Former Walthamstow Stadium site

3 June 2011

Applicant: L&Q

PLANNING AND REGENERATION STATEMENT

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1.0 INTRODUCTION

Description of Development

1.1.1 This planning and regeneration statement is submitted on behalf of L&Q in support of a detailed planning application and a listed building application being made to the London Borough of Waltham Forest (LBWF) for the redevelopment of the former Walthamstow Stadium.

1.1.2 The proposed development comprises the demolition of existing (unlisted) buildings, conversion, alterations and extensions to the retained listed buildings (comprising the Tote board and the dog kennels) for leisure and community uses, residential accommodation (comprising a total of 301 dwellings for a mix of private and affordable housing), open space provision (public, private and communal), car, motorcycle and cycle parking and access through the existing Chingford Road entrance. The residential accommodation includes a mix of unit sizes, including a significant number of family houses, and the height of the proposed new buildings will range between 2 and 8 storeys.

Development Objectives

1.2.1 The overall objective is to provide a sustainable, residential-led development that will assist the Council in meeting its future housing requirements. Through imaginative design the site provides a good example of where housing intensification can be successfully achieved. L&Q’s aspiration is to deliver:

- A high quality and liveable environment which adheres to best practice standards for room and unit sizes and which addresses Lifetime Homes and adaptability criteria.
- High levels of environmental performance and reduced carbon emissions.
- The creation of a secure environment that minimises opportunities for crime and anti-social behaviour.

1.2.2 L&Q fully acknowledge the importance of the listed buildings on the site and the ‘iconic’ presence that they have in the local area. The redevelopment proposal allows for the long term retention of the listed buildings on the site and seeks to ensure that they have viable future uses which are of direct benefit to local communities. L&Q have sought to evoke memories of the greyhound stadium within the layout of the new development and the proposed arrangement of linear residential streets reflects both the surrounding urban grain as well as the strong axial relationship between the listed Totes and the typography of the long grandstands.

1.2.3 The site will be ‘opened-up’ to local communities through the provision of new sports, leisure and community uses, public open space, play facilities, and pocket allotments. The proposal will also enhance access into and across the site via new
pedestrian and cycle connections and a new riverside walk adjacent to the de-culverted River Ching.

**Pre-Application Consultation**

1.3.1 The applications are submitted following a series of pre-application discussions with senior officers at LBWF and the Greater London Authority (GLA) and in light of extensive consultation with the key statutory and non-statutory consultees including English Heritage, Transport for London (TfL), the Commission for Architecture and the Built Environment (CABE) and the Environment Agency (EA). The scheme that is submitted has been amended significantly to reflect the detailed observations that have been made.

1.3.2 At the same time, L&Q have sought to engage with a wide range of local communities and interest groups throughout the design process with the aspiration of ensuring that the plans represent the best future for the site and for the community at large. The process has included focus groups, meetings with local organisations, door knocking discussions, telephone surveys, public consultation events, one to one meetings with local residents as well as meetings with students, local businesses, special interest groups and resident associations.

1.3.3 The consultation approach has been drawn up with regard to national guidance set out in PPS1, the guidelines set out in the Government’s emerging Localism Bill and the requirements of the LBWF Statement of Community Involvement. Full details of the approach to stakeholder and community consultation are provided in the Statement of Community Engagement that accompanies this application.

**Scope of Supporting Information**

1.4.1 Having regard to the London Borough of Waltham Forest Local Validation Requirements (April 2008), and to reflect the specific issues raised by this proposal, the planning and listed building applications are accompanied by the following supporting documents:

- Design and Access Statement (incorporating Building for Life Assessment)
- Heritage Assessment
- PPS5 Heritage Statement
- Planning and Regeneration Statement (this document)
- Statement of Community Engagement
- Transport Impact Assessment
- Travel Plan
- Daylight Report
- Arboricultural Report
- Landscape, Biodiversity and Open Space Strategy
- Preliminary Contamination Assessment
Purpose of the Planning Statement

1.5.1 This Planning and Regeneration Statement outlines how the proposed development has been considered in the context of national, strategic and local policy objectives and in response to the requirements of the local planning authority, the GLA and other statutory consultees. The statement incorporates the potential heads of terms of a future legal agreement to be signed under the provisions of Section 106 of the Town and Country Planning Act 1990.

1.5.2 Section 2 of the statement provides a summary of the key characteristics of the site and the surrounding area. Section 3 outlines the relevant planning history relating to the site. Section 4 provides a summary of the adopted and emerging policies against which these applications fall to be considered. Section 5 provides a detailed summary of the development proposal and Section 6 considers the proposal in the context of the relevant planning policies. Section 7 draws our conclusions.
2.0 SITE CONTEXT

2.0.1 Full details on the site context are provided in the Design and Access Statement accompanying this application and also within the Urban Design Guidance for Walthamstow Stadium (Urban Practitioners/London Borough of Waltham Forest, July 2007). The following analysis provides a summary of the key characteristics of the site and the surrounding area having particular regard to the planning issues explored in further detail in section 6 of this statement.

2.1 Site Location and Accessibility

2.1.1 The subject site is situated at 300 Chingford Road, London, E4 8SJ and lies approximately 2km to the north of Walthamstow town centre and its associated facilities and public transport interchange. The site is positioned immediately to the north of the Crooked Billet Roundabout which provides access to the A406 North Circular Road (running east to west) and Chingford Road (running north to south).

2.1.2 As well as having excellent access by road (both on the local and strategic highway network), the site is served by a good network of bus services. As outlined in the Transport Statement accompanying the application, eight daytime bus services are accessible within a five minute walk of the site, with seven of these passing the site on Chingford Road and the eighth being accessible from the Crooked Billet Roundabout. The nearest bus stops are situated along the site frontage on Chingford Road and the route into Walthamstow town centre takes approximately 10 minutes during off-peak hours.

2.1.3 The nearest mainline rail services are at Highams Park Station located approximately 1.2 km to the north-east of the site. The nearest underground station is Walthamstow Central which is approximately 2km to the south or which can be accessed two stops down the line from Highams Park Station.

2.1.4 Taking the train and bus services into account, the development site has a public transport accessibility level (PTAL) of 3, which represents an average level of accessibility.

2.1.5 The site is situated adjacent to a designated cycle route which runs along the Chingford Road and which crosses the Crooked Billet Roundabout using a subway and bridges. On-street cycle lanes along Chingford Road provide access to Walthamstow town centre to the south. An off-road cycle path runs along the southern boundary of the site and provides a connection to Highams Park Station.

2.1.6 Pedestrian connectivity in the area is currently restricted by the heavily trafficked routes of Chingford Road and the North Circular as well as by the presence of the large development sites in the area, including the subject site...
itself. There is currently no pedestrian access across the site, although there is an existing pedestrian and cycle route footpath which provides a link from Empress Avenue, along the southern boundary of the application site, and towards Highams Park.

### 2.2 Character and Identity of the Local Area

#### Urban Grain and Land Use

2.2.1 The area surrounding the application site contains a number of different land uses and a variety of buildings types.

2.2.2 Immediately to the north and south of the site are a series of residential streets which comprise two storey terraced dwellings, arranged in a conventional block structure, with a consistent building line to the street frontages and modest sized rear gardens. The properties on the south side of Rushcroft Road and the north side of Empress Avenue have gardens which back directly onto the application site. The existing grandstands within the site are positioned close to the rear boundaries of a number of adjoining residential properties. There are no parking controls on these residential streets, although we understand that when the greyhound stadium was operational a controlled parking zone (CPZ) was in place.

2.2.3 A number of other land uses have large footprints and serve to impede local connectivity. To the west of the site, on the opposite side of Chingford Road, is a large Sainsbury’s retail store with associated car parking and petrol filling station to the frontage. Also within this site is a four storey Holiday Inn hotel.

2.2.4 To the east of the site lies the Rush Croft Sport’s College (secondary school level) which is accessed via Rushcroft Road to the north and which presents a blank boundary to the site. To the south east of the site are the playing fields of the Hale End Sport’s Ground.

2.2.5 The former greyhound stadium car park, which is located adjacent to the Sainsbury’s store on the west side of Chingford Road, was disposed of separately from the greyhound stadium and does not form part of the application site. As outlined in section 3 of this statement, a planning application for the redevelopment of this site is under consideration by the local planning authority at the time of writing this statement.

#### Open Space and Amenity Provision

2.2.6 As shown on the plans contained within the Design and Access Statement, there is a significant quantity of green space around the site, although little of this is accessible to the public. The use of many of these spaces as school pitches and private sports grounds leaves limited space available for informal recreation. There is a small pocket of informal amenity space adjacent to the south east corner of the site, while
at a wider level the large expanses of green space in Lea Valley and Epping Forest are accessible by cycle or public transport.

2.2.7 As outlined in the Council’s Urban Design Guidance for the site, the nearest designated park is Kitchener Road Park, located to the south of the North Circular and within a 400 metre catchment from the edge of the application site. It is, however, noted that pedestrian access across the North Circular makes the distance considerably greater. Further details on local play and amenity space provision are provided in the Sporting and Leisure Statement accompanying this planning application. This statement indicates that, aside from Kitchener Park, the most accessible parks and playgrounds to the site are located at The Long Leys Estate, Keatley Green and Arnett Square (each being within a 1km radius of the site). In respect of outdoor sport’s facilities, the Peter May Sports Centre (formerly known as Wadham Lodge Sports Centre) is located a short distance to the east and, together with Hale End Sports Ground and Parmitters and Cavendish Sports Ground, they provide readily accessible sports facilities.

2.2.8 The River Ching provides an important ecological corridor, running east to west and linking the Lea Valley with Epping Forest. The River currently runs in a culvert as it crosses the application site.

Local Facilities and Services

2.2.9 Aside from the Sainsbury’s store referred to above, a Morrison’s retail supermarket is situated approximately 750m north of the site and adjoining this is a Bannatyne’s Health Club which provides a swimming pool, gyms and aerobic studios. Access to a wider range of amenities, services and shopping is available just over 1km to the north at Chingford Mount Road, a neighbourhood centre. Other shops and services are available approximately 500m from the site in a small parade to the south of the Crooked Billet Roundabout. Walthamstow Town Centre, approximately 2km to the south of the site, provides a wider range of convenience and comparison retail facilities.

2.3 The Character and Identity of the Application Site

The Historic Development of the Site

2.3.1 The subject site has been used for sporting or recreational activities for some 90 years, including athletics, football and, most recently and most famously, for greyhound racing. The greyhound track was opened by the Chandler family in 1933 and the site stayed in the family’s interest for 75 years. The historical sequence of development of the stadium and its associated grandstands, kennels and Tote boards is outlined in the Heritage Statement and the Design and Access Statement accompanying the application. The majority of the significant building works took place in the mid to late 1930’s and the grandstands were subsequently modified, altered and extended over time. The car park to the west of Chingford Road was developed in the early 1950s and
provided additional parking for approximately 400 cars. An upgrade of the Tote Building and West Stand, together with a new main entrance to the north side, took place in 1969, while in 1984 the northern section of the West Stand was extended to incorporate ‘Charlie Chan’s’ nightclub.

2.3.2 Following a request to spot-list the buildings at the Stadium, the kennels (built 1933) and attached secondary Tote board (1935), the main Tote board (1935), the west spectator stand (1936) and the two-storey car park (1936) were identified as having special interest. As a consequence these structures were included on the Government’s Statutory List of Buildings of Special Architectural or Historic Interest in the Grade II category, on 23 May 2007. A further request to spot-list the spectator stands was dismissed in 2010.

2.3.3 When fully operational, the Stadium held five greyhound race meetings a week, on Tuesday, Thursday and Saturday evenings and on Monday and Friday afternoons. The Stadium had a capacity for approximately 5,000 people. Car parking associated with the Stadium was primarily provided in a separate car park on the opposite side of Chingford Road. From the mid 1980’s the site also saw activity through the nightclub use.

2.3.4 Walthamstow Stadium closed on 16 August 2008 and the site was subsequently sold to L&Q (the applicant). The site has been vacant since this time whilst redevelopment proposals have progressed.

Site Characteristics

2.3.5 The subject site has it main frontage to Chingford Road and is dominated by the iconic Tote building which is visible from the North Circular and which provides one of the most prominent frontages in the Borough. This frontage building, with its famous neon lighting to the road aspect, and the Tote board facing into the site, are listed Grade II. The Tote building is the equivalent of between five and six residential storeys in height.

2.3.6 Attached to the base of the Tote building are a number of lower structures which comprise a two storey car park (one floor being enclosed and the other forming an open deck), the West spectator stand and a number of modern and unsympathetic extensions. There is an important green space adjacent to Chingford Road which sits at the base of the frontage range and which falls outside of L&Q’s ownership.

2.3.7 At the opposite end of the greyhound track are the listed dog kennels. The kennels are positioned adjacent to the eastern curve of the track and are single storey in height (with the two end pavilions rising to the equivalent of two storeys).

2.3.8 The greyhound track is itself raised and to a certain extent this limits the extent of visibility between the two listed structures at either end of the track.
2.3.9 Large spectator grandstands are positioned adjacent to both the north and south ‘straights’ of the greyhound track. These are the equivalent of two to five residential storeys in height. The stands are positioned very close to the northern and southern boundaries of the site such that they present an unrelieved facade directly to the rear of many adjoining properties in Rushcroft Road and Empress Avenue.

2.3.10 The stadium site has three vehicular access points. The main access is located at the northern end of the Chingford Road frontage. In addition, there is an access at the southern end of the Chingford Road frontage and an access into the site at the eastern end of Rushcroft Road. There are two further, but inactive, access points along Rushcroft Road.

2.3.11 There is little existing vegetation on the site, with the exception of some boundary tree planting and the green space in the centre of the racetrack itself. This central space has been under-used by virtue of its enclosure by the race track. Having regard to the location of the grandstands and the culverting of the River Ching, there is currently a blank boundary onto the Ching Corridor pedestrian and cycle route which runs to the south of the site.

2.4 Site Opportunities and Constraints

2.4.1 Taking into account the site characteristics outlined above, L&Q has identified a number of design principles to guide the redevelopment proposal. These principles have been drawn up to reflect the guidance set out in the Urban Design Guidance for the site and include the following:

1. To preserve public views of the listed Toteboard.
2. To use the existing entrance route from Chingford Road.
3. To retain and convert the listed buildings and to find viable uses for them.
4. To respect the grain of the adjoining terraced properties and to provide visual relief adjacent to the site boundaries wherever possible.
5. To retain an open space in the centre of the site which is inspired by the existing racetrack, albeit reduced in size.
6. To retain inter-visibility between the two listed buildings in the east and west of the site.
7. To enhance pedestrian connectivity both in a north to south and an east to west orientation.
8. To create an active frontage to the River Ching Corridor and the adjoining open space.
9. To better incorporate the River Ching into the site and to consider opportunities for de-culverting the river.
10. To consider opportunities for taller buildings where appropriate in terms of residential amenity and the setting of the listed buildings.
11. To maximise the provision of new green spaces within the site and to enhance connections to adjoining green spaces.
3.0 PLANNING HISTORY

3.1 Planning History Prior to L&Q’s Ownership of the Site

3.1.1 A summary of the development of the Greyhound Stadium from the 1930’s through to the present day is set out in detail in the Heritage Assessment accompanying these applications. The site’s recent planning history (as taken from the Council’s on-line register) is outlined in the schedule attached at Appendix 1 of this Statement and is summarised below.

3.2 Planning History Subsequent to L&Q’s Ownership of the Site

3.2.1 Walthamstow Stadium closed on 16 August 2008 and the site was subsequently sold to L&Q. At the point of acquisition, L&Q entered into a relationship with a commercial partner. This partner was responsible for consulting on and submitting proposals in relation to the redevelopment of the site.

3.2.2 Although a planning application was never submitted, a series of pre-application meetings took place with both the local planning authority and the GLA, which led to a public exhibition of the proposals being held in January 2010. An application for an Environmental Impact Assessment (EIA) screening opinion was also submitted to the Council in respect of a proposal for ‘Demolition of existing (unlisted) buildings, retention and conversion of (Tote board) building for use for commercial and residential purposes, retention of listed dog Kennels to the rear of site and redevelopment of remainder of site to provide: (1)Private and affordable housing (530 single family and residential flats comprising a mix of 1, 2, 3 and 4 bedroom units. (2)1200sqm of commercial floorspace provision of car, motorcycle, cycle store and car club’ (LPA Ref: 2008/1627/EIA). It was concluded that the proposals did not require the submission of an Environmental Assessment.

3.2.3 L&Q assumed sole responsibility for the redevelopment of the site in early 2010, since which time it has engaged in detailed pre-application discussions with local communities, the local planning authority, the GLA and other statutory consultees. The planning application to which this statement relates represents the culmination of these discussions.

3.2.4 Through a formal screening process with the local authority it has again been established that the development (cited in the application as comprising approximately 300 residential units and commercial floorspace) would not constitute an EIA development as defined within the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999 and Circular 02/99: Environmental Impact Assessment (LPA Ref: 2010/1195/EIA Regula).

3.3 The Listing of the Existing Buildings

3.3.1 On 23 May 2007 the entrance range comprising the Tote board, the west spectator stand and car park, and the kennels were listed Grade II. A copy of the listing
descriptions, which do not extend to the other spectator stands, are included in the Heritage Assessment accompanying this application.

3.3.2 In September 2010 a request was made to English Heritage by a third party to consider spot-listing the spectator stands at the Stadium. Following consideration of the information put forward, English Heritage determined that the spectator stands were not of special interest in terms of technological innovation and due to the extent of their alterations. The request was dismissed.

3.4 The Planning History Relating to Adjoining Sites

3.4.1 As noted at paragraph 2.2.5 of this statement, the former greyhound stadium car park, located on the opposite side of Chingford Road, was disposed of separately from the greyhound stadium. Under its current ownership, this land is therefore no longer available for use in connection with the redevelopment of the site. Planning applications for the car park site are currently under consideration by the local planning authority and comprise the following:

- **2011/0275** Erection of vehicle showroom, retail parts distribution centre, vehicle workshops and valet servicing/MOT facilities with associated landscaping, new access from Walthamstow Avenue and closure of access opposite Empress Avenue (Registered 10 March 2011).

- **2011/0278** Use of rear half of site for Coach/Bus depot for 64 buses/coaches and 38 mini buses with associated, plant storage facility, ancillary office and associated landscaping and formation of access from Walthamstow Avenue Roundabout (Registered 11 March 2011).
4.0 PLANNING POLICY FRAMEWORK

4.1 National Planning Policy

4.1.1 At the national level, Government advice is set out in Planning Policy Guidance Notes (PPG’s), Planning Policy Statements (PPS’s) and good practice documents. The relevant documents as they relate to the proposal for Walthamstow Stadium are listed below.

- Planning Policy Statement 1: Delivering Sustainable Development, 2004
- Planning Policy Statement 3: Housing, 2006
- Planning Policy Statement 5: Planning for the Historic Environment, 2010
- Planning Policy Statement 12: Local Development Frameworks, 2004
- Planning Policy Guidance 17, Planning for Open Space, Sports and Recreation, 2002
- Planning Policy Statement 23: Planning and Pollution Control, 2004
- Planning Policy Guidance Note 24: Noise, 1994
- Planning Policy Statement 25: Flood Risk, 2010

4.2 The Development Plan

4.2.1 The Development Plan comprises the London Plan 2008 and the LBWF Unitary Development Plan (UDP (2006).

4.3 Strategic Planning Policy

4.3.1 The adopted Strategic Plan in the context of proposals for Walthamstow Stadium is the London Plan (The Spatial Development Strategy for Greater London). The document was consolidated with alterations in 2008.

4.3.2 In October 2009 the Mayor consulted on the draft replacement London Plan: ‘Shaping London’. Two minor alterations to the draft document were published in December 2009 and March 2010.

4.3.3 The draft replacement Plan was subject to an Examination in Public (EiP) which closed in the autumn of 2010 and the Inspector’s Report was published on 3 May 2011. The formal publication of the replacement London Plan is expected in late 2011 and the weight to be attached to the Draft Plan will increase as it nears adoption.

4.3.4 The London Plan is supported by a range of Supplementary Planning Guidance (SPG) and Best Practice Guidance (BPG). Documents of potential relevance include:

- Supplementary Planning Guidance: Accessible London: Achieving an Inclusive Environment, April 2004
4.4 Local Planning Policy

4.4.1 The LBWF Unitary Development Plan (UDP) was adopted in March 2006. The Secretary of State has since issued a Direction saving a number of policies contained in the UDP. For development control purposes only those policies that have been specified as part of this Direction now form part of the UDP. Policies relating to housing provision and quantity, affordable housing and residential density have now expired.

4.4.2 The UDP Proposals Map contains no land use allocations relating to the site, although the southern edge of the site is designated as a Green Corridor and is located within an Archaeological Priority Zone. The site also falls within Flood Zone 3 on the Environment Agency’s Flood Risk Maps. An extract from the UDP Proposals Map and the accompanying key are attached at Appendix 2.

4.4.3 LBWF are currently preparing their Local Development Framework (LDF), which will in due course replace the UDP. “Our Place in London” - the Sustainable Community Strategy for Waltham Forest (2008) sets out the foundations on which the LDF and associated Core Strategy will be based. The key aims of the Strategy are to improve housing quality and choice, provide more jobs, tackle deprivation, respond to climate change, promote social inclusivity, create wealth through access to jobs and training, improve the design and quality of public spaces and improve community safety.

4.4.4 In January 2011, the Council published for consultation its Draft Core Strategy. At the same time, the Council issued its Development Management Policies Document (DMPD) which supports the Core Strategy and sets out the Council’s detailed policies for managing development in the Borough. Both documents will, in due course, be subject to an Independent Examination prior to formal adoption. The weight to be attached to these documents will increase as they get closer to adoption.

4.4.5 Having regard to Walthamstow Stadium, Policy CS1 of the emerging Core Strategy encourages high quality development at ‘Key Sites’ including Walthamstow Dogs Stadium, Chingford Municipal Offices and underused land at Whipps Cross Hospital for appropriate uses that will benefit the wider community including housing, employment, leisure and community uses. Policy CS2 further states that the delivery of new homes will be focused in Waltham Forest’s key growth areas of Walthamstow Town Centre, Blackhorse Lane, the Northern Olympic Fringe, Wood
Street and other ‘Key Sites’ in the Borough to meet or exceed a housing target of 10,320 new homes over the plan period.

4.4.6 The evidence base for the preparation of the emerging Core Strategy includes the following documents:

- Waltham Forest Sustainable Community Strategy, 2008-2011
- Waltham Forest Housing Strategy and Action Plan, 2008
- Waltham Forest Affordable Housing Viability Study, 2009
- Waltham Forest High Density Housing Study, 2009
- Waltham Forest Housing Needs Market Assessment, 2007
- Waltham Forest Housing Land Availability Assessment, 2008
- Waltham Forest Housing Strategy, 2008-2028

4.4.7 Other relevant guidance produced by the LBWF includes a Supplementary Planning Document (SPD) on Section 106 Planning Obligations (adopted November 2008) and an ‘Urban Design’ SPD adopted in February 2010. Emerging policy guidance includes the Consultation Draft of the Council’s SPD on ‘Access and Inclusive Design’ (November 2010) and the Consultation Draft of the Council’s Open Space Strategy (November 2009).

4.4.8 In July 2009 the Council published site specific Urban Design Guidance relating to Walthamstow Greyhound Stadium. This document does not form part of the Local Development Framework and has not been adopted by the Council. This document supersedes Informal Planning Guidance for Walthamstow Stadium as published in September 2005.

4.4.9 In summary, the Urban Design Guidance outlines the following opportunities for the future redevelopment of the site so as to maintain its unique sense of place:

1. Preserve views of the Tote board
2. Maintain the main entrance route as the principal access point
3. Retain and convert listed building
4. Provide close urban blocks
5. Create a racetrack inspired open space
6. Retain inter-visibility between the listed buildings
7. Create a new north to south route
8. Provide an active frontage to the pathway and open space
9. Introduce the River Ching into the site
10. Consider opportunities for taller buildings
11. Connect public green spaces to the site
12. Review the retention and extension of the dog kennels
13. Provide secondary links through the site and central space
4.5 **Relevant Planning Policies**

4.5.1 **Appendix 3** provides a list of the adopted Development Plan policies against which the proposal falls to be considered as well as those emerging policies that might also be taken into account. This list is classified according to the planning and design related matters outlined in section 6 of this statement.
5.0 DEVELOPMENT PROPOSAL

5.1.1 The development proposal has been influenced by the comments and guidance received during the consultation process and has been subject to a long period of evolution and refinement. The text provided at Appendix 4 demonstrate how the scheme has evolved since August 2010 to reflect the many discussions held with the local authority, the GLA, statutory consultees and local communities.

5.1.2 The resulting scheme comprises the:

Demolition of all existing unlisted buildings, demolition of the south-west spectator stand, selected demolition to the Popular Entrance, conversion, alterations and extensions to the listed Tote building for leisure use and conversion and alterations to the listed dog kennels for community allotment use. New build residential accommodation (comprising 301 dwellings for a mix of private and affordable housing - including 1, 2, 3 and 4 bed units), new buildings for use as a children’s nursery, café and crèche, open space provision (public, private and communal), car, motorcycle and bicycle parking and vehicular access through the existing Chingford Road entrance.

5.1.3 L&Q’s aspiration is to deliver an iconic redevelopment scheme which incorporates high quality architecture and which will enhance the character and identity of the local area. The key components of the proposed development are as follows:

1. The demolition of the existing buildings and structures on the site (with the exception of the listed entrance range and the listed kennels).

2. The provision of new viable uses for the retained listed buildings and their enhancement to better reveal their significance as heritage assets (by removing historical incremental additions and alterations).

   - At the front of the site the main Tote building will provide a community focus for the scheme. The building will be restored and sensitively extended to provide a multi-functional community sports centre for various activities (exercise classes, combat sports, table tennis, children’s gymnastics, ballroom dancing etc) together with juice bar. To the front of the Tote a new landscaped plaza is intended to promote community interaction and to enhance the setting of the listed building. Also fronting onto the new plaza will be a new children’s nursery, café and crèche.

   - In the eastern section of the site the existing dog kennels are to be adapted as stores/potting sheds in connection with the use of new pocket allotments.

3. A new urban form arranged as four rows of linear residential streets (three longer rows and a shorter row to the south), two riverside apartment blocks
adjacent to the southern boundary and a smaller row of mews-style properties in the north east corner of the site. The new streets are designed to reflect the typology of the long spectator stands as well as the surrounding urban grain of terraced and semi-detached houses. Taking into account the positioning of the existing grandstands the proposals will, in most instances, significantly increase the separation distances to the neighbouring residential properties. Building heights in the northern block and the two central blocks will range from between two and five storeys in height (rising towards the centre of the site). Within the southern block, building heights will be three storeys in height where adjacent to existing residential properties, rising to seven and eight storeys in the south east corner of the site where there is considered to be an opportunity for a new landmark building.

4. A variety of new open spaces to provide an enhanced and accessible setting for the listed buildings and to open up the site to the wider community. The spaces include a ‘plaza’ in front of the main Tote, an elevated communal garden (emulating the raised race track) and a natural open space connecting to the existing ‘wilderness’ beyond the kennels to the east. At the same time it is proposed that the River Ching be de-culverted to improve the green route for the wider public.

5. References to the memories of the racetrack are reinforced through the design of the built form and the landscaping. The housing typology reflects the form of the long grandstands, a large open space in the centre of the scheme gives a sense of scale of the racetrack, the internal road layout reflects the straight sections of the track while the curvature of the proposed buildings, a curved ‘legacy line’ outside of the Tote and a curved path near the Kennels further records the track’s location.

6. The provision of 301 new homes (105 affordable and 196 private for sale). The percentage of provision that is affordable accommodation is 40% when expressed in terms of habitable rooms.

7. A density of development which equates to 329 habitable rooms per hectare.

8. The provision of a high quality living environment with generous room and unit sizes and with private outdoor space for all dwellings in the form of balconies, terraces and ground floor patio areas overlooking the communal gardens. The buildings are to be of a high quality and contemporary design and will complement one another in their use of materials and styling. All of the new housing is to be designed to Lifetime Homes Standards, 10% of which will be wheelchair accessible or easily adaptable for residents who are wheelchair users. Room and unit sizes are drawn up to reflect current standards.

9. A balanced mix of housing provision. Of the affordable units, approximately 50% are to be made available as affordable dwellings for rent and 50% are to be provided as intermediate housing in the form of shared ownership.
accommodation or other intermediate tenures identified in the London Plan. Significantly more than 50% of the new affordable rented accommodation will be in the form of family accommodation which has been identified as representing the greatest need in the Borough.

10. The retention of the main access route from Chingford Road as the principal entrance. At the same time, enhanced connectivity is to be provided across the site for pedestrians and cyclists enhancing links to adjoining green spaces and facilities.

11. The provision of 274 car parking spaces. To provide a balance between animating the street scene and maximising the space available for landscaping, a range of parking solutions are proposed including on-street parking on private roads within the site, undercroft parking (under the raised landscape amenity space) and parking within and adjacent to the Tote building.

12. The provision of a combined heat and power (CHP) to promote energy efficiency and low carbon usage in the new development.

5.1.4 Section 6 of this statement provides a more in-depth analysis of the scheme proposal in the context of the Development Plan policies and other emerging policy considerations.
6.0 PLANNING CONSIDERATIONS

A. LAND USE CONSIDERATIONS

Regeneration Context

6.1.1 Strategy Policy 17 of the Council’s UDP supports proposals which contribute to the regeneration of those areas of the Borough where investment is required. Core Strategy Policy SO1 further promotes the need ‘to capitalise on redevelopment opportunities to secure physical, economic and environmental regeneration of the borough and ensure the delivery of key benefits for local people.’ In meeting these objectives, L&Q is seeking to deliver a £50 million regeneration scheme that will offer the following benefits for local people:

- To allow for the long term retention of the listed buildings on the site and to put them into a viable use.
- To promote community regeneration through the introduction of a number of land uses of direct benefit to existing and prospective residents.
- To increase the supply of high quality and well designed housing in the Borough.
- To create mixed and balanced communities through the provision of appropriate levels of affordable, intermediate and private accommodation.
- To facilitate the provision of family accommodation, particularly within the affordable rented tenure.
- To deliver an attractive living environment that will enhance the character of the Borough and which adheres to modern design and building standards.
- To enhance the provision of amenity and open space and improve access to adjoining open spaces.
- To provide investment in the Borough through the creation of job opportunities for local residents by way of construction work and training.

6.1.2 The redevelopment of Walthamstow Stadium will enhance the design and quality of public spaces and new buildings in the Borough and will assist the Council in meeting its strategic housing objectives. These strategic objectives are outlined in the Council’s Sustainable Community Strategy, the first listed priority being to ‘improve housing quality and choice with the right kind of homes in the right places’. The Strategy states that housing is a critical element in creating and maintaining sustainable communities, and in meeting the needs of the Borough’s residents. It notes that ‘Our key challenges are how to deliver more affordable housing and increase housing density while retaining the borough’s character, making better use of our existing housing stock, and developing the partnership arrangements to support new developments’ (page 7).

6.1.3 The proposed redevelopment of Walthamstow Stadium comprises 301 new homes, including a mix of private, affordable rented and intermediate affordable accommodation. This will assist the Council in meeting a significant
proportion of its annual housing requirement and the site is considered to be a good example of where housing intensification can be successfully achieved. The need for housing provision in Waltham Forest, including a specific need for housing on the application site, is identified in both adopted and emerging planning policy documents.

6.1.4 At the strategic level, Policy 3A.1 of the London Plan (Increasing London’s Supply of Housing) sets out the Mayor’s strategic housing targets and Policy 3A.2 (Borough Housing Targets) provides the specific requirements for Waltham Forest. Policy 3.3 of the Draft Replacement Plan (Increasing Housing Supply) updates the requirement for Waltham Forest to a total of 7,600 new homes over a 10 year period (2011-2021). At the local level, Policy HSG5 of the UDP seeks to maximise the amount of housing in the Borough through the efficient use of land, while Policy CS2 of the Council’s Core Strategy sets out a housing target of 10,320 new homes over the 15 year plan period.

6.1.5 Although not specifically allocated as a housing site, the Council’s emerging policies note the important role that the application site can provide in meeting wider housing objectives. Policy CS1 of the Core Strategy encourages ‘high quality development at ‘Key Sites’ for appropriate uses that will benefit the wider community including housing, employment, leisure and community uses.’ Walthamstow Stadium is identified as such a ‘Key Site’. Policy CS2 of the Core Strategy provides more specific guidance in respect of facilitating sustainable housing growth. It seeks to focus the delivery of new homes in Waltham Forest’s key growth areas of Walthamstow Town Centre, Blackhorse Lane, the Northern Olympic Fringe, Wood Street and other key sites in the Borough to meet the housing target. Paragraph 5.4 of the reasoned justification to this policy notes that: ‘Other key sites, such as Walthamstow Stadium, part of Whipps Cross Hospital and Chingford Municipal Offices have the capacity to provide a minimum of 2,500 homes which is approximately 22% of total capacity.’

6.1.6 The redevelopment of the application site therefore forms an important element of the Council’s housing growth delivery plan. This has been reiterated in pre-application discussions with the Borough.

6.1.7 L&Q is well placed to assist in meeting the Borough’s wider housing and regeneration objectives both on this site and through other developments in the area. L&Q has a history of working to support the development of housing and regeneration in the Borough for over 45 years. L&Q owns approximately 3,500 homes in LBWF and has an investment programme of over £150M in the Borough aimed at creating jobs, homes and community activities.

6.1.8 We are aware that some greyhound racing supporters have expressed an interest in seeing greyhound racing restored to Walthamstow Stadium and that their plans incorporate an element of residential accommodation. However, to deliver a meaningful housing contribution L&Q maintain that the only viable
The Proposed Mix of Uses and Associated Community Benefits

6.1.9 As well as meeting a pressing need for new housing, the proposal will introduce a vibrant mix of community uses into the site. These will complement the residential accommodation, enhance public access for existing residents (on a site where access is currently restricted) and integrate the site into the wider neighbourhood. The overall mix of uses, which have been informed through pre-application discussions with the local community, includes:

- For the main Tote building, a new leisure centre which is to be opened up as a multi-functional community sports centre offering a range of activities for local people of all ages. The sports centre will be set up as a Community Sports Trust to be run by the community for the community.
- A children’s nursery, located adjacent to the site entrance, with the capacity to provide approximately 60 to 80 child care places for local people.
- A public plaza for the use of all local people to provide a place to play, sit, meet and hold community events. A café and crèche will also be provided within the plaza.
- For the listed kennels, new allotments for use by local communities together with associated equipment stores and community room.
- New play areas, public squares and greens spaces for the use of local people of all ages.
- Improvements and extensions to existing pedestrian and cycle routes and enhanced public access to ensure that the new facilities are accessible to wider communities.
- An extended green corridor adjacent to the River Ching.
- A new combined heat and power unit which could provide energy more widely.

6.1.10 At a strategic policy level, the overall mix of uses would accord with the objectives of London Plan Policy 4B.1 (Design Principles for a Compact City) which states that developments should provide for or enhance a mix of uses where appropriate. The mix also addresses the requirements of Policy 2A.9 (The Suburbs) which sets out the Mayor’s aspirations to support the continued improvement of services which enhance the quality of life in London’s suburbs such as health centres, hospitals, care centres, schools and nurseries and community facilities. Moreover, the proposal would respond positively to the objectives of Policy 7.1 of the Draft Replacement London Plan which seeks to build London’s neighbourhoods and communities and requires that the mix of uses in new developments should improve people’s access to community infrastructure (including green spaces). The provision of a new multi-
purpose sports centre and outdoor play spaces also addresses the requirements of Policy 3.20 of the Draft Replacement Plan to increase active participation in sports and recreational activities.

6.1.11 Having regard to the Council’s regeneration objectives, Policy HSG4 of the UDP seeks to ensure that new housing schemes are not only well-designed, but that they make a contribution to promoting urban renaissance and quality of life. Whilst Walthamstow Stadium is not allocated on the UDP Proposals Map, Policy HSG4 notes that ‘Major Opportunity Sites’ (as this site might have been defined if not operational at the time the UDP was adopted) provide significant mixed use opportunities.

6.1.12 The emerging Core Strategy provides more specific guidance relating to mixed use development and to the land use aspirations for Walthamstow Stadium. The Urban Design Guidance for Walthamstow Stadium also promotes ‘a mix of functions within the site, including community uses to draw people in.’ Policy CS4 of the Core Strategy specifically acknowledges the balance that needs to be struck between promoting new housing growth and providing appropriate infrastructure to support the local community.

6.1.13 It is our contention that the mix of uses proposed on the site address these policy requirements, reflecting not only the acute need for new housing in the Borough, but the aspiration for this to be balanced with complementary community uses and infrastructure in order to create distinctive and liveable communities.

**The Loss of the Former Greyhound Stadium**

6.1.14 The regeneration proposal involves the loss of the former greyhound stadium, the use of which is no longer considered to be viable. L&Q has commissioned research which demonstrates that the greyhound industry is in a long-standing period of decline and that the reinstatement of the former use would not be financially viable (even with a significant amount of enabling development). This information is submitted alongside this planning application.

6.1.15 It is our view that there are no policies that specifically support the retention of the existing greyhound use and that its loss can be justified in the context of both strategic and local planning policies taking into account the merits of the proposed replacement use and potential planning obligations towards enhanced leisure facilities in the local area.

6.1.16 Policy 3A.18 of the London Plan seeks to resist the net loss of facilities defined as having a social infrastructure or community function (this includes primary healthcare facilities, children’s play and recreation facilities, services for young people, older people and disabled people, as well as libraries, sports and leisure facilities, open space, schools, nurseries and other childcare provision, training facilities, fire and policing facilities, community halls, meeting rooms, places of worship, public toilets, facilities for cyclists, convenience shops, banking facilities and
post offices). Policy 3.17 of the Draft Replacement Plan reinforces the objectives of adopted Policy 3A.18. It is our view that the existing use does not fall within the definition of ‘social infrastructure and community facilities’ set out in these policies.

6.1.17 The GLA has previously provided pre-application advice in respect of an earlier redevelopment proposal for Walthamstow Stadium (as referred to at paragraphs 3.2.1 and 3.2.2). This advice states that, given that the site is not designated for a specific use and is in an out-of-centre location, the loss of the existing facility does not raise strategic concerns when considered against the adopted London Plan policies.

6.1.18 Policy 3.20 of the Draft Replacement London Plan, which is entitled ‘Sports Facilities’ states that ‘proposals that result in a net loss of sports and recreation facilities, including playing fields should be resisted.’ Whilst no definition of a sports or recreational facility is provided in the policy, we note that the strategic objective of the policy is ‘to increase participation in and tackle inequality of access to sport and physical activity in London particularly amongst groups/areas with low levels of participation.’ Having regard to these objectives, we consider the policy to be of less relevance in respect of the existing use, which is spectator rather than activity based. We further note that greyhound racing is not defined as one of the ‘recognised sports’ listed by Sport England.

6.1.19 Policy 3.20 of the London Plan further notes that ‘Wherever possible, multi-use public facilities for sport and recreational activity should be encouraged.’ The proposal directly addresses this policy objective through the provision of a new community-based sports centre within the main Tote building.

6.1.20 Policy 4.6 of the draft London Plan seeks to support and enhance the provision for arts, culture and entertainment. Whilst the definition of ‘arts, culture and entertainment’ uses might arguably include the former use of the site of the greyhound stadium, these is no specific clause in Policy 4.6 restricting the loss of any such defined facility.

6.1.21 Having regard to the local planning context, we note that whilst the Council has a broad policy assumption to retain leisure sites in certain locations, the former greyhound stadium is not specifically allocated on the UDP Proposals Map. Furthermore, the loss of the former greyhound stadium is not precluded within the Council’s Urban Design Guidance for the site, although it is noted that reference is made within this document to the possibility of retaining the racetrack either on its own or as part of a mixed use development.

6.1.22 Policy TRL16 of the UDP states that the Council will encourage appropriate arts, culture and entertainment activities either on its own or as part of a mixed use development within Walthamstow town centre and the District Centres. The policy does not seek to resist the loss of such sites. Furthermore, by falling outside of a designated Town or District Centre it is likely that the previous use would not have been supported on this site under current planning policies by virtue of its out-of-
centre location. Similarly, Policy 11 of the Core Strategy (Tourism Development and Visitor Attractions) seeks to ‘(E) protect and enhance the quality of tourist development and visitor attractions in the designated town centres’. It does not seek to protect such uses outside of the designated centres.

6.1.23 Development Management Policy 23 (Tourism Development and Visitor Attractions) also states at criterion d) that attractions likely to yield a large number of visitors should be located in Walthamstow town centre. Criterion (h) of this Policy further notes that the loss of tourist and leisure attractions to alternative uses will only be allowed where the need for such use no longer exists, or there are overriding regeneration benefits to their loss. Paragraph 24.12 of the supporting text provides further elaboration and states that ‘Pressure for alternative uses should be resisted unless the Council is satisfied that the existing use is no longer viable.’

6.1.24 Assuming that the use of the site as a greyhound stadium is considered to fall under the remit of a ‘tourist’ or ‘visitor’ attraction or a ‘social or community infrastructure’ use, as defined in the policies cited above, we consider that the following factors lend support to the proposed development:

- The subject site is not specifically allocated for the retention of the existing use in either adopted or emerging policy guidance.
- Emerging Core Strategy policies (as well as the Urban Design Guidance for the site) support the promotion of alternative uses for the site, either with or without the retention of the greyhound stadium.
- The site is located in an out-of-centre location where such uses would generally be resisted.
- The retention of the site as a greyhound stadium is not considered to be deliverable or policy compliant. A response to an alternative proposal put forward by Mr Morton is provided in a separate report accompanying this application.
- As elaborated in further detail in paragraph 6.1.1, the proposal that forms the subject of these applications will bring about overriding regeneration benefits including community/recreation uses, the protection of heritage assets, new housing provision, employment generation and a sustainable, high quality design. Alongside the provision of a new community sports use, the applicant is willing to consider a potential planning contribution towards the improvement of recreation facilities in the vicinity of the site.

B) HOUSING PROVISION

Residential Density

6.2.1 Policy 3A.3 of the London Plan seeks to maximise the potential of sites and for proposals to achieve the maximum intensity of use compatible with local context, the design principles in Policy 4B.1 and with public transport capacity. The policy states that Boroughs should promote densities in line with this policy and adopt the
residential density ranges set out in Table 3A.2 and which are compatible with sustainable residential quality.

6.2.2 As confirmed in pre-application discussions with Transport for London, the site has a Public Transport Accessibility Level (PTAL) of Level 3, out of a range of 1 to 6 where 6 is considered excellent. For ‘suburban’ sites with a PTAL of Level 2 to 3, Table 3A.2 of the London Plan suggests an indicative density range of 150 to 250 habitable rooms per hectare (hrh). For ‘urban’ sites with a PTAL of 2 to 3, densities of 200-450 hrh are proposed. Policy 3.4 of the Draft Replacement Plan (Optimising Housing Potential) maintains these density ranges. In respect of the subject site, both the GLA and the local planning authority have indicated that the site has a ‘suburban’ rather than an ‘urban’ character.

6.2.3 At the local level, the subject site falls under the definition of ‘All Other Areas’ within UDP Policy PSC4, where densities of between 200 and 250 hrh are supported. Emerging policies PSC4 and DM8 reinforce the density standards. The Council’s Urban Design Guidance for Walthamstow Stadium similarly refers to densities of 200 to 250 hrh, but notes that, ‘The Council may consider development at higher densities dependent on the overall quality of design and living accommodation and appreciation of the wider site context.’

6.2.4 Having regard to this policy guidance, the redevelopment proposal for Walthamstow Stadium includes the provision of 301 new residential units. Based on the site area of 3.28 hectares this equates to a density of 92 units per hectare or 329 hrh. Whilst the proposed density therefore falls above the indicative ranges for a site in this location, the planning policies quoted above do provide for circumstances in which densities above the indicative ranges might be considered appropriate subject to site-specific circumstances.

6.2.5 National planning policy acknowledges the role that good urban design can play in accommodating higher density development, paragraph 50 of PPS3 stating that, ‘If done well, imaginative design and layout of new development can lead to a more efficient use of land without compromising the quality of the local environment.’ In line with this advice, Objective 1 of the London Plan seeks to ‘achieve an urban renaissance through higher density and intensification in line with public transport capacity, leading to a high quality, compact city, building upon London’s existing urban quality and sense of place.’

6.2.7 Paragraph 1.3.27 of the GLA’s emerging Housing SPD further states that, ‘where proposals are made for developments above the relevant density range they must be tested rigorously, taking particular account not just of factors covered by Policy 3.4 [of the Draft Replacement Plan] but also other policies which are relevant to exceptionally high density development. These include different aspects of ‘liveability’ related to proposed dwelling mix, design and quality, amenity provision and space, physical access to services, design, car parking and the wider context of the proposal taking account of its contribution to local ‘place shaping’ as well as concerns over ‘place shielding’.
6.2.8 We consider that the proposed density is appropriate for a site of this size and in this location taking into account the proposed design approach and the aspiration to deliver a high quality development. This view has been supported in pre-application discussions with the local planning authority and the GLA. As outlined in the Design and Access Statement accompanying these applications, the objective is to deliver a design and regeneration-led development rather than to put forward a density-driven scheme. In other words, the proposed density need not be at the expense of good design.

6.2.9 The factors outlined below, which are expanded upon in other sections of this Statement, are considered to provide a strong justification for the proposed density of the development:

- Notwithstanding the PTAL level, the site has good access to public transport (particularly by bus) and to other local services.
- The site is identified by the Council in emerging policy as a ‘Key Site’ on which the efficient and optimal use of land is required to help meet the strategic housing targets.
- The overall character of the proposed development is of a suburban form comprising a series of linear streets which reflect the adjoining properties.
- The new residential accommodation is designed to offer an attractive residential environmental both in terms of the quality of the new buildings and public areas and the size of the living spaces to be provided.
- The development incorporates a range of high quality amenity spaces (public, private and communal) which will enhance the quality of the living environment and soften the overall appearance of the buildings. A considerable proportion of the car parking provision is to be provided in an undercroft area to maximise the amount of landscaping within the site.
- Relief is provided to the site boundaries both in terms of separation distances and reduced building heights. Houses with back gardens are situated adjacent to the neighbouring houses to the north and the south such that the density of the scheme on the site boundaries reflects that of adjoining properties.
- The site is of a sufficient scale such that there are opportunities to introduce taller buildings in the least sensitive parts of the site and for the development to form its own character and appearance. Building heights and density therefore increase towards the centre of the development and also within the south east corner of the site where there is an open aspect onto the adjoining playing fields.
- Development of the scale proposed allows for the provision of complementary community and amenity uses, which in turn help to create a liveable community.

**Housing Tenure and Affordable Housing Provision**

6.2.10 L&Q acknowledge the urgent need for new affordable housing to be delivered in the Borough. The intention is to maximise the provision of affordable housing on the
site taking into account the need to provide mixed and balanced communities and the overall viability of the proposed development.

6.2.11 PPS3 sets out the Government’s objectives for the provision of affordable housing and highlights the need to widen housing opportunity and choice. In guiding future development schemes Policy 3A.9 of the London Plan sets out the Mayor’s strategic target that 50% of the housing provision secured from all sources be affordable. Policy 3A.10 further states that when negotiating on individual schemes, Boroughs should seek the maximum reasonable amount of provision, taking into account the need to encourage rather than restrain residential development and the individual circumstances of the site. Targets should be applied flexibly, having regard to individual site costs, the availability of public subsidy and other scheme requirements.

6.2.12 Policy 3.12 of the Draft Replacement Plan removes the reference to a 50% affordable housing requirement and instead seeks to maximise affordable housing provision to provide at least 13,200 more affordable homes per year in London over the Plan period. Policy 3.13 reinforces the objectives of adopted Policy 3A.10 in respect of viability, but further notes that negotiations should take account of individual circumstances including development viability, the availability of public subsidy, the implications of phased development including ‘overage’ provisions and other scheme requirements.

6.2.13 At the local level, Policy HSG6 notes that the Council will negotiate for the maximum reasonable amount of affordable housing in new housing developments and will aim to achieve the Mayor’s overall target of 50% of the total of new housing from all sources. The supporting text states that an indicative target percentage of 40% will be applied to all new developments. Paragraph 5.16 of the reasoned justification indicates that in order to deliver the maximum amount of affordable housing, developments proposing less than 50% will need to demonstrate a viability case.

6.2.14 As outlined in the table below, it is proposed that 40% of the residential accommodation (expressed in terms of habitable rooms) be made available as affordable housing. This meets the requirements set out in the supporting text to UDP Policy HSG6 and equates to the provision of 105 new affordable homes.

Table 6.1: Walthamstow Stadium – Tenure Mix (By Units and Habitable Rooms)

<table>
<thead>
<tr>
<th></th>
<th>No. of Units</th>
<th>% of Units</th>
<th>No. of Habitable Rooms</th>
<th>% of Habitable Rooms</th>
</tr>
</thead>
<tbody>
<tr>
<td>Private</td>
<td>196</td>
<td>65%</td>
<td>643</td>
<td>60%</td>
</tr>
<tr>
<td>Affordable Rent</td>
<td>52</td>
<td>17%</td>
<td>251</td>
<td>24%</td>
</tr>
<tr>
<td>Intermediate</td>
<td>53</td>
<td>18%</td>
<td>173</td>
<td>16%</td>
</tr>
<tr>
<td>Total</td>
<td>301</td>
<td>100%</td>
<td>1067</td>
<td>100%</td>
</tr>
</tbody>
</table>
6.2.15 L&Q acknowledges that the level of provision falls below the wider 50% target outlined in strategic and local policy. However, any greater level of provision is not considered to be viable. A viability appraisal is submitted with the application to demonstrate that the level of affordable housing provision is the maximum that can reasonably be achieved having regard to other development considerations and costs (including any associated planning obligations). This viability assessment is being drawn up in consultation with the local planning authority and their external advisors.

6.2.16 It is noted that the Council’s Preferred Core Strategy Document (January 2010) states at paragraph 5.20 that, ‘Current assessments reveal that only a maximum borough wide target of 20% is considered deliverable, whereas, in the 2007 market peak a 50% target was considered deliverable.’ This might imply that the proposed level of 40% is significantly greater than might be expected from a development scheme in the present economic climate. It is noted that the proposed redevelopment of land at Billet Works in Walthamstow for 562 new residential units put forward 20% affordable housing. Although the scheme was refused at appeal by the Secretary of State, the level of affordable housing was considered reasonable in the current economic climate.

6.2.17 The Council’s emerging policies requires consideration to be given to the ‘dynamic viability model’ which allows for changing market circumstances to be assessed periodically and for any ‘shortfall’ below the 50% to be treated as a deferred contribution. This matter will be considered by the applicant in preparing a draft planning obligation relating to the provision of affordable housing.

A Balanced Mix of Affordable Tenures

6.2.18 It is proposed that a variety of affordable tenures be provided on the site so as to create a mixed and balanced community that addresses a full range of local housing requirements. Of the proposed affordable housing provision, approximately 50% of the units are be made available at ‘affordable rents’, which is expected to include a range of rents set as a percentage of the market rents within the Borough subject to affordability criteria. These rents will range from between 50% and 80%, with family houses offered at the lower end of this range. The remaining 50% of the affordable units will comprise intermediate housing in the form of shared ownership accommodation or other intermediate tenures identified in the London Plan.

6.2.19 Although both Policy 3.12 of the Draft Replacement London Plan and Core Strategy Policy C2 recommend a 60:40 split, a modest divergence from these ratios is proposed having regard to the overall scheme viability and to reflect the greater proportion of family units to be offered within the affordable rented tenure (as discussed in further detail below). Taking into account the provision of family-sized units for affordable rent, the tenure split when expressed in terms of habitable rooms does in fact accord with the 60:40 ratio.
6.2.20 In acknowledging that new affordable housing needs to be provided immediately, it is proposed that the affordable units be brought forward at an early stage in the construction process. The affordable housing will be ‘tenure blind’ to ensure that all homes are indistinguishable from one another.

Housing Mix

6.2.21 As well as offering a mix of housing tenures, the proposal seeks to provide an appropriate range of unit sizes and types to reflect local need and demand.

6.2.22 The Development Plan context is provided through Policy 3A.5 of the London Plan (Housing Choice) which states that Boroughs should take steps to identify the full range of housing needs within their area in terms of the mix of housing sizes and types, taking account of the housing requirements of different groups, such as students, older people, families with children and people willing to share accommodation. Policy 3.8 (Housing Choice) of the Draft Replacement Plan reinforces these objectives.

6.2.23 The London Plan Housing SPG outlines the net London-wide housing requirement over the next 15 years as being for 32% one bedroom units, 38% two/three bedroom units and 30% four bedroom units across all tenures, but notes that these ratios should be considered in preparing more detailed local housing requirement studies rather than in assessing individual sites. For private and intermediate housing provision, the SPG acknowledges that access to housing in terms of size of accommodation is in relation to ability to pay, rather than housing requirements and that this reflects a prominence of one and two bedroom units in these sectors. Policy 1.1c of the GLA Housing Strategy (February 2010) sets out the aspiration that ‘More family-sized homes, particularly affordable homes, will be provided with 42% of social rented and, by 2011, 16% of intermediate homes having three bedrooms or more.’ No targets are set for private housing provision.

6.2.24 At the local level, UDP Policy HSG9 encourages the provision of a range of dwelling sizes and types for both family and non-family households while emerging Core Strategy Policy CS2 seeks a range of home sizes in new developments and states that the priority is for larger homes (three bedrooms or more). Emerging guidance set out in Development Management Policy DM5 offers more specific guidance and seeks all housing developments to provide a range of dwelling sizes and tenures particularly focusing on the provision of family sized units in line with the Council’s preferred housing mix table set out below:

Table 6.2: Preferred Housing Mix (Development Management Policy DM5)

<table>
<thead>
<tr>
<th>No.</th>
<th>1 Bed</th>
<th>2 Bed</th>
<th>3 Bed</th>
<th>4 Bed</th>
</tr>
</thead>
<tbody>
<tr>
<td>Market</td>
<td>10%</td>
<td>40%</td>
<td>40%</td>
<td>10%</td>
</tr>
<tr>
<td>Intermediate</td>
<td>10%</td>
<td>40%</td>
<td>40%</td>
<td>10%</td>
</tr>
<tr>
<td>Social</td>
<td>10%</td>
<td>30%</td>
<td>50%</td>
<td>10%</td>
</tr>
</tbody>
</table>
6.2.25 As outlined in these policies, L&Q recognise that there is a particular local need for family sized accommodation available at affordable rents. The proposal therefore includes a balanced mixture of one, two and three bedroom apartments, together with a significant number of three and four bedroom houses. Each of the houses has its own private garden and the majority are positioned adjacent to the site boundaries to reflect the character of the surrounding houses. The flats all have private external amenity space.

6.2.26 Overall the scheme will provide a mix of 31 one bedroom units (10%), 188 two bedroom units (62%), 46 three bedroom units (15%) and 36 four bedroom units (12%). When expressed in terms of habitable rooms the proportions are 6% one bedroom units, 53% two bedroom units, 21% three bedroom units and 20% four bedroom units. In summary, 41% of the accommodation, when expressed in terms of habitable rooms, takes the form of family houses. The mix is considered by L&Q to be entirely appropriate to the site’s location, the overall viability of the scheme and local demand and supply.

6.2.27 The mix of the proposed accommodation, as expressed by the number of units and the number of habitable rooms for the different housing tenures, is outlined in the tables below:

Table 6.3: Walthamstow Stadium – Proposed Tenure Mix (By Number of Units)

<table>
<thead>
<tr>
<th></th>
<th>1 Bed</th>
<th>2 Bed</th>
<th>3 Bed</th>
<th>4 Bed</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>No.</td>
<td>%</td>
<td>No.</td>
<td>%</td>
<td>No.</td>
<td>%</td>
</tr>
<tr>
<td>Private</td>
<td>26</td>
<td>13%</td>
<td>133</td>
<td>68%</td>
<td>26</td>
</tr>
<tr>
<td>Intermediate</td>
<td>4</td>
<td>8%</td>
<td>40</td>
<td>75%</td>
<td>9</td>
</tr>
<tr>
<td>Affordable Rent</td>
<td>1</td>
<td>2%</td>
<td>15</td>
<td>29%</td>
<td>11</td>
</tr>
<tr>
<td>Total</td>
<td>31</td>
<td>10%</td>
<td>188</td>
<td>62%</td>
<td>46</td>
</tr>
</tbody>
</table>

Table 6.4: Walthamstow Stadium – Proposed Tenure Mix (By Habitable Rooms)

<table>
<thead>
<tr>
<th></th>
<th>1 Bed</th>
<th>2 Bed</th>
<th>3 Bed</th>
<th>4 Bed</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>No.</td>
<td>%</td>
<td>No.</td>
<td>%</td>
<td>No.</td>
<td>%</td>
</tr>
<tr>
<td>Private</td>
<td>52</td>
<td>8%</td>
<td>399</td>
<td>62%</td>
<td>126</td>
</tr>
<tr>
<td>Intermediate</td>
<td>8</td>
<td>5%</td>
<td>120</td>
<td>69%</td>
<td>45</td>
</tr>
<tr>
<td>Affordable Rent</td>
<td>2</td>
<td>1%</td>
<td>45</td>
<td>18%</td>
<td>54</td>
</tr>
<tr>
<td>Total</td>
<td>62</td>
<td>6%</td>
<td>564</td>
<td>53%</td>
<td>225</td>
</tr>
</tbody>
</table>

6.2.28 Having regard to the objective of maximising the provision of affordable family houses (which is held to be the most pressing local need), approximately 69% of the units to be provided at affordable rents are to be made available for family housing –
i.e. having three or more bedrooms. This increases to 81% when expressed in terms of habitable rooms. Within this, approximately two thirds of the family units available at affordable rents will take the form of large four bedroom units. The level of family accommodation available at affordable rents therefore significantly exceeds the guidelines set out in the London Housing Strategy and in the Council’s emerging Core Strategy.

6.2.29 Of the proposed intermediate housing, 17% of the units will comprise family accommodation (or 26% when calculated in terms of habitable rooms). Whilst this falls below the Council’s emerging targets, it exceeds the 16% target set out in the London Housing Strategy. Any shortfall in respect of the Council’s emerging targets is considered to be justified in light of the significant over-provision of family accommodation available at affordable rents.

6.2.30 In respect of the proposed ‘private’ housing, a total of 37 new family units are to be provided. Whilst this falls below the Council’s emerging target in terms of an overall percentage, it is noted that the GLA’s Housing Strategy adopts no unit mix targets for private housing. Paragraph 1.1.2 of the Strategy states that ‘While there is obviously a significant demand for family-sized market homes in the capital, the SHMA [Strategic Housing Market Assessment] found little net requirement for this type of housing across London, although there are bound to be local variations. This low net requirement...arises mainly because much of London’s future household growth will consist of single person households and because so many of London’s existing owner-occupiers and privately rented homes are family sized.’ L&Q considers that its private housing mix, which includes a significant proportion of two bedroom accommodation, reflects the local demand amongst private purchasers and the lack of alternative sites on which this form of housing will be brought forward in the local area. As further noted in paragraphs 6.2.31 to 6.2.33 below, all of the housing is provided with generous room sizes and private external amenity space.

Residential Design Standards

6.2.31 It is L&Q’s intention to deliver a high quality and accessible living environment will that will provide an excellent standard of accommodation and amenity for prospective occupants with generously proportioned internal spaces and rooms, access to a range of amenity spaces and gardens and which is inclusive for all residents.

6.2.32 This objective is supported at the strategic level by Policies 3A.6 and 4B.5 of the London Plan and Policy 3.5 of the Draft Replacement Plan which seek to ensure the highest standards in respect of room and unit sizes, play and informal recreation provision and safety and security. The London Housing Design Guide provides further elaboration on a number of these points and sets minimum spaces standards for dwellings of different sizes. These standards are reiteratated through the Council’s emerging Development Management Policies (DM7 and DM8).

6.2.33 The scheme will adhere to the following principles:
1. To address the minimum space standards set out in the London Housing Design Guide and emerging Development Plan policies (although it is noted that the Panel Report into the Draft Replacement London Plan recommends that the standards be applied as ‘indicative’ rather than ‘minimum’ standards. All but 13 of the units meet the ‘minimum’ unit size requirements (which equates to 4% of the total number of units). The proposals are considered to be justified in light of the following factors:

- Each of the units is designed efficiently so that there is little surplus circulation space and to ensure that they have regular rooms sizes.
- Those units that do fall marginally below the targets do so by only a very minor degree and are to be designated as private rather than affordable housing.
- The large majority of the units are designed to be dual aspect so as to create light and attractive living spaces.
- In addition to the internal space provision, private amenity space is provided for each unit.

2. To meet the requirements of London Plan Policy 3A.5 and UDP Policy HSG6, a total of 29 wheelchair accessible housing units are to be provided and split across a range of tenures and unit sizes. All of the housing is to meet Lifetime Homes Standards.

3. To meet a ‘Very Good’ score (the highest category) as assessed under the CABE ‘Building for Life’ criteria. A pre-application assessment confirms that this can be achieved.

4. To meet other best practice amenity standards as outlined in subsequent sections of this Statement and the accompanying Design and Access Statement including:

- The provision of satisfactory levels of sunlight, daylight, privacy and outlook for occupiers and adjoining properties.
- A generous provision of amenity and play spaces for both new residents and those living in the surrounding area.
- Adequate and well-designed arrangements the storage collection and the disposal of refuse and recycling.
- An appropriate level of safe and secure cycle parking.

C) URBAN DESIGN

Heritage Considerations

6.3.1 In recognising the heritage status of the site, L&Q has sought to progress a redevelopment scheme that allows for the retention of the listed buildings and for the enhancement of their setting. The starting point in assessing the heritage credentials of the scheme has been PPS5 (Planning and the Historic Environment)
which requires a full assessment to be undertaken of the significance of the affected ‘heritage assets’ and the contribution of the redevelopment scheme in maintaining that significance. The planning application is accompanied by a full supporting justification against the provisions of PPS5 and to reflect the pre-application discussions held with English Heritage and other statutory consultees.

6.3.2 The relevant Development Plan policies acknowledge the need for the protection and enhancement of heritage assets to be viewed in a wider regeneration context. London Policy 4B.13 notes that schemes will be supported which make use of historic assets and stimulate environmental, economic and community regeneration. The Council’s Core Strategy Policy CS12 similarly sets out a series of objectives for protecting and enhancing designated ‘Heritage Assets’ which include D) promoting heritage-led regeneration and seeking appropriate beneficial uses and improvements to historic buildings, spaces and areas and E) ensuring improved access to historic assets and improved understanding of the borough’s history. It is within this regeneration context that the proposals have been brought forward.

6.3.3 The key heritage elements of the scheme, which have evolved in the course of pre-application discussions with English Heritage and which respond to the design principles set out in the Council’s Urban Design Guidance for the site, comprise the following:

(i) The demolition of the non-listed buildings on the site. L&Q does not consider that the spectator stands, which are curtilage listed, are worthy of retention in terms of their individual merit, their contribution to the wider stadium complex, or having regard to the long-term viability and retention of the designated heritage assets. With this in mind, it is noted that when all of the buildings at the Stadium were originally assessed for listing in 2007, the stands were specifically excluded and once again, in September 2010 when English Heritage was asked to spot-list the stands the request was dismissed. The stadium complex was designed specifically for greyhound racing and the conversion of the spectator stands for alternative uses is not considered appropriate.

(ii) The retention of the existing listed buildings (the ‘heritage assets’ as defined by PPS5) which comprise the kennels, Tote boards, west spectator stand and parking garage, giving these structures new viable uses and enhancing them to better reveal their significance as heritage assets. L&Q firmly agree that the designated listed buildings are of considerable heritage importance and it has always been the intention to bring forward an imaginative and high quality design that preserves (and enhances) the listed buildings, whilst bringing them back into a viable, long-term and sustainable use. The proposals also seek to enhance the setting of the listed buildings and to open their appreciation to a wider audience than has previously been available. These are key objectives of PPS5.
(iii) The incorporation of sensitive additions and alterations to the retained listed buildings including two single storey and lightweight glazed structures to the main Tote building to facilitate the provision of the community sports centre and to enliven the new public space at the front of the building. These additions are designed to be of a simple, but high quality design so not as to compete with the historic fabric of the listed building.

(iv) The enhancement of the setting of the retained heritage assets as follows:

- Maximising the axial connection between the two listed Tote structures at either end of the site. A large communal garden, positioned between the two central blocks, emphasises the connection between the two groups of listed buildings at either end of the site.
- Ensuring that the built form of linear residential streets and the internal roads reflects the typography of the long grandstands and the racetrack.
- Arranging the layout and heights of the proposed buildings so not as to compete with the existing building silhouette, or its appreciation from surrounding streets and vantage points.
- As outlined in the Council’s Urban Design Guidance, incorporating a ‘racetrack-inspired’ open space within the site, but without adhering to its existing shape or size.
- Proposing a variety of new open spaces to provide an enhanced and accessible setting for the listed buildings. The spaces include a ‘plaza’ to the front of the main Tote and an elevated communal garden which emulates the raised race track.
- Evoking memories of the track layout through the straightened layout of the road, the curvature of the proposed buildings, the location of new tree planting and in the use of landscaping materials.
- Selecting materials for the new build elements which complement the existing and assist in the legibility of the original structures.

(v) The creation of a vibrant mix of uses that will be viable for the listed buildings in the long term.

6.3.4 In light of the issues outlined above, L&Q maintains that the proposals retain a meaningful sense of the stadium and the racetrack and meet the objectives of PPS5 to conserve and enhance the designated heritage assets, to give them a viable use and setting, and to open their appreciation to a wider audience.

**Design Considerations**

6.3.5 The overall design approach is to introduce a crisp, modernist architecture that frames and complements the retained listed buildings (but does not compete with them), is appropriate to the iconic nature of the site and creates an attractive environment in which to live, work and visit.
Full details of the design rationale, together with an assessment of how the scheme has evolved to reflect the pre-application discussions with the local planning authority, the GLA, key stakeholders and local communities are set out in the accompanying Design and Access Statement. Having regard to the redevelopment objectives set out in the Council’s Urban Design Guidance for the site, the key elements of the scheme’s design are as follows:

**Site Layout**

1) To provide a layout which reflects the long grandstands within the site, with the two central sections being separated by a raised communal garden, which is of a generous width and which takes its reference from the raised race track. At the same time, new terraced houses are positioned adjacent to the north and south boundaries of the site to respect the character of the surrounding built form with garden areas maximised as far as possible.

2) To consider opportunities to create a ‘looser’ urban form in the south east corner of the site where there are fewer constraints in respect of adjoining properties. The form and location of the riverside apartments has been reconsidered in light of discussions with CABE and the local planning authority. Although the principle of a denser and taller urban form has been accepted in this location, it has been requested that the buildings be set back further from the de-culverted River Ching and revised to more closely relate to the form of the development elsewhere within the site. In response, the riverside apartments have been linked to mirror the length of the buildings opposite and to form a consolidated linear street adjacent to the river. At the same time, a two storey opening at ground and first floor level affords a visual link to the listed (kennel) Tote and its associated amenity space. A wider gap is created between the main riverside block and a taller ‘landmark’ building in the south east corner of the site, therefore creating a green link between the adjoining playing fields and wilderness area and the new landscaped spaces within the site. The buildings are set back from the de-culverted river as far as possible, to provide relief to the buildings and to maximise the amenity value of the river corridor.

3) To create new vibrant squares and public spaces throughout the site to act as a foil to the new development and to respect the setting of the retained listed buildings.

**Safety and Security**

4) To achieve active frontages to the main streets and the new open/public spaces (including the new footpaths and cycle routes) which assists in promoting natural surveillance and reducing the risk of crime. The scheme seeks to respond positively to the principles of Secure by Design.
**Connectivity**

5) To promote permeability, particularly for pedestrians and cyclists, with links to the existing footpath adjacent to the River Ching, including new pedestrian/cycle-only links to Rush Croft Sports College at the north-east of the site, to Empress Avenue in the south of the site and via the popular entrance from Chingford Road. This will open up routes through the site which do not currently exist and enhance connectivity between the site and the surrounding residential streets as well as improving the wider link between the Lee Valley and Highams Park. To ensure safety and security, buildings adjacent to the new access points will be orientated to provide natural surveillance. The possibility of creating a north to south pedestrian link through the central gardens has been subject to extensive pre-application discussion. Whilst earlier versions of the masterplan included such a route, this idea has ultimately been dismissed. Information from the applicant’s highways consultants identified that there is no existing route across this part of the site, and that there are no obvious desire lines that would warrant such a route (over and above the new routes provided elsewhere across the site).

**Height, Scale and Massing**

6) To ensure that building heights on the site boundaries are sensitive to those of the existing residential properties to the north and south. Building heights in these locations have therefore been designed to range from between two to four storeys in height. Where neighbouring properties currently face towards the large grandstands within the site, the building heights of the new properties along the boundary are designed to be three to four storeys in height. In the north east corner of the site, where there are no existing grandstands, building heights are restricted to two and three storeys as a direct result of pre-application discussions with local residents.

7) To increase building heights in the centre of the site, whilst respecting the setting of the retained listed buildings. The buildings in the central blocks comprise five storeys and are designed to respect the scale of the main Tote building. The scale and mass of the two central linear blocks has been reduced in pre-application discussions through the incorporation of an upper storey break in the blocks. This creates an opportunity to enhance visual permeability across the site. The cores within these central blocks incorporate the use of lightweight materials and glazing so as to further break up the mass of the elevations and to add to the overall sense of rhythm to the street scene.

**Sense of Identity**

8) To incorporate a ‘gateway’ or ‘marker’ building in the far south east corner of the site, which has its own distinct identity, whilst drawing upon
references from the ‘street’ buildings. Following pre-application discussions with the local planning authority and the GLA it was concluded that an eight storey building rather than a ten storey building (as originally conceived) would be a more appropriate height for this ‘suburban’ site, whilst still providing the chance to create a new landmark. Having regards to Policy 4B.9 of the adopted London Plan (and Policy 7.7 of the emerging Plan) it is considered that the site provides an opportunity for the development of a moderately taller building to enhance the character of the area and to act as a catalyst for regeneration. A new eight storey building is therefore proposed in the south east corner of the site. This will be visible from across the adjoining playfields and along the green route from Highams Park and will provide an identity for the new development in a location where it will not compete with the status of the main Tote board or upon the amenity of adjoining residents.

Protection of Existing Heritage Assets and their Setting

9) As outlined above, to respect the heritage assets on the site and to evoke the memory of the grandstands and the racetrack in the built form and landscaping.

Residential Amenity

Existing Residents

6.3.7 While there are no residential neighbours immediately to the east and west of the site, the northern and southern boundaries adjoin the rear gardens of the properties in Rushcroft Road and Empress Avenue respectively.

6.3.8 The overall design approach is for the back gardens of adjoining houses to face onto the back gardens of the new houses located along the northern and southern boundaries of the site. In comparison to the existing grandstands located along these boundaries (which are positioned hard to the site edge and which rise to the equivalent of five storeys in height) the proposal will position development considerably further from the rear of the adjoining properties and will reduce the overall heights of the buildings. For these reasons, and taking into account the detailed design of the proposal, we consider that an acceptable relationship will be achieved.

6.3.9 The Council’s Urban Design SPD amplifies the amenity requirements set out in UDP Policy PCS3. In order to prevent overlooking or loss of privacy, the Guidance encourages the provision of an indicative 20 metre separation distance between two storey properties (increasing by 10 metres per storey). Independently of the minimum separation distances between buildings, it is recommended that new developments with habitable rooms overlooking existing private gardens be set back 5m per storey from the common boundary. At the same time, the Guidance notes that ‘whilst these standards provide a useful starting point, a ‘blanket’
approach to the adoption of these standards can sometimes result in the creation of unattractive residential environments by denying the ability to provide privacy through careful design’ (page 52).

6.3.10 Along the northern boundary, the main grandstand rises from the equivalent of four storeys in height immediately adjacent to the site edge, to five storeys approximately 12 metres from the boundary. It is our view that the existing grandstand currently has a negative impact on the sense of enclosure experienced by residents on the south side of Rushcroft Road.

6.3.11 The new houses along this boundary would rise to a maximum of four storeys in height, but would be pulled back considerably further from site boundary. The separation distance between the rear of the adjoining properties and the new houses would range from 20 to 25 metres. Where the building is four storeys in height, the top floor of the proposed accommodation would be orientated into the application site, and would contain no windows to the rear. Whilst there would be the potential for some overlooking from the windows in the rear of the first and second floors, these rooms are designed to contain bedrooms rather than living accommodation, the window sizes are to be modest and there are opportunities for additional boundary planting. In terms of daylight and sunlight the new development would not break a ‘rule of thumb’ 25 degree line as taken from a ground floor window on the nearest adjoining property. The daylight and sunlight reports accompanying these applications provide further details.

6.3.12 It is acknowledged that the main grandstand does not extend the full length of the northern boundary and that for some residents there will be new houses at the rear of their properties where no development currently exists. Detailed pre-application discussions have been held with individual residents in this regard and the building heights of the six new homes to be positioned where there are no existing grandstands have been reduced in response to the conversations held. The new homes at this location will be two to three storeys in height and they will be positioned approximately 23 metres from the rear elevation of the neighbouring homes. There are no windows in the rear of the third storey element and the proposal will accord with the relevant daylight and sunlight guidelines.

6.3.13 It is proposed that a short terrace of mews-style properties be located adjacent to the new pedestrian and cycle access to Rushcroft Road, in the north east corner of site. These buildings will be two storeys in height and are orientated to face into the application site such that any views towards the rear gardens of the adjoining properties will be oblique. Following pre-application discussions the height of the mews-terrace has been reduced and the pattern of fenestration revised to minimise the potential for overlooking.

6.3.14 In the north west corner of the site, adjacent to the proposed vehicular access from Chingford Road, the new nursery building will be between one and three
storeys. Along its rear elevation, the building contains no windows and is not therefore considered to have any material impact upon residents in Rushcroft Road in terms of overlooking or loss of privacy as compared to existing. Similarly, the two storey element of the nursery building occupies a part of the site currently occupied by the much taller north grandstand. Following in-depth discussions with the local planning authority the upper floors of the nursery building have been pulled away from the boundary by two metres to provide some relief and to allow for new boundary planting.

6.3.15 The three storey element of the nursery building, which again has no windows to the rear, adjoins the rear garden of the property at 1 Fairview Villas (located along Chingford Road). The Council’s Urban Design SPD seeks a minimum 12 metre clearance between the window of a habitable room and the blank flank wall of an opposing two storey building. For three storey buildings the clearance should be a minimum of 18 metres. In this instance the distance involved is approximately 14 metres, although we note that the three storey element has a flat roof and is only marginally taller than the neighbouring property.

6.3.16 Within the south west corner of the site, there is currently a separation distance of approximately 25 metres between the rear of the neighbouring properties in Empress Avenue and the two to three storey south grandstand. The proposed development has been pulled further back from the boundary and the separation distances are generally 35 metres (reducing in certain instances to 30 metres). Although some of the new houses on this boundary rise to four storeys in height, the fourth storey is set back from the rear elevation and the proposed development will not extend above the plane of a line drawn from the ground floor windows of the neighbouring properties to the ridge line of the existing grandstand. Furthermore, there is good planting along the southern boundary which provides a relatively good screen between the neighbouring properties and the application site.

6.3.17 Having regard to the proposed accessed arrangement, the proposal seeks to utilise the existing entrance from Chingford Road and will not allow for vehicular access from either of the residential streets to the north or south. This will serve to minimise noise and disturbance for nearby residents.

Prospective Residents

6.3.18 As outlined in paragraphs 6.2.31 to 6.2.33 of this Statement, the proposal seeks to provide a high quality and inclusive living environment for prospective residents in terms of daylight and sunlight, privacy and amenity space provision.

6.3.19 The daylight and sunlight assessments accompanying these applications demonstrate that a high standard of accommodation can be achieved.

6.3.20 In respect of privacy and overlooking, the boundary conditions have been addressed in the preceding paragraphs of this Statement. For the central blocks, a separation
distance of approximately 28 metres will be achieved and this intervening space will be sensitively landscaped in the form of courtyard gardens and a generous central communal space so as to provide an attractive outlook.

6.3.21 Policy PSC2 of the UDP specifically encourages the provision of secure and usable private amenity open space in all new residential developments. The Council’s Urban Design SPD sets out a guideline for a minimum of 50 square metres (sqm) of private garden space for one and two bedroom dwellings with an additional 10 sqm per bedroom. For flatted developments 10sqm of amenity space (not necessarily private amenity space) is sought per unit.

6.3.22 Within the proposed development each house is designed to have a rear private garden. The majority of the houses adjacent to the northern and southern boundaries also incorporate sizeable roof terraces. Along the northern boundary, and with the exception of four houses (which have private amenity spaces of between 40 and 50 sqm in size), all of the houses have amenity spaces in excess of 50sqm. Along the southern boundary all of the houses have private amenity spaces above 50 sqm in size. The houses in the central blocks have amenity spaces of between 30 and 40 sqm in the form of courtyard gardens together with access to a large and semi-private communal space. The proposed apartments each have their own private amenity space in the form of a balcony or terrace and these are designed to be of a sufficient width to create a useable outside space and, where possible, to take advantage of a southerly orientation.

6.3.23 At the same time, a diverse range of attractive amenity spaces are to be provided across the scheme including both communal and public spaces. The extent of the communal and public spaces equates to approximately 25 sqm per unit and provides a further form of amenity space in addition to the private gardens, courtyards, terraces and balconies. Therefore, although some individual units may fall below the emerging requirements for private amenity space as set out in Development Management Policy DM7, the overall extent, range and usability of the spaces is considered to be acceptable, particularly when taking into account the provision of other communal and public space within the site.

**Landscaping and Open Space**

6.3.24 Policy 3D.8 of the London Plan seeks to promote and improve access to London’s network of open spaces, to realise the current and potential value of open space to communities, and to protect the many benefits of open space, including those associated with health, sport and recreation, children’s play, regeneration, the economy, culture, biodiversity and the environment. Policy 4B.3 encourages proposals that enhance the quality of the public realm. UDP Policy ENV16 encourages, where appropriate, the provision of suitable open spaces in proposals for major new residential developments.

6.3.25 The landscaping and public realm proposals have been developed in tandem with the design of the new buildings to promote security and the active use of the
amenity spaces. Full details are provided in the Open Space and Landscaping Strategy accompanying this application, the key objectives being as set out below;

- To provide generously sized open spaces in the form of public squares, play spaces, green areas adjacent to the de-culverted River Ching, allotments and incidental open space.
- To ensure that the majority of these spaces are accessible to the wider community (as compared to the existing use which provides no unregulated access).
- To enhance links to wider open spaces and to promote the principle of a ‘Green Corridor’ by linking into the strategic green infrastructure network.
- To safeguard and improve the quality, character, access and ecology of the River Ching.
- To provide new pocket allotments on site to address an identified local need.
- To create a green boulevard, with street trees on either side, that provides an attractive entrance to the estate.
- To provide a pedestrian friendly environment.
- To use existing and new trees to reduce the urban scale, filter views and provide a positive impact on the street scene.
- To unify the scheme through the use of a consistent and simple palette of materials, creating a landscape language that links to the architecture of the buildings.
- To provide well overlooked public spaces that maximise exposure, usability and accessibility.
- To ensure the adequate provision and quality of play and recreational spaces, local parks and open spaces.

6.3.26 In responding to the more specific issues raised by statutory consultees during the pre-application process the design of the new landscaping has been revised to take into account the following:

- The public plaza to be created in front of the main Tote building is reduced in size, thereby bringing the active amenities of the nursery, sports centre and café/crèche closer together and providing an opportunity to create a vibrant and well used space. At the same time a greener environment is to be created to soften the character of this area.
- The design of the central garden spaces has been considered in further detail to provide distinct areas for different activities.
- A wider green space is to be created between the apartment blocks adjacent to the Ching Brook, which will enhance the link between the new amenity spaces within the site and the wider open spaces to the east.

6.3.27 Having regard to the existing trees, the arboricultural assessment accompanying this application indicates that there are nine category B trees, ten category C trees and two category R (removal) trees on or adjacent to the site. Most of the trees require minor or standard arboricultural management to improve their current condition and seven trees are identified as being of particular merit and
worthy of retention. The remaining trees are noted as being of little importance
and not placing a constraint on development. The development seeks to retain
all of the important trees on the site and only two trees are shown for removal
due to their poor condition.

**Playspace Provision**

6.3.28 The proposed play strategy for the development site is based on the provisions
of the Mayor’s SPG document entitled ‘Providing for Children and Young People’s Play
and Informal Recreation’ (2008) as well as the Waltham Forest ‘Play Plan 2007–2010’

6.3.29 The Mayor’s SPG sets benchmarks for play space provision across three indicative
age bands (Under 5s, 5 to 11 years, and 12 years +) and sets an indicative standard
for a minimum of 10 sqm provision per child. Policy 3D.13 of the London Plan and
Policy ENV17 of the UDP reinforce the SPG requirements. In meeting the 10 sqm per
child provision, the SPG recognizes that there should be varying types of provision,
such as:

- ‘Doorstep playable space’ for the under 5s
- ‘Local playable space’ for children up to 11 years
- ‘Neighbourhood playable space’, providing more extensive areas, mainly for
  children up to 11 years
- ‘Youth Space’, for young people aged 12 and above

6.3.30 Taking into account an existing deficit in formal play areas across the Borough
(including within the wards nearest to the application site), it is proposed that the
on-site play provision be self-sufficient across all age groups and in accordance with
the 10sqm per child requirement. The scheme includes the following:

- Doorstep playable space for the under 5’s comprising two private areas and two
  publicly accessible areas.
- Local play space for the 5 to 11 age group in the form of two publicly accessible
  areas.
- A zone dedicated for youth play space for the over 12’s adjacent to the main
  Tote.
- Informal amenity space throughout the site providing opportunities for
  incidental play.

6.3.31 Full details on how the child yield calculations have been applied and details on the
nature of the proposed play facilities are outlined in the Play Strategy (contained
within the Landscaping, Biodiversity and Open Space Strategy).

**D) TRANSPORT CONSIDERATIONS**

6.4.1 The applications have been prepared in full consultation with the Council’s highways
officers and Transport for London. Full details, including an assessment against
PPG13 (Transport) and the relevant Development Plan policies, are provided in the Transport Assessment and Travel Plan accompanying the submission.

Site Access

6.4.2 Following discussions with the Council, it has been agreed that the vehicular access into the site from Rushcroft Road is not desirable. It is therefore proposed that all vehicular access be direct from Chingford Road. Two access points, one to north of the Tote building and one to the south, were originally proposed. However, in responding to concerns relating to the use of a southern access from Chingford Road (due to potential difficulties turning right into and out of the site), the sole vehicular access into the site is to be via the existing entrance to the north of the main Tote. To accommodate the traffic generated by the development proposals, Chingford Road will be widened at the main access to provide a right turn lane into the site in the form of a ghost island priority junction.

6.4.3 Within the site, two main streets are proposed, one to the north of the central housing block, and one to the south. The two roads are linked via a shared-surface route that runs to the rear of the main Tote building. Each of the internal roads is designed to give pedestrian-priority and to accord with home-zone principles.

Traffic Generation

6.4.4 Whilst it is accepted that strategic road network in proximity to the site is close to capacity, the additional traffic generated by the proposed development (which is calculated as 89 and 135 additional vehicle movements in morning and afternoon peak periods, respectively) is not held to have a significant impact. Full details on the trip generation analysis and highways modelling are outlined in the Transport Assessment.

Pedestrian and Cycle Accessibility

6.4.5 As outlined in preceding sections of this Statement, and in accordance with both strategic and local policy objectives, the proposal will enhance conditions for walking and cycling and will improve permeability across the site. New entrances into the site for pedestrians and cyclists will create a north to south route across the site connecting Rushcroft Road and the existing pedestrian/cycle route along the southern boundary of the site. Each of the new links is designed to be both safe and attractive.

Parking Provision – On and Off Street

6.4.6 Policy 3C.23 (Parking Strategy) states that the Mayor will seek to ensure that on-site car parking at new developments is the minimum necessary and that there is no over-provision that could undermine the use of more sustainable non-car modes. The only exception to this approach will be to ensure that developments are accessible for disabled people.
6.4.7 The maximum standards are for 1 to 2 spaces for four bed units, 1 to 1.5 spaces for three bed units and less than 1 space for one and two bed units. Provision for leisure and other uses should reflect public transport, pedestrian and cycle accessibility. Policy 6.13 of the draft replacement London Plan notes that for leisure centres of less than 1000sqm in size, no parking is required.

6.4.8 In total the proposal provides the following level of parking provision:

- Approximately 221 car parking spaces are to be provided for prospective residents, including 119 spaces on new roads within the site, 93 off-street spaces (undercroft parking area), 7 visitor spaces adjacent to the south of the Tote car park and 2 car club bays. This equates to approximately 0.73 spaces per unit.
- Approximately 53 car parking spaces are to be provided for the proposed nursery and leisure uses (8 spaces adjacent to the northern access road for use as a drop off and pick for the nursery, 35 spaces in the lower deck of the Tote car park and 10 surface spaces south of the Tote car park).
- The scheme is to be ‘future-proofed’ to allow for the provision of charging points for electric vehicles (for a minimum of 20% of the total car parking provision).
- Appropriate provision is to be made available for cycle parking, including a minimum of one space per one / two bedroom unit and two spaces per three plus bedroom units. In addition, cycle spaces will be provided at ground level for visitors to the development.
- The provision of one car club vehicle for shared use with one additional space provided to accommodate a further vehicle if the demand is sufficient.

6.4.9 Policy 3C.22 of the London Plan states that car parking is to be the 'minimum necessary' and, in areas of good public transport accessibility, provision should be less than 1 space per unit. Waltham Forest's car parking standards similarly suggest a maximum of 1 space per unit, but with support for reduced provision in certain contexts. Policy CS4 of the emerging Core Strategy goes further in strongly supporting an increase in the number of car free developments in accessible locations. The proposed parking provision falls within the maximum permitted standards and is considered to be justified in light of the overall housing mix, the site’s public transport accessibility and the implementation of Travel Plan measures to reduce reliance on the use of the car (see below). TfL has confirmed that the level of parking provision is reasonable and that additional parking is not necessary to meet the demands of the proposed development.

Undercroft Parking

6.4.10 In order to optimize the use of the site and to maximize the extent of landscaping, it is proposed that an element of the car parking provision be provided in an undercroft space beneath the raised central garden. The undercroft space is
designed to meet the Council’s crime and security objectives for this form of parking provision.

*Travel Plan Initiatives*

6.4.11 In accordance with London Plan Policy 6.3 and UDP Policy TSP9 a Travel Plan has been prepared to encourage sustainable travel and to reduce the need for residents to own a car. This will include the provision of travel information initiatives, on-site measures to promote walking and cycling and incentives to use local public transport and a new city car club scheme. It is proposed that the Travel Plan be secured and monitored through a Section 106 agreement.

*Highways Obligations*

6.4.12 L&Q is willing to consider the provision of a planning contribution, if considered necessary, to improve the local highways network and towards public transport improvements. The details are subject to on-going discussions and Transport for London has indicated that a contribution might be sought to mitigate the demand for additional bus trips stemming from the proposed development.

**E) ENVIRONMENTAL CONSIDERATIONS**

*Flood Risk*

6.5.1 In recognising that the site falls within Flood Zones 3a and 2, as identified on the Environment Agency’s Flood Risk Maps, the application is accompanied by a full Flood Risk Assessment outlining the proposed flood risk attenuation and management proposals. This Assessment has been drawn up in consultation with the Environment Agency and responds to the requirements of PPS25 and the relevant Development Plan Policies (Policies 4A.12, 4A.13 and 4A.14 of the London Plan and Policies WPM15 and WPM18 of the UDP).

6.5.2 A fundamental benefit of the scheme is the integration (or de-culverting) of the River Ching into the development which will contribute to the mitigation of flood risk and will enhance the value of the Blue Ribbon Network in accordance with London Plan Policy 4C.3. New footpaths and open spaces are to be created adjacent to the naturalised river channel to enhance its habitat value and to promote public enjoyment of the space.

6.5.3 Surface water run-off will be attenuated on site and discharged to the Ching at a reduced rate. Sufficient on-site attenuation will be provided in order to manage the 1 in 100 annual probability storm inclusive of a 30% allowance for changing climatic conditions. The surface water management proposals include permeable paving and some green roofing.

6.5.4 PPS25 requires that a sequential test be applied to demonstrate that there are no reasonably available sites in areas with a lower probability of flooding that
would be appropriate to the type of development or land use proposed. The PPS25 Sequential and Exception Test prepared to accompany this submission concludes that none of the alternative development locations assessed would represent sequentially preferable locations based on an appropriate assessment of flood risk and other planning considerations.

**Climate Change**

6.5.5 PPS1 sets out the Government's objective to deliver sustainable development. This is supplemented by PPS1: Planning and Climate Change which sets out a target of reducing carbon dioxide emissions by 60% by 2050. Development Plan policies provide further elaboration on how developments will be expected to maximise resource efficiency and incorporate renewable and/or decentralised energy with the London Plan setting out a hierarchy for developments to Be Lean, Be Clean and Be Green. More specifically, Policy 5.2 of the Draft Replacement London Plan states that developments should seek to minimise Carbon Dioxide Emissions by 55% over 2006 Part L Building Regulations.

6.5.6 In responding to these policy objectives, the applicant has put forward a strategy that adopts a combination of energy conservation measures, low carbon technologies, and possible renewable technologies, to meet the 55% improvement target. Full details are provided in the energy strategy accompanying the applications.

6.5.7 A Gas Fired Combined Heat and Power (CHP) unit will be installed at ground floor level in the eight storey building in the south west corner of the site. This will serve all the dwellings and the non-domestic buildings. The possibility of providing connections to the adjoining school, for joint use of the CHP system, is also being explored. At the same time, improvements to the building fabric and the heating systems in the residential units will result in a further reduction in carbon emissions.

6.5.8 In line with the energy hierarchy the energy strategy also considers the potential for further emission savings from onsite renewable technologies. A 5% reduction could be achieved through either Photovoltaic’s (to the roof areas of certain south facing elevations) or the use of a biomass boiler.

6.5.9 L&Q is committed to achieving a Level 4* rating as set out through the Code for Sustainable Homes (CSH) for all of the residential units. It is our understanding that this will be the first Code 4 scheme of this size in the Borough.

**Other Environmental Considerations**

6.5.10 Although the proposal does not constitute EIA development, a series of specialist environmental reports have been prepared to accompany this submission. Subject to appropriate remediation and mitigation it is not considered that any of these matters would adversely impact upon the proposed development.
Biodiversity

6.5.11 As outlined in the Landscape, Open Space and Biodiversity Strategy, the proposal provides an opportunity to enhance the ecological value of the site. The scheme includes measures to enhance linkages to surrounding green spaces, to allow for the de-culverting of the River Ching and the creation of open spaces adjacent to it, and to introduce native tree and shrubs into the site to create new habitats.

Noise

6.5.12 The worst case façades, where closest to Chingford Road, fall into Noise Exposure Category C, with the remainder being designated as Noise Exposure Category B. Appropriate internal noise criteria are proposed in the Noise Assessment accompanying the applications and are considered to be achievable using conventional constructions.

Contamination

6.5.13 A Preliminary Contamination Assessment has identified the risks associated with potential contaminated land at the site to range from Low to Moderate. An intrusive investigation including soil sampling and laboratory testing, has subsequently been undertaken at the site and it is recommended that an asbestos survey be undertaken on all buildings prior to any refurbishment or demolition.

Archaeology

6.5.14 Parts of the site lie within an Archaeological Priority Zone defined in the Borough’s Unitary Development Plan Proposals Map. The Assessment accompanying the applications indicates that redevelopment of the site is unlikely to have a significant or widespread archaeological impact, although it is suggested that a programme of archaeological evaluation be carried out prior to the commencement of development.

F) PLANNING OBLIGATIONS

6.6.1 The applicant accepts that the proposed development may result in various impacts that may need to be mitigated through planning obligations. Potential obligations that the applicant is willing to consider as heads of terms within the Section 106 Agreement, and which are to be assessed in the context of the overall viability of the proposed development, are as follows:

- The provision of affordable housing provision to an agreed housing mix, tenure and rent levels
- A contribution towards local school provision
- A health care contribution
- On-site and off-site leisure contributions
• Highways works through a Section 278 agreement
• Contributions towards a possible local Controlled Parking Zone
• Sustainable transport initiatives including improvements to capacity on the local bus routes and contributions to a City Car Club scheme
• On site public realm enhancements
• Constructions skills and training provision
• Public access arrangements
• Air Quality contribution
• Flood mitigation works on and adjacent to the site
7.0 SUMMARY

7.1 Having regard to the relevant Development Plan policies outlined in this Statement, the proposal provides an opportunity to meet the following design and redevelopment objectives:

- To promote a regeneration scheme that will enhance the quality and appearance of the site, secure physical and environmental improvements to the Borough and ensure the delivery of key benefits for local communities.

- To assist the Council in meeting a significant proportion of its annual housing requirements. The application site is identified as a ‘Key Site’ by the Borough in helping to deliver its housing growth plan.

- To complement the new housing with a vibrant mix of leisure and community uses that will create a liveable environment and enhance public access (on a site where access is currently restricted).

- To introduce viable long-term use for the site as a whole and for the retained listed buildings. L&Q has commissioned research which demonstrates that the reinstatement of the former use would not be financially viable (even with a significant amount of enabling development).

- To optimise the use of the site. Whilst the proposal marginally exceeds the indicative guidelines, the proposed density is considered to be appropriate for a site of this size and in this location taking into account subject to the quality of the proposed design.

- To improve housing quality and choice by:
  - Maximising the provision of affordable housing on the site taking into account the overall viability of the proposed development. A mix of affordable rented, intermediate and private housing is proposed, with a minimum of 40% affordable housing (expressed in terms of habitable rooms).
  - Providing a good housing mix, including provision for family houses with private gardens (particularly where offered for affordable rent).
  - Delivering a high quality and accessible living environment that will provide an excellent standard of accommodation and amenity for prospective occupants. The proposal seeks to respond to emerging room and unit size standards and to fall within the highest category under the CABE ‘Building for Life’ Assessment.

- To positively respond to the site’s heritage status by allowing for the retention of the listed buildings, giving them a viable use and setting, and allowing their appreciation to a wider audience.
• To deliver a modern architectural form that frames the retained listed buildings (but does not compete with them), that is appropriate to the iconic nature of the site, that complements the character of the surrounding area and that creates an attractive and safe environment in which to live, work and visit.

• To respect the amenity of existing and prospective residents in terms of privacy, sense of enclosure, daylight and sunlight.

• To accommodate a suitable level of car parking provision, to implement measures to promote more sustainable transport options and to maximise connectivity within and across the site.

• To adopt an innovative energy strategy that uses a combination of energy conservation measures, low carbon technologies, and possible renewable technologies.

• To mitigate against any possible impact of the development through a range of potential planning obligations.

7.2 L&Q has consulted widely on its proposals with the local authority, the GLA, other statutory consultees and local communities. The design has evolved to address the comments received and these applications represent the culmination of this detailed pre-application consultation.
## APPENDIX 1

### Walthamstow Stadium and Car Park Site – Planning History

Source: London Borough of Waltham Forest On-Line Planning Application Search

<table>
<thead>
<tr>
<th>LPA Reference Number</th>
<th>Description</th>
<th>Date of Decision</th>
<th>Decision</th>
</tr>
</thead>
<tbody>
<tr>
<td>2010/1195/EIA Regula</td>
<td>An application for a screening opinion. Demolition of existing (unlisted) buildings, retention and conversion of listed buildings (including Tote board and kennels) for leisure and commercial purposes. Residential accommodation comprising 1, 2, 3 and 4 bedroom dwellings for both private and affordable housing (approximately 300 units) and associated private, commercial and public open space, car, motorcycle and cycle parking and associated access primarily through the existing Chingford Road entrance.</td>
<td>30-09-2010</td>
<td>Council’s Views (Proposal would not constitute EIA Development)</td>
</tr>
<tr>
<td>2008/1583</td>
<td>Erection of temporary security fencing along the Western boundary of the site and Harris fencing to be fixed internally to Tote board building, as shown in drawing referenced BP2553D0002P1, PB2553D0003P1, and PB2553d0004P1 received 4th September 2008.</td>
<td>17-09-2008</td>
<td>Approved</td>
</tr>
<tr>
<td>2008/1584/LB</td>
<td>A listed building application for erection of temporary security fencing along the western boundary of the site and Harris fencing to be fixed internally to Tote board building as shown on drawing nos PB2553D0002P1, PB2553D0003P1 and PB2553D0003P1 received on 30 October 2008.</td>
<td>17-09-2008</td>
<td>Approved</td>
</tr>
<tr>
<td>2008/1627/EIA Regula</td>
<td>An application for a screening opinion - Demolition of existing (unlisted) buildings, retention and conversion of (Tote board) building for use for commercial and residential purposes, retention of listed dog Kennels to the rear of site and redevelopment of remainder of site to provide: (1)Private and affordable housing (530 single family and residential flats comprising a mix of 1, 2, 3 and 4 bedroom units. (2)1200sqm of commercial floorspace provision of car, motorcycle, cycle store and car club.</td>
<td>02-10-2008</td>
<td>Council’s Views (Proposal would not constitute EIA Development)</td>
</tr>
<tr>
<td>2008/2009/LB</td>
<td>A listed building consent application for part demolition of brick wall (max length 2m) for temporary period and reinstatement within 8 weeks. As shown on site plan Land Registry Extract EGL 328053 received on 8th December 2008.</td>
<td>16-12-2008</td>
<td>Approved</td>
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<td>Reference</td>
<td>Description</td>
<td>Date of Decision</td>
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<td>-------------</td>
<td>------------------</td>
<td>---------</td>
</tr>
<tr>
<td>2002/0489/ADV</td>
<td>Installation of 1 x 96 sheet and 5 x 48 sheet free-standing, commercial advertisements panels (with overhead illumination). Data Load - Installation of 1 x 96 sheet and 5 x 48 sheet free-standing, commercial advertisements panels (with overhead illumination). appeal allowed for 5 x 48. appeal dismissed for 1 x 96.</td>
<td>11-04-2002</td>
<td>Appeal Lodged (Decision not stated on Council’s website)</td>
</tr>
<tr>
<td>1998/0095</td>
<td>ALTERATIONS TO EXISTING FENCING AND ERECTION OF ADVERTISING PANELS/SIGNS.</td>
<td>27-01-1998</td>
<td>Refused</td>
</tr>
<tr>
<td>1998/0532</td>
<td>CONTINUATION OF USE OF MULTI-STOREY CAR PARK FOR CAR AUCTION ONE DAY PER WEEK, 9.00AM TO 6.00PM. PROVISION FOR PARKING. LPC 31.08.99</td>
<td>17-06-1998</td>
<td>Approved</td>
</tr>
<tr>
<td>1996/0690</td>
<td>CONTINUATION OF USE OF MULTI-STOREY CAR PARK FOR CAR AUCTIONS ONE DAY PER WEEK BETWEEN 9.00AM-6.00PM. PROVISION FOR PARKING.</td>
<td>Not stated</td>
<td>Approved</td>
</tr>
<tr>
<td>1992/0973</td>
<td>CONTINUATION OF USE OF MULTI STOREY CAR PARK FOR CAR AUCTION ONE DAY PER WEEK BETWEEN 9.30 am AND 6.00 pm PROVISION FOR PARKING ON EXISTING OPEN CAR PARK</td>
<td>24-12-1992</td>
<td>Approved</td>
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<tr>
<td>1994/0119</td>
<td>CONTINUATION OF USE OF MULTI STOREY CAR PARK FOR CAR AUCTIONS ONE DAY PER WEEK BETWEEN 9.00 AM-6.00 PM. PROVISION FOR PARKING ON EXISTING OPEN CAR PARK</td>
<td>15-02-1994</td>
<td>Approved</td>
</tr>
<tr>
<td>1994/0281</td>
<td>USE FOR CAR BOOT SALES ON SUNDAYS ONLY</td>
<td>26-04-1994</td>
<td>Complete</td>
</tr>
<tr>
<td>1995/0087</td>
<td>ERECTION OF PREFABRICATED GARAGE</td>
<td>03-02-1995</td>
<td>Appeal Decided</td>
</tr>
<tr>
<td>1987/09701</td>
<td>EXTENSION TO BAR AREA (CHARLIE CHANS NIGHTCLUB)</td>
<td>23-10-1987</td>
<td>Approved</td>
</tr>
<tr>
<td>1985/0447</td>
<td>ERECTION OF 2 SINGLE STOREY REAR EXTENSIONS TO PRIVATE CLUB (CHARLIE CHANS NIGHTCLUB)</td>
<td>14-06-1985</td>
<td>Approved</td>
</tr>
<tr>
<td>1983/0749</td>
<td>C.O.U OF STADIUM CAR PARK TO SUNDAY MARKET.</td>
<td>25-11-1983</td>
<td>Complete</td>
</tr>
<tr>
<td>1982/0095/ADV</td>
<td>CAR PARK SITE - ERECTION OF 2 X 48 SHEET HOARDINGS.</td>
<td>06-12-1982</td>
<td>Refused</td>
</tr>
<tr>
<td>1980/0769</td>
<td>C.O.U OF EXISTING BUILDINGS (STAND &amp; TOTALISER) TO PROVIDE A CLUB TO INCLUDE RESTAURANT, ENTERTAINMENT CENTRE,(INCLUDING LIVE ENTERTAINMENT, GENERAL DANCING &amp; DISCO DANCING) &amp; PRIVATE FUNCTIONS COMPLEX</td>
<td>30-09-1980</td>
<td>Refused (Allowed at Appeal)</td>
</tr>
<tr>
<td>1980/0285</td>
<td>CAR PARK SITE - USE FOR DISPLAY &amp; SALE OF CARS ON SUNDAYS</td>
<td>22-07-1980</td>
<td>Refused</td>
</tr>
<tr>
<td>1979/0049</td>
<td>CAR PARK SITE - SUNDAY TRADING SITE.</td>
<td>01-01-1980</td>
<td>Withdrawn</td>
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<tr>
<td>Application Number</td>
<td>Description</td>
<td>Date</td>
<td>Decision</td>
</tr>
<tr>
<td>--------------------</td>
<td>-------------</td>
<td>------</td>
<td>----------</td>
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<tr>
<td>1973/1120</td>
<td>ERECTION OF 4 STOREY CAR PARK &amp; ALTERATIONS TO ACCESS.</td>
<td>05-06-1974</td>
<td>Refused</td>
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<tr>
<td>1973/0701</td>
<td>CAR PARK SITE – OPEN AIR MARKET</td>
<td>01-01-1974</td>
<td>Withdrawn</td>
</tr>
</tbody>
</table>
APPENDIX 2

Extract from the UDP Proposals Map
KEY

Economy, Industry and Commerce
- Strategic Employment Area
- Growth Employment Area
- Local Employment Area
- New Road Linking Beckenham to Bexleyheath
- Local Valley Regeneration Corridor
- Mixed Use Regeneration Area

Housing
- Proposed Housing Sites
- Major Opportunity Sites
- Non-Traditionally Constructed Estates

Town Centres, Retailing and Leisure
- Woodside Major Centre
- District Centres
- Primary Shopping Frontages
- Secondary Shopping Frontages
- Neighbourhood Centre
- Neighbourhood Retail Parades
- Local Retail Parades

Community Services
- Site For Community Services Use

Transport
- Crossrail 2 Safeguarding Line
- Key Sites (some monitoring post)
- Safeguarding of Sites for new or unused use in conjunction with the Channel Tunnel Rail Link
- TSH1 (Transport for London Road Network)
- TSH2
- TSH3
- TSH4

Open Environment
- Metropolitan Green Belt
- Metropolitan Open Land
- Site of Special Scientific Interest
- Principal Site of Nature Conservation Importance
- Site of Local Nature Conservation Importance
- Local Nature Reserve
- Park
- Parks and Gardens of Local Historic Interest
- Allotment Site
- Playing Field
- Green Corridor
- Lee Valley Regional Park
- Lee Valley Pathway Corridor

Built and Historic Environment
- Conservation Area
- Area of Special Character
- Archaeological Priority Zone

Produced by EDD Cartography Ltd.
Maidenhead, Berkshire, SL6 9FR, 2006
APPENDIX 3

Summary of Relevant Development Plan Policies

Regeneration Context

Adopted London Plan 3A.1 Increasing London’s Supply of Housing
3A.2 Borough Housing Targets

Emerging London Plan 3.3 Increasing Housing Supply

Adopted UDP HSG5 Redevelopment of redundant or underused land and buildings for housing

Emerging Core Strategy/DPD SP17 Urban Regeneration

CS1 Location and Management of Growth
CS2 Improving Housing Quality and Choice

The Proposed Loss of the Former Greyhound Stadium

Adopted London Plan 3A.18 Protection/Enhancement of Social Infrastructure and Community Facilities

Emerging London Plan 3.17 Protection and Enhancement of Social Infrastructure
Adopted UDP 3.20 Sports Facilities

4.6 Support and Enhance the Provision for Arts, Culture and Entertainment

Adopted UDP TRL16 Arts, Culture and Entertainment Facilities

Emerging Core Strategy /DPD CS11 Tourism Development and Visitor Attractions

DMP23 Tourism Development and Visitor Attractions

The Proposed Mix of Uses and Associated Community Benefits

Adopted London Plan 2A.9 The Suburbs

Emerging London Plan 4B.1 Design Principles for a Compact City

7.1 Building London’s Neighbourhoods and Communities

Adopted UDP HSG4 Mixed Use Schemes - The Urban Renaissance

TRL16 Arts, Culture and Entertainment Facilities
TRL17 Indoor Leisure and Recreation

GCS1 Provision of community sites and buildings

Residential Density

Adopted London Plan 3A.3 Maximising the Potential of Sites

Emerging London Plan 3A.4 Optimising Housing Potential

Adopted UDP PSC4 Residential Density

Emerging Core Strategy/DPD CS1 Location and Management of Growth

DM8 Housing Quality and Accessibility

Housing Tenure and Affordable Housing Provision

Adopted London Plan 3A.9 Affordable Housing Targets
3A.10 Negotiating Affordable Housing
Emerging London Plan 3.10 Mixed and Balanced Communities
3.12 Affordable Housing Targets
3.13 Negotiating Affordable Housing

Adopted UDP HSG6 Affordable Housing Target From All Sources
Emerging Core Strategy/DPD CS2 Affordable Housing
DM3 Affordable Housing Provision

**Housing Mix**
Adopted London Plan 3A.5 Housing Choice
Emerging London Plan 3.8 Housing Choice
Adopted UDP HSG9 Size of Units
Emerging Core Strategy/DPD CS2 Housing for Disabled People
DM5 Housing Mix

**Residential Design Standards**
Adopted London Plan 3A.6 Quality of New Housing Provision
4A.5 Creating and Inclusive Environment
Emerging London Plan 3.5 Quality and Housing Design
Adopted UDP PSC2 Amenity open space
Emerging Core Strategy/DPD CS2 Improving Housing Quality and Choice
DM7 Internal and External Amenity Space Standards
DM8 Housing Quality and Accessibility

**Playspace Provision**
Adopted London Plan 3D.13 Children and Young People’s Play
Emerging London Plan 3.6 Children and Young People’s Play
Adopted UDP ENV17 Play Areas
Emerging Core Strategy/DPD DM13 Open Space, Sport and Recreation

**Listed Building and Heritage Considerations**
Adopted London Plan 4B.12 Heritage Conservation
4B.13 Historic Conservation-led Regeneration
4B.15 Archaeology
Emerging London Plan 7.8 Protection of Heritage Assets
7.9 Heritage led Regeneration
Adopted UDP BHE14 Statutorily Listed Buildings
BHE17 Archaeological Heritage
Emerging Core Strategy/DPD CS12 Protecting and Enhancing Heritage Assets

**Design Criteria**
Adopted London Plan 4B.1 Design Principles for a Compact City
4B.2 Promoting World Class Architecture and Design
4B.3 Enhancing the Quality of the Public Realm
4B.9 Tall Buildings
Emerging London Plan 7.2 Inclusive Environment
7.3 Secure by Design
7.4 Local Character
7.5 Public Realm
7.6 Architecture
7.7 Location and Design of Tall Buildings

Adopted UDP
SP2 Urban Design
SP13 Residential Development – High Standards of Design
BHE1 Urban Design
BHE2 Urban Design
BHE5 Access for All
BHE6 High Buildings
BHE7 Community Safety / Designing Out Crime
BHE10/11 Environmental Improvements

Emerging Core Strategy/DPD
CS15 Promote Distinctiveness and Sense of Place
DM8 Housing Quality
DM30 Design Principles
DM32 Tall Buildings

Residential Amenity

Adopted UDP
PCS3 Privacy and overlooking
BHE3 Impact on Neighbouring Properties

Emerging Core Strategy/DPD
DM33 Managing Impact of Development on Occupiers and Neighbours
Urban Design SPD

Landscaping and Open Space

Adopted London Plan
3D.8 Realising the Value of Open Space and Green Infrastructure
4B.3 Enhancing the Quality of the Public Realm

Emerging London Plan
7.5 Public Realm
7.18 Protecting Local Natural Space

Adopted UDP
ENV16 New Open Spaces
ENV22 Trees

Emerging Core Strategy/DPD
CS6 Protection and Enhancement of the Natural Environment
DM13 Open Space, Sport and Recreation

Transport, Traffic and Access

Adopted London Plan
3C.2 Matching development to transport capacity
3C.3 Sustainable transport in London
3C.9 Increasing the capacity, quality and integration of public transport to meet London's needs
3C.20 Improving conditions for buses
3C.21 Improving conditions for walking
3C.22 Improving conditions for cycling

Emerging London Plan
6.9 Cycling
4.10 Walking
6.12 Road network capacity

Adopted UDP
TSP1 Public Transport - general
TSP2 Buses
TSP4 Pedestrians and Disabled People
TSP5 Cycling
TSP9 Developments with Significant Transport Implications
TSP16 Traffic Management

Emerging Core Strategy/DPD
BHE4 Transport and Parking Implications
CS8 Developing Sustainable Transport
DM14 Coordinating Land Use and Transport
DM15 Sustainable Transport Network
DM16 Managing Private Transport

Parking Provision – On and Off Street

Adopted London Plan
6.13 Parking
Adopted UDP
TSP17 Parking
Emerging Core Strategy/DPD
DM17 Parking

Flood Risk and Blue Ribbon Network

Adopted London Plan
4A.12 Flooding
4A.13 Flood Risk Management
4A.14 Sustainable Drainage
4C.3 The Natural Value of the Blue Ribbon Network
Emerging London Plan
5.12 Flood Risk Management
5.13 Sustainable Drainage
7.24 Blue Ribbon Network
7.27 Blue Ribbon Network
7.28 Restoration of the Blue Ribbon Network
Adopted UDP
WPM15 Protection of Surface Waters
WPM18 Flood Risk
WPM19 Surface Water Run off
Emerging Core Strategy/DPD
CS5 Minimising and Adapting to Climate Change
DM35 Water

Climate Change

Adopted London Plan
4A.1 Tackling Climate Change
4A.3 Sustainable Design and Construction
4A.6 Assessment of Energy Demand
4A.7 Renewable Energy
4A.9 Adaptation to Climate Change
Emerging London Plan
5.2 Minimising Carbon Dioxide Emissions
5.3 Sustainable Design and Construction
5.5 Decentralised Energy Networks
5.6 Decentralised Energy
5.7 Renewable Energy
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**Planning Obligations**

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APPENDIX 4

The Evolution of the Scheme Design

3.1.1 Following the appointment of project architects in August 2010 an initial design proposal was drawn up for discussion with the local planning authority and other interested parties. This initial proposal was informed by the Design Guide for Walthamstow Stadium as prepared by the Council in July 2009 and the illustrative scheme provided therein. The initial scheme featured the following key characteristics:

- Retained historic buildings used to provide a mixture of commercial and community uses.
- Building heights to respect the setting of the listed buildings, but with opportunities for increased building height towards the eastern end of the site to take advantage of the less sensitive setting.
- Linear residential streets that reflect the surrounding urban grain and the strong axial relationship between the listed Totes, picking up on the typography of long stands and surrounding roads.
- Pavilion buildings wrapping around the south and west edges of the site.
- The listed kennels to be retained and re-used.
- A main access from Rushcroft Road.
- An open central space to be retained and designed to evoke the original track, but reduced in size.
- The provision of north to south pedestrian and cycle links.
- Green space improvements and enhanced connections into the site.
- A new active frontage onto the existing pedestrian and cycle route.
- The de-culverting of the River Ching.

3.1.2 The proposal also benefitted from a consideration of the proposals drawn up by L&Q’s commercial partner in 2008. Although a planning application was never submitted in respect of the 2008 proposals, a series of pre-application meetings were held with both the local planning authority and the GLA, which led to a public exhibition of the proposals in January 2010. These proposals involved a scheme of up to 490 homes.

3.2 Scheme Evolution

3.2.1 There has been significant preparation in progressing the redevelopment proposal. The current scheme has been influenced by and benefited from comments and guidance received during the consultation process and from the long period of refinement. The following analysis demonstrate how the scheme has evolved since August 2010 to reflect the many discussions held with the local authority, the GLA, statutory consultees and local communities.

Early October 2010
The access route from Rushcroft Road was omitted following feedback from LBWF.

The main access was relocated to the north of the main Tote building with a secondary access located adjacent to the ‘Popular’ entrance to the south.

The central space was widened to reflect feedback from the Council’s design officer and English Heritage.

The visual connection between two Tote boards and the setting of the listed buildings was enhanced.

The external space was developed to be of a symmetrical form, echoing the architecture of the proposed buildings.

A ten-storey, unique building was added in the south-east corner of the site following feedback from LBWF.

**Late October 2010**

- A pedestrian route was added, providing access to Rush Croft Sports College with mews houses creating an active frontage.
- The Tote building was extended to provide appropriate leisure facilities.

**January 2011**

- The height of the corner building was reduced from ten storeys to eight storeys following comments from the local communities and input from the GLA.
- A nursery was introduced at the entrance to the site following a meeting with LBWF Councillors.
- A cafe was introduced opposite the Tote following development of proposals for the Tote building.
- The form of the mews houses, pavilions and building to the south east of the site was altered following design development and to provide an improved standard of amenity.
- The proposed extension to the Tote was reduced following design development and consultation with Sport England.

**February 2011**

- A north-south route was introduced through the central blocks to link Rushcroft Road and Empress Avenue, following input from CABE.
- The area of the private gardens to the central blocks was increased following feedback from LBWF.
- The flats backing onto Empress Avenue were replaced with houses with longer gardens following feedback from LBWF and CABE.
- The length of the gardens to the houses was increased by one metre following input from LBWF and CABE.
- The width of the roads was increased following feedback from CABE and LBWF.
March 2011

- The pedestrian link to Rushcroft Road was omitted following discussions with local residents and the GLA and work carried out by L&Q’s transport consultant relating to ‘desire lines’.
- The riverside apartments were redesigned as a linear form following design development and feedback from the GLA. Views from the Sports Ground to the Kennels are maintained with a cut through the building at ground floor level.
- The design of the houses was revised to incorporate roof terraces.
- Further consideration was given to the design of the central blocks to provide a greater degree of articulation including the use of full height glazed entrance lobbies.

April to May 2011

- The incorporation of a shared surface route within the space to the rear of the main Tote building and the omission of the southern vehicular access following comments from the GLA and consultation with the LBWF highways department and a greater emphasis given to the northern site access.
- A reduction in the height of six houses in the north east corner of the site from part three/part four storeys to part two/part three storeys following consultation with adjoining residents on Rushcroft Road.
- Increased unit and room sizes to reflect advice from the GLA.
- Revisions to the design of the nursery building including a reduction in height and a greater separation distance to the boundary at first and second floor level.
- The removal of a house previously proposed adjacent to the southern pedestrian entrance from Chingford Road in order to open up the public space and improve the setting of the popular entrance.
- Revisions to the design of the mews buildings adjacent to the northern pedestrian entrance from Rushcroft Road including a reduction from three to two storeys following consultation with adjoining residents on Rushcroft Road.