transport usage will be comfortably accommodated within the current transport services. The resulting net decrease in vehicle trips associated with the proposed development is also considered to be a benefit to the local transport network. The increase in cycle trips arising from the development will make use of the enhanced cycle infrastructure around the site and across the Borough
- 8.131 A Draft Travel Plan prepared by TPP is submitted with the planning application. The aim of the Travel Plan is to encourage future residents to travel to and from the site using sustainable modes. The Pocket model is car-free to encourage the use of sustainable modes of transport. As the proposed development will only provide two accessible car parking spaces, the travel patterns have already been influenced towards the use of sustainable transport. Therefore, the main objective of the Travel Plan is to maintain the predicted travel patterns to and from the development. A package of measures including the provision of a Travel Information Pack for new residents, on site cycle parking and LBWF's cycle training are identified within the Travel Plan.

Car Parking

- 8.132 Development Management Policy DM16 states that the Council will seek to effectively manage parking and ensure the provision of safe and attractive parking facilities by *"(B) where a car-free and car-capped development is implemented, limiting on-site car parking for these developments to spaces designed for disabled people and operational and service needs and introducing controlled parking zones in the vicinity of the development; occupants of car free developments will not be issued with on-street parking permits"*
- 8.133 The Draft London Plan Policy T6.1 states that for residential development *"must, as a minimum, ensure that for three per cent of dwellings, at least one designated disabled persons parking bay is available from the outset"*.
- 8.134 The development is mostly car-free recognising its public transport accessibility and low parking demand expected from the development which provides one bedroom Pocket apartments. Owners of Pocket homes are typically young professionals and first time buyers who travel to work by sustainable transport and do not tend to have the desire or need to own a private vehicle. This has been confirmed by a survey of Pocket buyers' travel patterns which show that they are very sustainable with a car driver mode share of approximately 3%. It is expected that residents (except blue badge holders) at the

development will not be eligible to apply for CPZ parking permits to park on the surrounding roads.

8.135 Two accessible car parking spaces will be located on the eastern side of the site with access from Hawthorne Road. If there is more demand for parking by blue badge holders at the development, it is expected that these residents will park on-street along Gaywood Road or Hawthorne Road. This would provide 4 accessible car parking spaces for 8 accessible homes (50% provision).

8.136 A Transport Assessment prepared by TPP is submitted with this planning application. This outlines the results of parking beat surveys of the local area. All parking bays surveyed are within Controlled Parking Zones and can only be used by permit holders. The parking survey indicates that the demand on Hawthorne Road is high which results in a minimum of 3 spare parking spaces throughout the day. However, the demand on Gaywood Road is proportionally lower and there are more spare parking spaces (minimum of 17).

8.137 Were there future demand for 2 additional accessible 'blue badge' spaces on Gaywood Road, the parking survey results indicate that these could be accommodated without causing additional parking stress locally.

Cycle Parking

8.138 The cycle standards outlined in Policy 7.2 of the Draft London Plan recommend a minimum of 1 space per one bedroom, one person dwelling.

8.139 Cycle parking will be provided in accordance with the Draft New London Plan with a long-stay cycle parking provision of 92 spaces within a secure, accessible and weather-proof store. 5% of the spaces would be accessible or flexible use cycle spaces suitable for non-standard cycles, in accordance with the London Cycle Design Standards.

8.140 In accordance with the London Plan requirements, 4 residential visitor cycle parking spaces (1 per 40 units) are proposed within the building's entrance lobby.

8.141 This meets the London Plan requirements and is likely to encourage sustainable modes of travel, in accordance with emerging Development Management Policy DM16.

Waste and Servicing

8.142 Policy DM32 requires that refuse storage should be stored in areas which benefit from safe and convenient access for occupants. The location should provide satisfactory access for refuse collection vehicles.

8.143 A Delivery Servicing Management Plan prepared by TPP is submitted with the planning application. The document identifies the likely level of servicing trips, proposed access arrangements for servicing and refuse collection vehicles and measures to minimise the impact of servicing and refuse collection trips on the existing highway.

8.144 A ground floor refuse store is located to the front of the Site accessed from Forest Road. Through discussions with the Council's waste officers it was agreed that capacity for the

waste store should be based on BS 5906:2005, meaning 7no. 1280L (100L x 90no.1B1P units = 9000L) for each of refuse and recycling waste, with 2no. Nexus City 240L food waste recycling bins. Designated space is also provided for disposal of large items within the communal waste store near to its entrance.

- 8.145 Refuse servicing associated with the proposed development will be undertaken from the on-street layby located on Forest Road close to the development's main entrance, and LBWF Officers have confirmed that this approach is acceptable. Full details of a survey of the layby are provided within the TA, and demonstrate there is ample spare capacity throughout a typical day to accommodate the refuse servicing.
- 8.146 The layby is within 10m of the refuse store which allows for easy access. To facilitate the use of the layby for deliveries and refuse collection an amendment to the Traffic Regulation Order governing its use will need to be implemented and a dropped kerb will be provided along the layby.

Construction Management

- 8.147 LBWF Policy DM13 requires proposals to submit a Construction Logistics Plan in order to mitigate the impact of any noise, additional traffic or potential disruption to the network.
- 8.148 A Construction Management Plan produced by Pocket is submitted with this planning application and outlines the proposed measures that will be implemented during construction to ensure there are limited construction impacts on the local highway network and the neighbouring occupiers.
- 8.149 The CMP will act as a 'live' document to be updated as the project progresses, with additional information such as sub-contractor method statements and risk assessments.

Air Quality Assessment

- 8.150 Development Management Policy DM24 states that new developments should not contribute to, nor suffer from unacceptable levels of air pollution. An Air Quality Assessment (AQA) prepared by XCO2 is submitted with the planning application.
- 8.151 The AQA concludes that during the operational phase of the development, combustion of fossil fuels and associated combustion emissions for heating will be reduced via improved levels of insulation and air tightness for the buildings' fabric, and the specification of highly efficient gas boilers (for further details please refer to the accompanying Energy Statement).
- 8.152 Ultra-low NO_x boilers will be specified to further reduce impacts on air quality from the combustion of fuels on site. To protect internal air quality, 'healthy' materials will be specified for the buildings' fabric and internal finishes, where feasible; these will be non-toxic, and low emitters of VOCs and formaldehyde.

8.153 Overall, the development will meet 'air quality neutral' benchmarks set out in the London Plan. For further details please refer to the Air Quality Assessment submitted in support of the application.

Acoustic Assessment

8.154 The development will incorporate design and building fabric measures to mitigate potential noise levels from the proposed development, and ensure the impact of any external sources on internal ambient noise levels are within acceptable limits.

8.155 An Environmental Noise Assessment has been undertaken by XCO2 to evaluate the suitability of the site for its intended residential use. The results from the assessment demonstrate that to achieve acceptable noise levels inside the proposed flats, glazing with an enhanced performance is required to windows closest to and overlooking Forest Road to the north of the site along with acoustic ventilators. External noise levels from Forest Road are such that the bedrooms and living spaces overlooking Forest Road may benefit from mechanical ventilation with acoustic attenuation, and these have been incorporated into the detailed design.

Flood Assessment and Drainage Strategy

8.156 In accordance with LBWF's Validation Checklist, as the Site is in Flood Zone 1, less than a hectare in size and is unaffected by any other sources of flooding, a full Flood Risk Assessment is not required.

8.157 A Drainage Strategy prepared by Whitby Wood is submitted with the planning application. To satisfy the requirements of LBWF, Thames Water, the London Plan and other relevant design guidance, it is proposed to restrict surface water discharge from the Site to the Greenfield Runoff Rates.

8.158 A proposed surface water drainage network has been designed to adhere to the discharge restrictions, whilst utilising sustainable drainage techniques to manage surface water and provide the required attenuation. The network is designed to accommodate a 1 in 100 year storm event without flooding, whilst also providing an allowance for a 40% increase in rainfall intensity from climate change.

Energy and Sustainability

8.159 An Energy Statement and a Sustainability Statement prepared by XCO2 is submitted as part of the planning application. In accordance with the Council's policies DM10 and DM11 and those within the London Plan and Draft London Plan, the proposal incorporates an energy strategy for the proposed development that has been formulated following the London Plan Energy Hierarchy: Be Lean, Be Clean and Be Green.

8.160 The methodology employed to determine the potential CO2 savings for this development is in accordance with the three step Energy Hierarchy outlined in the London Plan and Waltham Forest Core Strategy Policy CS4 (Be Lean, Be Clean and Be Green). In line with

the new GLA Guidance the carbon emission reduction has been calculated and reported using the current SAP2012 and future SAP10 carbon factors. The proposed development is expected to reduce on-site regulated carbon emissions by 20.3% with SAP 2012 emission factors, and by 35.3% with SAP 2010 emission factors.

- 8.161 The first step in the Energy Hierarchy addresses reduction in energy demand, through the adoption of passive and active design measures. The proposed energy efficiency measures include enhanced building fabric with low u-values, improved air permeability rates, daylight maximisation through carefully designed glazing areas as well as energy saving controls for space conditioning and lighting.
- 8.162 The second step takes into account the efficient supply of energy, by prioritising decentralised energy generation. The London Heat Map indicates that although there are no existing district heating networks (DHN) in the vicinity, potential DHN are planned for the area. For future-proofing, the development will be served by site-wide heat network with a dedicated energy. In this way, the development will be able to distribute heat efficiently and be prepared for a connection to a possible future district heating network, if feasible prior to construction.
- 8.163 The third and final step focuses on the renewable technologies to be incorporated into the development. A feasibility study has been carried out for the development to identify opportunities for renewable technology incorporation, looking into the technical feasibility as well as the expected energy and carbon emissions savings. An on-site single Energy Centre will produce low carbon heating and hot water for all dwellings. Air source heat pumps and photovoltaic solar panels have been identified as suitable technologies. The air source heat pumps will be used in combination with gas boilers in a hybrid centralised solution to ensure optimal efficient heat generation for the development. Given that the proposed development is a 100% affordable housing development, careful consideration has been given to the financial impact of the energy strategy on future residents' energy costs.
- 8.164 With the SAP10 carbon factors, to achieve 'zero carbon', 39.7 tonnes per annum of regulated CO₂, equivalent to 1,191 tonnes over 30 years should be offset off-site. With the SAP2012 carbon factors, to achieve 'zero carbon', 55.9 tonnes per annum of regulated CO₂, equivalent to 1,675.8 tonnes over 30 years should be offset off-site.
- 8.165 The Energy Statement demonstrates that the proposed development has been designed to meet energy policies set by the London Plan and LBWF.

Ecology

- 8.166 An Ecological Appraisal prepared by XCO2 is submitted with the planning application. The document identifies that any trees, shrubs or areas of habitat removed during the construction process will be replaced by species or habitats of equal or greater ecological value where possible, via communal amenity spaces at ground and roof terrace level.

8.167 Though the potential of finding bats onsite is low, there is still a chance for bats to use the site temporarily in the future. It is recommended that the development includes integrated bird bricks or bird boxes to provide nesting habitat for local birds, and these can be secured via a planning condition.

8.168 The proposals comply with LBWF policy DM35 which requires that, where opportunities arise, development proposals must provide measures to support species and habitats through the use of landscaping features.

Fire Strategy

8.169 A Fire Strategy Report prepared by JGA accompanies the submission. The report outlines the fire strategy for the development in collaboration with fire safety inspectors and will form the basis for submission to Building Control.

Secure by Design

8.170 The design team has met the Metropolitan Police's Designing Out Crime Officers on two separate occasions. Firstly when the development was in its early design stages in March 2019, and later pre-application submission in December 2019. A number of improvements to the security of the front lobby, and the defensible space on Forest Road have been made in response to comments and further details are included within the Design and Access Statement.

Ground Contamination

8.171 Development Management Policy DM24 states that when development is proposed on or near a site that is known to be contaminated or that there is good reason to believe may be contaminated, the Applicant should carry out a site assessment. A report of the findings should be submitted to the Council in order to establish the nature and extent of the contamination.

8.172 A Phase 1 Environmental Study prepared by RSK is submitted with the planning application. The investigation identifies moderate risks for both construction works and future site users. As a result, it is recommended that a site investigation is completed and this will be carried out by the Applicant prior to commencement. Mitigation measures, informed by site investigations would be defined in a future Remediation Strategy and contractor's method statements to ensure appropriate design and construction during the development. As is usual for an application site of this nature, it is anticipated that any further site investigation and remediation will be secured by planning condition.

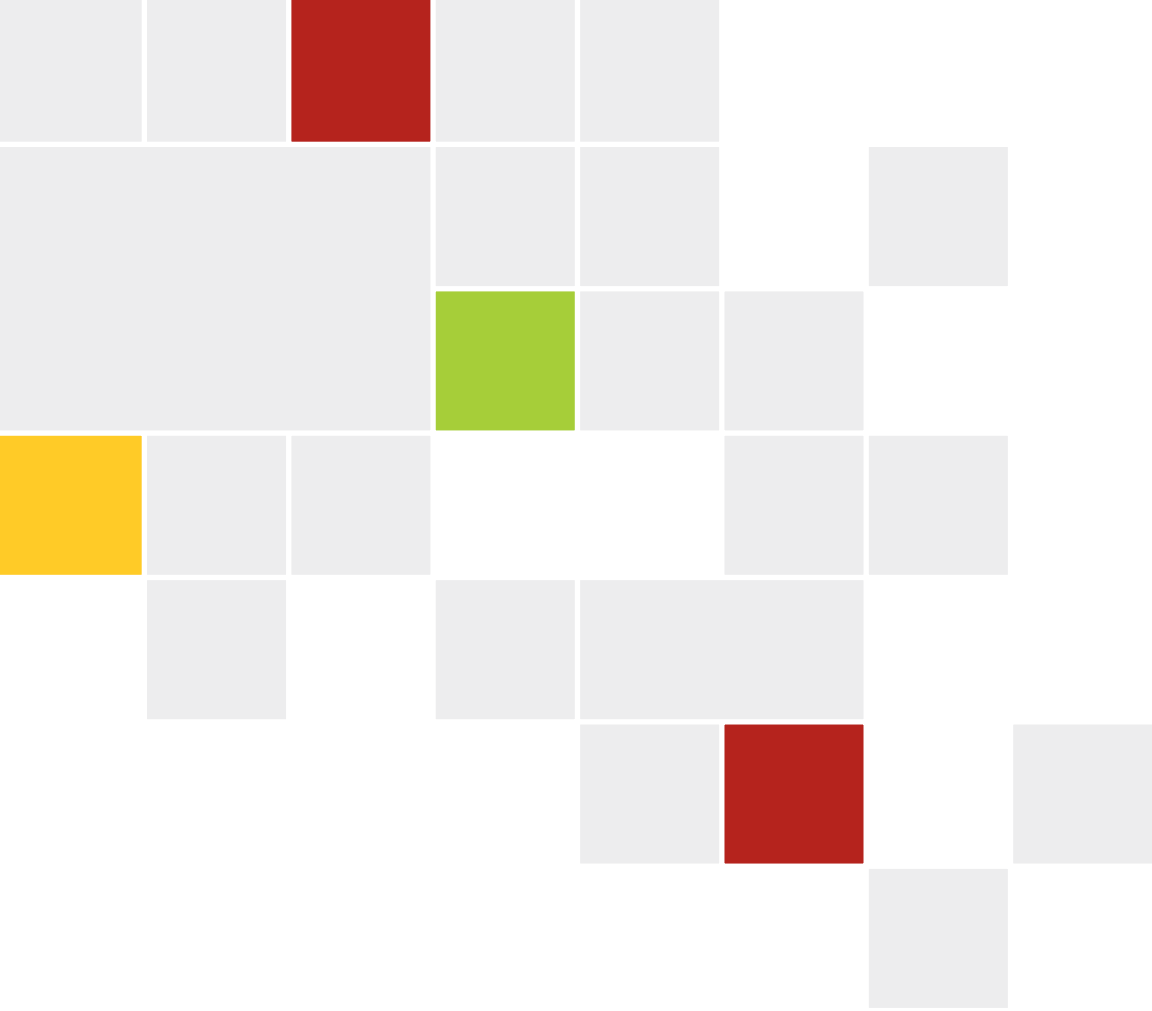
9. Conclusion

- 9.1 The development will make a positive contribution to the local area, providing 100% affordable housing which is high quality in its design and build, and is supported by the Mayor of London. The new homes are for young professionals who currently live or work in the Borough of Waltham Forest and currently do not own their own home.
- 9.2 The proposed development will help meet the urgent need for affordable homes in the Borough and will therefore meet the requirements of the Council's strategic planning policies which identify the provision of new affordable homes as a priority land use. The development will be of exceptional design quality and will provide secure cycle parking, landscaping, residential amenity space.
- 9.3 The Council's Strategic Housing Market Assessment (SHMA) has identified a substantial shortfall in the provision of affordable tenures of residential accommodation. The assessment identified a requirement to deliver 1,258 affordable housing units, which represents 69% of the overall Objectively Assessed Need (OAN) for the Borough.
- 9.4 The SHMA identifies that 61% of the net future annual affordable housing need is for housing at intermediate tenures. The proposal would target this identified housing need with affordable housing for those people living and working in the Borough who have middle and modest income households who are priced out of home ownership.
- 9.5 The SHMA also identifies that the evolving characteristics of LBWF as the area continues to attract a growing single and professional population. However, many of these households are forced to rent, or to move out of LBWF to cheaper areas to buy, often removing a younger and dynamic section of the population. The proposal would cater for and satisfy the aspirations of this growing population, which LBWF's Core Strategy identifies as playing a key role in improving the Borough's social fabric.
- 9.6 The Draft New London Plan and Mayor's Viability SPG are clear that, in order to incentivise developments providing over 75% affordable housing, Councils can apply flexibility on issues such as housing mix and tenure. In order to optimise on-site affordable housing Pocket, who are supported by the Mayor, deliver one-bed homes.
- 9.7 Section 38(6) of the Planning & Compulsory Purchase Act (2004), states that the determination of a planning application must be in accordance with the Development Plan, unless material considerations indicate otherwise. This Planning Statement demonstrates that the strength of material considerations, in particular the significant weight that must be apportioned to the affordable housing benefits, overcome any perceived conflicts with local planning policies in terms of the proposed mix and tenure of new homes.
- 9.8 The proposal incorporates high quality design, which has been carefully considered to positively respond to the scale, character and grain of the local area. The design has evolved positively through the consultation process in line with stakeholder feedback. The

proposal takes the opportunity to reinstate a historic building line addressing Gaywood, Forest and Hawthorne Roads. This completes the urban block; an improvement from the existing building which is set back from Forest and Gaywood Roads, breaking the street frontage.

- 9.9 The proposed building presents a four storey front to Forest Road with a set back fifth storey adorned with a gently scalloped parapet. The set back fifth storey massing is consistent with nearby residential buildings to the east of the Site, which also front this main Walthamstow artery. Where the proposed building meets the neighbouring terraced housing on Gaywood and Hawthorne Roads, its scale successfully reduces to create a comfortable relationship with the domestic scale buildings.
- 9.10 Overall, the proposal optimises the Site's potential for affordable housing whilst delivering exemplar design with a variety of high quality external amenity spaces for residents. Each of the new homes will provide excellent residential amenity, with high levels of natural light. With the exception of two accessible off-street car parking spaces, the development is car-free to encourage sustainable development modes of transport.
- 9.11 The proposed development is a sustainable form of development in line with the NPPF. It addresses the three dimensions to sustainable development referred to in paragraph 8 of the National Planning Policy Framework:
- Economic: it would contribute to building a strong, responsive and competitive economy, by ensuring that the Site is developed in a manner that supports growth;
 - Social: it would support strong, vibrant and healthy communities, by contributing significantly to the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment and providing desperately needed affordable housing;
 - Environmental: it would protect and enhance the natural, built and historic environment, improve biodiversity, minimise waste and pollution and mitigate climate change.
- 9.12 The application is supported by a suite of technical documents and reports that demonstrate that the planning proposal would comply with the Council's detailed Development Management policies, as well as the strategic objectives of the Council's Core Strategy, and those within the London Plan, which all acknowledge the imperative to provide new homes.
- 9.13 The proposal will bring much needed homes for LBWF residents and workers on modest incomes. There is strong interest locally in low cost ownership initiatives: there are 2,391 applicants on the Share to Buy Register from LBWF, and 652 eligible applicants on Pocket's own register. Pocket's previous development within the Borough at Gainsford Road, which consisted of 100% one-bed homes, proved very popular. All homes were sold before the construction of the building was completed, and this demonstrates that there is high demand for Pocket homes within the local area

- 9.14 At a local level, only 11% of owned or shared ownership homes in the William Morris ward (where the Site is located) are one-bedroom homes. Across LBWF as a whole the shortage of one-bedroom home ownership is even more acute, with only 8% of owned and shared ownership homes comprising one-bedroom homes. The proposed development will help meet a clearly evidenced demand for one-bedroom affordable homes.
- 9.15 There are significant material considerations, notably the substantial benefits of providing 90no. new affordable residential dwellings, which overcome any perceived conflict with local planning policies. The proposal is consistent with the broad objectives of the NPPF, the London Plan and the Council's Development Plan and planning permission should be granted.



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