



Former Walthamstow Stadium site

3 June 2011

Applicant: L&Q

**A COMPARATIVE ANALYSIS OF L&Q AND MORTON DEVELOPMENT
PROPOSALS**

No: 27

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1 Introduction

1.1 Introduction

This report provides a comparative evaluation of two proposals for the re-use of the former Walthamstow Stadium, London, N17. Our report has been prepared for L&Q in order to provide a robust comparative assessment of the two proposals which they intend to use to support their planning application.

The two proposals are:

- **L&Q** – a Registered (Housing) Provider who are the owners of the property, who propose a housing led scheme of 301 units, which will provide (40% by HRMS/35% by Units) new affordable homes together with new community and leisure accommodation (including a crèche, nursery, gym and juice bar); and
- **Mr Bob Morton** – an individual who proposes to refurbish the existing derelict stadium for greyhound racing use and to deliver 117 new affordable homes and a nightclub.

The property was purchased by L&Q in 2008 with the intention of developing the site to provide a housing led scheme with mixed use development. L&Q has prepared a planning application for their proposed scheme.

1.2 Background

The Walthamstow Stadium was opened in 1933 and was operated as a greyhound racing venue until 2008. In addition, the venue has operated a nightclub for a number of years up until its closure. The 'Tote' building which occupies the main frontage to the property is Listed and a local land mark.

The previous owners had operated the property for many years but we understand that due to reducing levels of profitability and their outlook for the business they closed the business and sold the property. We have prepared a detailed and fuller analysis of the Business Plan and viability as an Appendix to the GLA Paper attached to this report.

During their ownership L&Q has invested in preparation for a planning application which has been informed by statutory and public consultation with the local community and other key stakeholders, including a survey of residents to establish their preferences for the development of the site and has resulted in significant design evolution in the scheme to reflect feedback from a range of stakeholders.

1.3 Structure of this report

This report has been structured to provide a comparative analysis of the L&Q and Morton scheme proposals. It is comprised of:

- Introduction
- Planning – The planning context and evaluation of the proposal
- Affordable Housing Assessment.
- Analysis of Leisure Proposals.
- Commercial deliverability – examination of the commercial issues including financial viability of the Morton proposal only , specifically an assessment of the deliverability and sustainability of the Morton Business Plan for a new greyhound racing use.
- Our conclusions.

Financial analysis of the two proposals is addressed in two separate reports:

- **Morton scheme** - is the subject to a separate report (review of Mr. Morton's Proposals for Walthamstow Stadium – a briefing note for GLA dated 4 April 2011) which is included as an Appendix to this report.
- **L&Q scheme** - is subject to a separate detailed Viability Assessment appraisal and report (in support of the Section 106 Planning Agreement) which is subject to an open book negotiation between the Council and L&Q.

2 Planning and Design Assessment

2.1 Policy Assessment of the Morton Scheme Spacelab, Draft Issue 18.08.10

2.1.1 Introduction

We have undertaken a planning assessment of both the schemes prepared by Mr Bob Morton (the 'Morton scheme') and L&Q for the redevelopment of Walthamstow Greyhound Stadium against statutory and emerging planning policies, at local and regional level.

The assessment is based on:

- Morton Scheme (117 units indicated as all affordable)
 - the drawings from the Draft Issue produced by Spacelab, dated 18 August 2010; and
 - the notes included in the Feasibility Study produced for the Morton scheme in July 2010.
- L&Q (301 units, 40% affordable by Habitable Room/ 35% by number of units)
 - the drawings and other documents submitted for the planning application dated 3rd June 2011.

Whilst the following is a summary assessment of the compliant and non-compliant features/ compliance challenges of the proposals, a full evaluation of the L&Q and Morton schemes is provided in the Planning Assessment tables included at Appendix A and Appendix C to the report prepared for the GLA included at Appendix B to this report.

However, our assessment is based on the relatively limited information available in the Morton proposal documentation and therefore these comments would need to be subject to the assessment of more detailed information regarding the scheme.

We provide a summary of both schemes in terms of a review of compliance with planning and design policy.

Table 1: Morton Scheme – Summary of Planning & Design Policy Compliance

Planning Consideration	Comment	Policy compliant
Flood plain	Housing use proposed in flood risk area. No evidence of any mitigation at present.	No
Archaeological priority zone	Compliance can be achieved	Yes
Heritage	Potentially significant changes to the southern half and upper floors/ramps of the Tote building and includes proposals to create a partially enclosed glazed roof over the kennels.	No
Mix of uses	The list of uses complies with the design guidance and the emerging CS.	Yes
Relationship of uses	The proximity of the housing development to the other uses raises concerns regarding residential amenity.	No
Residential mix (market and affordable)	All units to be affordable	Yes
Density	The proposed density exceeds the policy recommendations. The scheme density is higher, since the site available for residential development is constrained by the retention of the stadium.	No
Residential mix (total)	No family houses are proposed although the site has the opportunity to provide family houses.	No

Planning Consideration	Comment	Policy compliant
Lifetime Homes and wheelchair accessible housing	All residential units built to Lifetime Homes standards. 12 units should be wheelchair accessible but only 5 have been provided.	No
Design	Does not satisfy qualitative measures	No
Car & cycle parking	Inadequate given the location/PTAL rating	No
Open space	The provision of open space is very limited.	No
Residential amenity	Poor neighbourly context.	No
Play areas	Play areas – provision is made for 0-4 year old children only , but insufficient space is available to accommodate the required areas.	No
Community, sport and leisure facilities	Scheme does not meet priority facilities.	No
Sustainability	Code for Sustainable Homes 4 needed and BREEAM excellent rating.	Required
Connectivity/ Vehicular access	Council does not support residential vehicular access off Rushcroft Road.	No
Connectivity / Pedestrian environment	A better relationship could be created between the site and the existing open space to the south east.	No

Table 2: L&Q Scheme – Summary of Planning & Design Policy Compliance

Planning Consideration	Comment	Policy compliant
Flood plain	A Sequential Test has been successfully undertaken to support the development. An Exception Test might also be required.	Yes, subject to discussion
Archaeological priority zone	Compliance can be achieved.	Yes
Heritage	The scheme protects the setting of the listed buildings and enhances views to and between the buildings.	Yes
Mix of uses	The list of uses complies with the design guidance and the emerging CS.	Yes
Relationship of uses	The proposed uses will serve residents and the wider local community, and these are not detrimental to residential amenity.	Yes
Residential mix (market and affordable)	40% to be affordable.	Yes, subject to open book discussions with Council
Density	The proposed density exceeds the policy guidance but is justified in design terms.	Yes
Residential mix (total)	The scheme includes a mix of houses and flats.	Yes
Lifetime Homes and wheelchair accessible housing	All residential units built to Lifetime Homes standards, 10% is wheelchair accessible.	Yes
Design	The high quality design that respects and enhances the local context.	Yes
Height	The proposed heights respect the local context. The 8 storey building provides a key visual focus for the development.	Yes
Car & cycle parking	Adequate for the proposal.	Yes
Planning Consideration	Comment	Policy

		compliant
Open space	The provision of open space is adequate.	Yes
Residential amenity	The private amenity space provision is adequate.	Yes
Play areas	The provision of play area meets the policy requirements.	Yes
Community, sport and leisure facilities	Included in the Tote building and the current West Stand or nearby.	Yes
Sustainability	Code for Sustainable Homes Level 4 to be met. A CHP will be provided on site. Further studies might be needed.	Yes, subject to discussion
Connectivity/ Vehicular access	Access will be provided through the existing entrance from Chingford Road following substantial discussions with LBWH Highways. The impact on the highway network has been assessed as acceptable.	Yes
Connectivity / Pedestrian environment	The scheme creates a pedestrian/cycle friendly environment.	Yes

2.1.2 Compliant Features of the Morton scheme

Mix of uses

We consider that the Council would look favourably at the proposed mix of uses, which will serve the local community whilst providing new homes and maintaining the heritage aspect of the race track. Such mix may also be supported by some of the local politicians. However, there are a series of issues which we outline below.

2.1.3 Non-Compliance & Compliance Challenges for the Morton scheme

Flood plain

The scheme accommodates residential use to the southern part of the site, which lies within Flood Risk Zone 3a. No explanation has been given as to how flood risk will be addressed and mitigated. (The flood risk area is shown on drawing A11 at Appendix B).

Density

Local and regional planning guidance indicate that the appropriate density for this suburban context would be 200/250 hr/ha, which could be increased subject to design.

However, the figures provided by the Morton scheme result in a density of 510 dph against LBWF policy of 250 dph. Based on the number of habitable rooms against the UDP definition, the density would increase to 662.5 hr/ha. Even at c. 310 dph we estimate this would result in a loss of some 40% of the proposed dwellings.

The residential development scheme density is higher, since the site available for residential development is constrained by the retention of the stadium.

Residential mix

The proposed development is expected to have regard 'to the form, structure and function of the area. This policy is likely to gain importance under the emerging revised London Plan. Considering that the neighbouring properties of the site are two storey, family homes, the proposal should contain a proportion of family homes in addition to the proposed flats.

Heritage

The Tote Building and the kennels are Grade II listed but are indicated as being locally listed only. The scheme proposes potentially significant changes to these buildings, but no details have been shown to assess the actual heritage implications (see drawing A14 at Appendix B).

Height of the development

The height of the proposed building should respect the surrounding local character. The south-west end of the site is adjacent to a row of two storey terraced housing and, therefore, the residential blocks located in this area will have to be designed with a limited height or they will impose adversely on the existing housing.

Residential amenity and private open space

The balance between built-up area and private amenity space is not satisfactory. For instance, in Block B, only 24sqm is allowed for a 4 Bed Maisonette)

Moreover, to minimise overlooking it is proposed to erect a wooden structure to divide the residential area from the racing track, creating a barrier which will be visually detrimental to the future residents.

The proximity of the residential units to the other uses raises concerns in terms of acoustic amenity.

Connectivity

The location of the parking bays is not well connected with the main road and is not easily accessible by the residential buildings, providing the site with very poor connectivity.

The links between the site and the existing open space to the south east could be improved.

The access to the community facility/sport pitch in the central open space is not defined.

Sustainability

There is no reference to or cost allowance apparent to achieve the required Code for Sustainable Homes (Level 4).

Car and cycle parking

The number of proposed car and cycle parking spaces is not considered adequate to the number of future residents.

A site opposite which was previously in the ownership of the former stadium owner has since been sold. This raises concerns as to the pressure on the immediate area and residents from car borne traffic related to Stadium events but also the sustainability of the proposition where no alternative public transport investment is proposed or readily available.

Wheelchair accessible dwellings

The proposed residential development fails to provide 10% of wheelchair accessible units as required by LBWF. Only the 4 bed units have sufficient area to become wheelchair accessible units.

Transport Impact

The Morton proposals for the operation of a stadium business would have significant transport and traffic generation issues.

- The stadium operation previously used the car park site located close by on the south side of Chingford Road, which we understand provided car parking for up to some 500 vehicles. This site was sold by the previous stadium owners to a transport company (Hackney Community Transport) prior to closing the stadium.
- TPP Transport Consultants estimate that, assuming an average attendance of 1,667 people per meeting would generate car arrivals of between 450 and 800 respectively.
- The Morton Scheme proposal indicates car parking for 45 VIP stadium users only. We are not aware of any other car parking resources available for the operation of the stadium business.
- The site is located in a low PTAL area although the TPP analysis is based on average levels modal split between private and public transport use for London. In reality the modal bias toward private car based transport could be worse in this location due to the limitation on certain other public transport uses.
- We also note that the area was subject to a CPZ (Controlled Parking Zone) which was removed once the stadium had closed. This indicates that the operation of the stadium business was either having or anticipated to have a detrimental impact on congestion and parking in the local area to the stadium.
- We consider that the limited car parking provision indicated in the Morton proposal would have a very significant detrimental impact of the operational prospects for and sustainability of the business.
- One solution for car parking on site could be the provision of car parking at basement level beneath the greyhound racing track. We estimate that some 285 plus spaces could be accommodated in this location, although this would need to be subject to much further detailed analysis. We consider that the cost of this solution could be in excess of £6.25m without accounting for related costs of further flood mitigation, revised access etc.

We include a copy of the TPP Transport Review Bob Morton Scheme at Appendix G to the GLA report which is included within Appendix B to this report.

Social Impact

- Regeneris has undertaken an assessment of the potential social impact of the Morton proposal for Walthamstow Stadium. They conclude that it is likely to give rise to a number of adverse and long term social impacts resulting from this proposal. The provision of increased opportunities for gambling and consumption of alcohol with potentially disproportionate negative impacts on a sizeable vulnerable local population including a growth in problem gambling;
- the increased levels of car movements and on-street parking affecting in particular children and old people;
- the increased levels of air pollution affecting in particular pregnant women, children, old people and those with respiratory illnesses;
- the increased noise and nuisance levels for local residents, only a small proportion of whom have been users of the stadium historically; and
- the permanent loss of housing provision (184 units) for all local residents especially for the large numbers of those in need of housing in an area with 'exceptional needs for housing'.

2.1.4 Section 106

We note that the Morton scheme proposal includes an allowance of £585,000 for Section 106. This may be significant in that there is no explicit allowance that we have seen to address the accessibility of the stadium through investment in public transport or alternatively through acquisition of land to provide an alternative site.

2.1.5 Design considerations

The proposal presents no active frontages to the central open space or the existing pathway to the south, creating no opportunity for natural surveillance and undermining the vitality of the area.

The housing blocks do not integrate with the development site and with the residential context to the south. The proposed wooden structure that divides the residential area from the racing track acts as a visual and physical barrier that creates segregated areas.

Further design considerations such as height and connectivity are explored below.

- **Noise mitigation & Daylight to homes** - for residents of the new housing will be difficult. This does not appear to be addressed by a 'fence' structure extending the full height of apartment blocks which is visually detrimental and may restrict daylight to homes.
- **Amenity for residents** - to accommodate the proposed residential and dog racing track uses on the site, the amenity residential area is very limited and the housing blocks are located in close proximity to the neighbouring properties to the south.
- **Overlooking onto and from the racing track** – this is partially addressed by a louvered structure which is visually detrimental.
- **Access to the (central area) amenity** - is not defined. It is difficult to see how this will be achieved so as to provide a community space due to the conflict between public access & use and the private controlled environment required by the stadium operation.
- **Pedestrian, cycle and vehicular access** - to the housing blocks is not well defined, there are significant concerns in terms of emergency, delivery and refuse vehicle access.
- **Access via Rushcroft Road** - the principle of the Rushcroft Road's access to the site is not considered appropriate by LBWF. The vehicular route from Rushcroft Road to the residential parking spaces is too narrow and does not comprise a separate pedestrian route.
- **Non- Compliance with the Urban Design Guide** – the scheme designs do not appear to accommodate the de-culverting of the River Ching as required under the GLA's blue ribbon network. In the event that this were to be accommodated within the site boundary we believe that it would reduce the developable area for housing which would not be able to accommodate the scheme proposals. Block D is built on and over the culvert, leading to structural/ technical difficulties, and negotiations with the Environment Agency.
- **Non-Compliance with Mayoral and L&Q Design Standards** – the scheme does not appear to be compliant with the design standards required by both the Mayor and L&Q. (We provide at Appendix H of the GLA report included as Appendix B to this report) a summary of the scheme compliance with such standards).

Potentially this could represent a problem in relation to the disposal of the housing to other affordable housing providers who may have similar design standards. In such cases these organisations may be prevented from acquiring these units where the issues of non-compliance can not be mitigated.

It should be noted that the Morton scheme is in draft form. Should the design team amend the design whilst retaining the proposed mix of uses, the resulting proposal could be acceptable to the Council subject to some of the fundamental issues raised above.

However, such amendments could materially impact the financial viability of the scheme which in turn could impact its deliverability.

2.2 Policy assessment of the L&Q Scheme

2.2.1 Compliant Features of the L&Q scheme

Residential mix

The residential proposal comprises a mix of flats and family units (including houses) which reflects the housing character of the surrounding area and local need. This complies with the emerging regional and local planning policies, which emphasise that new developments should relate closely to the established local context.

Mix of uses

The proposal comprises a predominantly residential development in planning policy terms. Compared to the previous use of the site, the L&Q scheme, as a housing led development, results in a loss of leisure floorspace and therefore includes a community sports facility, a nursery, a café, crèche, play areas, allotments and open space for public use. This mix of uses will serve the residents as well as the wider local community.

The 'Sport and Business Case' to support the loss of Walthamstow Stadium as a greyhound racing and general sporting and leisure venue' confirmed that the new community sports facility will serve a wider spectrum of the local population than the stadium facility during its last few years.

Height of the development

The Council expects the design to respond positively to the surrounding local character.

The residential blocks proposed to the north of the site range from 3 to 4 storeys. The south-east corner of the site has potential for taller buildings and will accommodate a residential block which is stepped in height, being 5, 6 and 8 storeys high. The height of this block is a key design feature of the scheme and responds positively to the setting of the listed kennels.

The 3 & 4 storey houses to the south-west corner of the site are characterised by a set back top storey, which mitigate the visual impact on the neighbouring properties.

Residential amenity and private open space

The proposed residential units will benefit from a mix of private communal area, rear and front gardens, balconies and roof terraces, providing the future occupiers with high quality private amenity space.

Public open space

The proposal will deliver a generous provision of public open space, serving future residents and existing local community as well as facilitating the permeability between the site and the open space to the south-east.

Connectivity and pedestrian environment

The proposed tree-lined streets and the pedestrian and cycle links to the north, south and east of the site, will create a much needed pedestrian/cycle friendly environment, providing the permeability between Walthamstow Stadium and the local area advocated in the Urban Design Guidance.

Car parking

The number of proposed parking spaces for residents complies with planning policies.

It is considered that the location of part of the residential parking spaces in the covered central area is a positive feature of the development, which will contribute to the parking needs of the site through an environmentally friendly design “limiting car presence throughout the residential layout”.

Green Corridor and Bio-diversity

The L&Q proposal provides for de-culverting of the River Ching and creation of a green corridor along the edge of the site to provide additional amenity for residents and the local community.

2.2.2 Design considerations

The proposal is characterised by a high quality design approach, which respects and enhances the local context including:

- Three and four storey terraced houses proposed to the north of the site responding to the character of the surrounding context (terraced dwellings).
- Improved visibility of the listed buildings and preservation of their setting.
- Active frontages on main street and open space.
- Integration of public and private open space in the development, including pedestrian and cycle links.
- Appropriate distance between proposed residential blocks and existing neighbouring properties.

2.2.3 Section 106

The Section 106 contribution in relation to the L&Q proposal is yet to be agreed between the Council and L&Q.

2.3 Compliance Challenges for the L&Q scheme

Residential Density

L&Q's Scheme density for housing is slightly in excess of the Council's density policy. However, L&Q's response to this is to ensure, through c, that the scheme provides a high quality environment which we consider mitigates against a slightly elevated level of density.

Affordable Housing Provision

The scheme proposals are slightly below policy levels, however, L&Q are in discussions with the Council as to the level of affordable housing through an open book viability appraisal for the scheme.

Sustainability

The Energy Report indicates that the compliance with Code for Sustainable Homes Level 4 relates to energy only. Further details are needed to assess compliance with other areas.

The Council might require further information on renewable energy generation and a Code for Sustainable Homes and BREEAM Pre-Assessment.

Flood plain

The southern part of the site lies within Flood Risk Zone 3a. A Flood Risk Assessment has been produced which successfully addresses the Sequential Test in terms of compliance, in our view. The Council might require an Exception Test to support the application. L&Q believe its proposal to be acceptable following consultation with the Environment Agency to understand the flood risk and potential mitigation measures.

3 Affordable Housing Assessment

3.1 Introduction

We have reviewed the L&Q and Morton scheme proposals in terms of their respective affordable housing provision.

For the Morton scheme proposal our assessment is based on the limited design material available which comprises:

- Mr Morton's Business Plan dated July 2010.
- High level scheme designs by Spacelab, draft Issue 18.08.10.

Our financial viability assessment for both of the schemes is the subject of two separate reports as indicated at Section 1.3.

3.2 Morton Scheme

3.2.1 Affordable Housing Overview

We have assessed the scheme proposals from a market perspective in terms of design and assumptions as to value and housing grants in order to evaluate the feasibility and viability of the development proposal. Our key finding from the limited information available is that:

- the units meet the basic design guidance of the various regimes; but
- the value assessment is not sustainable; and
- the scheme is not financially viable.

3.2.2 Affordable Housing Outputs

The Morton scheme provides a total number of 117 units of which it is proposed 100% would be affordable. The specific tenure arrangements for these affordable units is not clear from the information provided. It appears that 60% would be some form of affordable ownership, whilst the balance would be 'social housing' - presumably rented.

3.2.3 Affordable Housing Design

The unit sizes and designs comply with some terms with the Homes and Community Agency's Design and Quality Standards and the London Housing Design Guide but not the majority. We have identified some areas of design where either the design is not ideal or there is information lacking.

- Rear gardens for the ground/first floor units appear small.
- The narrowness of the space between the stadium and the existing housing affords very constrained public realm and is a concern both in terms of quality of environment and marketability of the units.
- Proximity to the night club, and particularly the position of bedrooms which, in seeking to avoid overlooking the residential units on one side, are exposed to the conflicting use on the stadium/night club side.
- Proximity to the stadium itself (we note that Mr Morton's Business Plan suggests this is a positive aspect) is, at best, a mixed benefit.
- Peak traffic movements on race nights will negatively impact on residents.

- There is no information (and no cost identified) for the provision of environmental sustainability measures (Code for Sustainable Homes Level 4).
- The Morton scheme does not provide the equivalent level of affordable housing overall, compared with the L&Q scheme.

3.3 L&Q

3.3.1 Affordable Housing Overview

The L&Q scheme:

- seeks to maximise level of affordable housing;
- meets the Council's levels for tenure consistent with borough policy;
- housing typologies; and
- for sustainability standards, at Level 4 (Code for Sustainable Homes).

3.3.2 Affordable Housing Outputs and Outcomes

L&Q's objective for the site is to maximise the level of affordable housing within the scheme which provides for:

- 105 units in total (40% by HRMS/35% by Units);
- 52 of which are Affordable Rent (59% by HRMS/c50% by Units); and
- 53 of which are Shared Ownership (41% by HRMS/c50% by Units).

3.4 Affordable Housing Design

The scheme design is housing led and therefore the proposals provide for a high quality residential environment with the following key features:

- **A balanced community** is envisaged with both affordable and private housing.
- **Unit Typology** – the mix of houses and flats is designed to reflect the local context in accordance with the Council's policy.
- **Size** - Units are almost entirely compliant in terms of both unit and room sizes. A limited number of units fall below these standards due to physical site constraints and the need to meet other design outputs.
- **Lifetime Homes & Wheelchair Access** – the scheme is fully compliant with policy.
- **Open, Play and Residential Amenity Spaces** – open and play space meet and residential amenity space exceed required standards respectively.
- **Sustainability** – the scheme is designed to meet Code Level 4 Energy Requirements in relation to all tenure homes. Further sustainability studies might be required to support the proposal.

Further we conclude that benefits to all of the residents, regardless of tenure, will include:

- Integrated and high quality environment – the scheme is designed such that affordable tenures are indistinguishable from housing for sale and therefore benefits as do other tenures from a scheme with:
 - a high quality of design and amenity which is not compromised by the non-residential uses on the site;
 - access for all residents to the new nursery, leisure and café facilities.
 - retained listed structures in a manner which is both appropriate in terms of configuration and use and therefore the physical impact of their future use on all tenure homes;

- linkages to and with the immediate community and;
- access to the amenity and interest provided by the cultivated River Ching (which is to be opened up through and along the periphery of the site).

3.5 Summary of Affordable Housing Outputs

We summarise the key features of the affordable housing for each scheme in terms of outputs and outcomes:

Feature	Morton	L&Q
Total Affordable Housing Outputs	117(1)	105
Affordable Housing by Tenure	60% Affordable Ownerships. 40% "Social Housing" (2)	Affordable Rent: 40% Low Cost Home Ownership: 60%
Affordable Housing by Typology	100% flatted	65% Flat/Maisonette 35% Houses (rising to 46% when measured by HRMs)
Lifetimes Homes/Wheelchair accessibility	All residential units built to Lifetime Homes standards. 12 units should be wheelchair accessible but only 5 have been provided.	All residential units built to Lifetime Homes standards, 10% is wheelchair accessible.
Sustainability	No indication of scheme compliance of costs associated with delivery of standards.	Code for Sustainable Homes 4 needed and BREEAM excellent rating.

Notes:

1 We consider that this is not a realistic/ deliverable figure based both on our analysis of the Morton scheme financial proposals and the scheme design and layout.

2. The tenure assumptions are not explicitly made by the Morton Business plan, but are described in the residual value calculation that accompanies the cost plan.

We consider that there are several significant deficiencies in the Morton scheme compared with the L&Q schemes in relation to affordable housing:

- there are substantial risks as to the deliverability of the affordable housing in terms of viability;
- the affordable housing is not compliant in a number of key policy areas;
- in particular, we are concerned as to quality of the environment for the affordable housing residents given the proximity of housing to the Stadium and the proposed design solutions to physically separate the respective uses, promote noise mitigation etc.

This contrasts markedly with the L&Q proposals where L&Q has worked with the Council, other relevant bodies and through public consultation to promote a high quality scheme intended to meet local needs.

4 Analysis of Leisure Proposals

4.1 Introduction

We have analysed both scheme proposals in relation to the provision of leisure uses and the potential impact of these facilities on residents of the scheme.

4.2 Analysis of Morton Scheme Leisure Proposals

The Morton scheme is a primarily leisure led development proposal. We understand from our analysis of the Morton Business Plan that the proposed scheme would include the following leisure and community uses:

- Re-instated **Greyhound stadium and race track**.
- Centre of the track to accommodate community sport pitches.
- **Grandstand** to include bar, restaurant and jazz club.
- Gallery along stadium to accommodate raised viewing points and **merchandise kiosks**.
- Existing (closed) **night-club** below parking level to be refurbished and retained.

We comment on these proposals below.

- These uses are predominantly to be provided within the operational facilities of a new Stadium business and accessible by the community subject to usual commercial arrangements. The scheme does not appear to provide significant publicly (free) accessible recreation space or leisure facilities.
- It is not clear how the sports pitches are to be accessed by the public/ local community. It is assumed that use will be restricted due to:
 - the business operation of the Stadium;
 - the necessary arrangements for security and safety in separating out accessibility between the pitches and the rest of the Stadium environment; and
 - specifically, access between the new homes proposed and the pitches.

4.2.1 Adverse Considerations for the Morton Leisure Proposals

In the event that delivery can be achieved, the Morton scheme has the potential to deliver benefits to the existing local community and new residents. However, the Regeneris report (included as an Appendix to the GLA Paper at Appendix B) addressing social impacts of the Morton scheme highlights the potential for negative impacts directly related to the stadium leisure use, including:

- leisure and gambling - the report identifies potential for significant and potentially long term adverse social impact; and
- road traffic and congestion.

4.3 Analysis of L&Q Leisure and Community Proposals

It is proposed to establish a Community Sports Trust to oversee the running of the leisure centre. L&Q's non-residential proposals include:

- **Multi-Use Studios** - Four separate purpose built studios (two of 144m² and two of 100m²) that can be hired for a variety of community and sporting activities including dance-exercise classes, community functions,

children's play/gymnastics, young people's social gatherings, meetings, and specialist martial arts sports. The design of these areas accords with guidance from Sport England and relevant national governing bodies.

- **Gymnasium** - a gymnasium that will offer specialist training facilities in martial arts that supports Sport England's requirements under the Whole Sport Plan for specialist martial arts activities.
- A **reception, juice bar and social area**, to include community activity equipment (pool table, dart board, table tennis table, etc).
- A **Nursery** (743sqm).
- **Play space** - it is also proposed to create open access play facilities based on the three age groups of under 5s, 5 to 11 years and 12 years plus. Within the Plaza space adjacent to the eastern side of the community sports facility a variety of youth sporting stations are planned.
- A **crèche** (743 sqm GEA).
- **Allotments** - It is further proposed to establish a number of pocket allotments on site.

Other amenity space - In addition, the L&Q proposals include policy compliant levels of private residential space; open space and play space and in some instances the required levels are exceeded.

- **Stand alone car parking** for 45 cars.

The proposal is that the facility will be controlled by a Sports Trust with representation on the Board by L&Q and local organisations. Management will be on a commercial basis. Interest from operators has been received in this respect.

Once the community sports centre is fully operational it is anticipated that in excess of 5,000 user visits will be made in an average week (as identified in 'Sporting & Business Case – Walthamstow Stadium, June 2011 – RAE Sports & Leisure Consultants Ltd).

This would exceed the number of spectators attending Walthamstow Stadium in the last few years it was open. It is also anticipated that the facility will complement the existing sport and Physical Education programmes and aspirations of the adjoining Rush Croft College.

4.4 Comparative Analysis of Temporary and Permanent Employment Effects

In their report on the Social Impact of the respective schemes, Regeneris identify potential temporary and permanent employment effects. We summarise these as follows and also comment on the results below.

Employment Type	Morton (FTE)	L&Q(FTE)
New Residents (1)	62	162 (2)
Stadium Activities	95	-
Leisure Facilities (cafe, juice bar and studio)	-	24 gross and direct FTE positions
Crèche		Up to 59 total positions or c.45 FTE
(Construction)	19 (3)	200 (3)
Total FTE (Excl Construction)	157	c.242

(1) This is based upon the GLA's 2005 report "More residents, more jobs? The relationship between population, employment and accessibility in London" which concludes that for every 1000 additional residents on average around 230 new jobs are created.

(2) Unit numbers have changed since Regeneris prepared their report from 334 to 301 units and we have therefore applied the same multiplier effect to calculate the number of FTE.

(3) There may be a divergence between the methodology applied to calculate the jobs derived from Construction under the two schemes.

Further, we conclude:

- analysis indicates that the L&Q proposals would provide higher overall levels of full time employment;
- it is anticipated that of the construction jobs generated by the Morton scheme only 4 would be local; and
- employment opportunities provided at the Stadium are likely to require only low skill levels, offer little training and employee personal development and have a high turnover rate.

5 Commercial Deliverability of the Schemes

5.1 Introduction

In this section we address our evaluation of both the deliverability and sustainability of the two proposals. For each proposal we evaluate a range of key issues:

- robustness of assumptions supporting the respective Business Plans;
- project risks and certainty of delivery; and
- ability to implement development.

Our analysis of the Morton proposal is based on the Business Plan dated July 2010 provided by Mr Morton to L&Q.

Our analysis of the L&Q proposals is based on the full documentation submitted for the planning application.

Financial analysis of the respective scheme proposals is addressed separately as indicated at 1.3 and in relation to the Morton proposal as detailed in the report at Appendix B.

- **Morton scheme** – in a detailed report by Jones Lang LaSalle, ‘Review of Mr. Morton’s proposals for Walthamstow stadium - Briefing Note for GLA’, dated 4th April 2011. This provides a detailed analysis of the Morton scheme proposals including financial analysis and an assessment of the projects deliverability from a financial viability perspective.
- **L&Q scheme** – financial analysis is based on ongoing negotiations with the Council in respect of Section 106 contributions and viability inputs and assumptions as set out in an agreed Method statement for the Viability Assessment report.

5.2 Morton Scheme

The Morton scheme is based on a principle objective of reinstating greyhound racing at the Stadium. Housing development is proposed as it would provide financial support to their bid to buy the land.

The narrative that accompanies the Business Plan put forward by Mr Morton is based on two key propositions:

1. that the previous greyhound racing business was unsuccessful due to a number of poor management decisions taken by the previous owners;
2. that greyhound racing at Walthamstow should be an economically sustainable activity subject to:
 - diversification into non-greyhound racing income streams. It states for instance that “it is absolutely vital to the success of the business that it recognises the need for it to be far more than a greyhound stadium”¹; as well as
 - increased investment in promotion to stabilise and increase attendance numbers; and
 - increased investment in the stadium and facilities to boost average spend per head.

We have assessed the Morton scheme Business Plan across a range of factors which will directly impact the deliverability and, importantly, the economic viability of the proposals, namely:

¹ *Walthamstow Stadium Feasibility Study*, B & D Tax Services on behalf of Mr Morton, July 2010, P.7

- the performance of the Greyhound racing industry;
- status of other Greyhound stadia;
- financial analysis of the Morton Business Plan/ proposition;
- other practical issues affecting deliverability and sustainability of greyhound racing use.

The detailed analysis is contained in our report at Appendix B and we highlight the key features in 5.3 below.

5.3 Robustness of the Proposal

For the reasons outlined above in this report, we are concerned that the level and quality of information provided to support the proposal does not provide a comprehensive and robust assessment of the scheme. In particular, this relates to:

- compliance with Council policies;
- financial information concerning the Stadium business model and residual appraisal;
- fundability of the scheme;
- nature and acceptability of the housing/ housing environment; and
- operational business issues such as car parking for the Stadium and traffic congestion and parking impacts on local residents.

We regard these issues as fundamental to establishing the deliverability of the scheme.

5.4 Deliverability - Summary of Key Findings (Non-Financial) for Morton Proposal

Based on our detailed assessment of the Morton proposals, our summary of the key findings related to deliverability of the proposals is as follows:

- **Greyhound Racing Industry** - We are concerned that the resurrection of greyhound racing at Walthamstow Stadium may not be sustainable even after significant investment in the physical infrastructure. We are aware of other UK stadia that have been re-launched and subsequently failed and closed permanently. In particular, we would highlight the following:
 - **Industry decline** - The Morton Business Plan assumes 260,000 attendances per annum – 2,500 more than in 2007 (annual accounts). This ignores the general trend of decline at Walthamstow before closure and by the rest of the industry since. The Business Plan's profit is extremely sensitive to changes in attendance.
 - **Analysis of potential attendance at Walthamstow** - Extrapolation of the Stadium's previous trend of decline in attendance would suggest it would have fallen a further 18% to 213,000 per annum by end 2010. This pattern is in line with the decline in attendance at Greyhound Racing Association (GRA) events, which fell 10% from 2007-2009 (most recent accounts available) and less than the reported decrease at Ladbrokes owned stadia of 13% between 2008 and 2009.
 - **Reliance on traditional greyhound/gambling based income:** The Morton Business Plan's narrative stresses how "absolutely vital" it is to diversify revenue away from reliance on greyhound racing. However, of the projected revenue, 92% is generated from greyhound racing (44% of total revenue from gambling). Sponsorship, one income source cited as being central to their new approach accounts for only £150k (2.4%).
 - **Car Parking:** Since the previous external car park has been sold to Hackney Community Transport (HCT), the proposals for parking provision are unclear and apparently inadequate. This is a low PTAL rating location and significant numbers of visitors are likely to rely on car accessibility. There is a one-off

allowance of £50,000 that refers to HCT's site but this figure would seem very low to provide car parking commensurate with average attendances of at least 1,500 people per meeting.

- **Exclusions:** there does not appear to be any cost of funds/interest (for the proposed c.£8m purchase price for the site), nor any allowance for depreciation of the asset (GRA depreciate their equipment, plant, fittings and fixtures at 10% - 25% per annum).

Indicators of Greyhound Racing Industry Decline:

Attendance:	-19% (2004-2008) (Mintel/GBGB)
Number of meetings:	-9% (2004 - 2008) (Mintel/GBGB)
Registered racing greyhounds:	-21% (2004 - 2008) (Mintel/GBGB)
UK Stadium numbers:	-40% (2002 - 2009) (Mintel/GBGB)
GRA Profit:	-300% (2006-2009) a loss of £6m in 2009 (GRA Accounts)

- **Stadium Design & Operation** – Mr Morton highlights the Shelbourne Park stadium in Dublin as an example of a greyhound racing stadium that operates with a single stand (rather than two stands as the Walthamstow stadium previously operated). However, we would highlight a number of differences between the Walthamstow and Shelbourne Park stadia:

- Shelbourne Park is some 0.75 ha larger and situated in a more urban location than at Walthamstow and has stronger pedestrian connections to the city centre;
- Shelbourne Park has 3 frontages to the street, allowing easier access arrangements for race-goers and does not suffer from the restrictions imposed by having listed buildings at either end.
- Being a more urban location, Shelbourne Park is more accessible by public transport and therefore requires less car parking provision for residents.

We provide an annotated explanation of these and other points of difference using aerial images of Shelbourne Park at Appendix D of the report for the GLA (Appendix B to this report). We have also visited the Dublin stadium.

- **Enabling Housing Development** – as outlined in sections 2.1 and 3.2 of this report we conclude that the design proposals for the housing which is intended to provide enabling development for the stadium proposals fails to meet appropriate policy standards and that there is significant risk of the acceptability of the losing units to a Registered Provider (of affordable housing) or as alternative private for sale housing.

5.5 L&Q scheme

The L&Q scheme is driven by the rationale to deliver a substantial scheme of high quality housing with the maximum proportion of affordable housing in accordance with the remit of L&Q as a Registered Provider of housing.

We have assessed the L&Q proposals on a comparable basis, as far as is possible, other than in relation to the re-provision of the greyhound stadium, as follows:

- status and robustness of the L&Q proposal;
- project risks and deliverability.

5.5.1 Status and Robustness of the L&Q Proposal

L&Q's proposals have been developed based on thorough and robust analysis of the site and development opportunity consistent with the level of detail required to submit a full planning application.

Together these documents represent a full assessment of the site, location and development proposals and indicate a deliverable scheme.

5.5.2 Project Risks Deliverability

The status of the L&Q proposals is such that, subject to planning consent and completion of the Section 106 Agreement, L&Q are in a position to commence the development of the scheme. L&Q's programme for development, assuming full planning approval, is for commencement of the construction in late 2011 and completion in late 2013/early 2012, with first occupation of homes in 2012

6 Conclusions

6.1 Comparative Analysis of the Two Proposals

We outline below a summary of the key features of our comparative analysis of the Morton and L&Q scheme proposals.

Outputs: Key Features	Morton Proposals	L&Q Proposals
<ul style="list-style-type: none"> Housing Employment Section 106/Community benefits 	117 157 <ul style="list-style-type: none"> Reinstated Stadium Nightclub Sports pitches Affordable housing 	301 c.242 <ul style="list-style-type: none"> Multi-use Studios Crèche Gym Café Allotments Formal residential amenity; Affordable housing
Key Risks & Deliverability		
Planning	Scheme appears to be non-compliant across a number of important policy areas.	Scheme is compliant with planning policy.
Robustness of Proposals	In a number of key areas the information available in the Morton proposal is either deficient in coverage or indicates a lack of robustness in the proposition.	L&Q proposals are based on a thorough and detailed analysis of the site and development proposals. Accordingly the design is informed by a robust analysis across all necessary areas consistent with the requirements for a full planning application.
Delivery Track Record and Covenant Strength	We are unaware of any discussions between Mr Morton and either house-builders or Registered Providers (RPs). We would expect major RPs to have reservations about the feasibility of delivering the scheme as configured by Morton.	L&Q have a strong track record of housing delivery and have strength of balance sheet and access to funding sources that will assist delivery. Furthermore they have established relationships with their supply chain and their contracting arm to minimise delivery risks.
Viability	We have severe reservations about the viability of the Greyhound racing element of Mr Morton's Business Plan. Similarly, there are some large items of infrastructure required to develop the 117 units within the Morton scheme. Without cross subsidy from market housing, we would not expect the Affordable housing to be viable.	This is the subject of a separate report and ongoing discussions between the Council and L&Q.

6.2 Conclusions

Our key conclusions from our review of the available information concerning the scheme proposals for the Walthamstow Stadium site are detailed below.

6.2.1 Morton Scheme

There are a number of assumptions in the Morton Business Plan and financial assessment and appraisal of the opportunity which give rise to significant concern as to the viability and in particular economic sustainability of the business proposition. Key issues include:

- **Compliance with Council/ Other Policies** - We consider that there are a number of concerns as to the scheme's compliance with planning policy which represent significant risk to the viability of the project in its current form. In the event that changes were made to the Morton scheme to accommodate these concerns this could further adversely impact the financial viability of the scheme.
- **Business Plan & Greyhound Racing Industry** - The Morton Business Plan is based on increased levels of attendance from those in 2007 and revenue growth. However, the greyhound racing industry has been subject to a pattern of decline in recent years and indicators suggest that this pattern could continue.
- **Operation of the Stadium Business** - The previous racing operations relied on car parking provision on a proximate site owned by the Stadium business which has since been sold. The subject site is located in an area with a low PTAL rating and the proposals for a satisfactory car parking provision are not clear. The Business Plan does provide some limited financial resource to address this but we would anticipate a higher level of cost associated with this provision.
- **Financial Viability and Funding** –
 - Scheme financial viability which is detailed in the report at Appendix B.; and
 - There is no evidence of funding support for the proposals.

6.2.2 L&Q Scheme

The L&Q scheme is mixed use, but primarily a housing led development proposal including additional leisure and community facilities designed to address housing need within the Borough of Waltham Forest.

The proposals are the result of detailed and comprehensive analysis, design and technical evaluation to address the physical attributes of the site, technical matters, the local market for housing and the desire to provide leisure uses on the site for new and existing residents.

In contrast to the Morton scheme, we consider that the L&Q proposals:

- are compliant with planning policies (subject to ongoing discussions with the Council);
- will achieve a high quality of housing and environment with significant residential amenity and leisure facilities for new residents of the scheme and the existing local community;
- offer greater potential for employment and housing outputs; and
- are deliverable, subject to planning.

Appendix A: Planning Assessment Tables

Planning Assessment, May 2011

L+Q submission scheme – Conran & Partners

1. Consideration	2. L+Q Proposals	3. Urban Design Guidance	4. Informal Planning Guidance	5. Development Plan Policy	6. Emerging Planning Policy	7. Commentary	8. Policy Compliant?
1. Context: Site area	3.28ha	LB Waltham Forest Walthamstow Greyhound Stadium Urban Design Guidance (July 2009).	LB Waltham Forest Walthamstow Greyhound Stadium Informal Planning Guidance (September 2005), based on the 1996 UDP and the April 2003 First Review Second Deposit Draft UDP.	LB Waltham Forest Unitary Development Plan, March 2006 (UDP). Waltham Forest Urban Design Supplementary Planning Document, February 2010 (SPD) GLA London Plan, February 2008 (LP).	LB Waltham Forest Core Strategy Submission Document, January 2011 (CS). LB Waltham Forest Development Management Policies Preferred Options Document, January 2011 (DM). GLA Draft Replacement London Plan, October 2009 (DLP).	The CS indicates Walthamstow Stadium as a key site where high quality development is encouraged (CS 1). The Council's 2009 Urban Design Guidance sets out a possible design solution for the site. The 2005 Informal Planning Guidance is now superseded and it has been analysed for general reference only.	N/A
2. Context: Flood plain	The south-west side of the site is within the 'extent of extreme flood' (Zone 2, medium probability). The south side of the site is within an area subject to 'flooding from rivers or sea without defence' (Zone 3a, high probability).	No comments provided	The River Ching is at risk of flooding. In case of redevelopment of the site, the river will have to be protected.	Proposals should not result in an unacceptable increase in the risk of flooding to people, property and essential service provision (UDP WPM18). Development proposals in flood zones should be assessed against risk of flooding in line with PPS25 (LP 4A.12)	Proposals should be designed to minimise the potential for flooding. Where necessary, Sequential and Exception Test and Flood Risk Assessment should be undertaken in accordance to PPS5 (CS 5). Sustainable Urban Drainage Systems should be implemented where possible. All drainage systems to be accompanied by a management plan (DM 35), Flood Risk Assessments should be submitted where required by PPS5. The Council will direct development away from Flood Zones 2 and 3, particularly for vulnerable uses (DM paragraphs 36.9 and 36.10). Development proposals should comply with the requirements of PPS25 (DLP 5.12).	A Flood Risk Assessment has been produced to support the redevelopment of the site. A Sequential Test demonstrates that there are no other reasonably available sites at a lower risk of flooding. An Exception Test might be required for the development within Flood Risk Zone 3a. The proposal includes a generous provision of soft landscaping that will mitigate surface water run-off. The integration of the River Ching within the development will contribute to the mitigation of flood risk.	Yes, but Exception Test might be required

1. Consideration	2. L+Q Proposals	3. Urban Design Guidance	4. Informal Planning Guidance	5. Development Plan Policy	6. Emerging Planning Policy	7. Commentary	8. Policy Compliant?
3. Context: Archaeological priority zone	The south side of the site is within an area identified as 'archaeological priority zone'.	The archaeological priority zone may impact on construction works.	The site is within an archaeological priority zone.	The archaeological heritage of the Borough should be protected (UDP BHE17 and LP 4B.15).	The significance of archaeological priority zones should be preserved and enhanced (CS 12 and DM 29). Development proposals should protect the local archaeological heritage (DLP 7.8).	A Desk Archaeological Study indicates that the redevelopment of the study site is unlikely to have a significant or widespread archaeological impact.	Yes
4. Context: Existing buildings	Tote building retained for a mix of private and community uses (mix to be defined). Kennels retained as community stores/meeting rooms to support the proposed allotment area. Grandstands demolished.	The document lists: Tote building at frontage (Grade II listed building from May 2007). Kennels at eastern end (Grade II listed building from May 2007). Grandstands. Race track. Central open space.	Tote building at frontage (locally listed building at the time) and associated structures to be protected.	The retention, maintenance and repair of listed buildings will be supported. The setting of listed building should be maintained and enhanced. (UDP BHE14 and LP 4.B12).	The Borough's built heritage assets should be maintained and enhanced (CS 12 and DM 29). The Council will support the maintenance and repair of listed buildings. Proposed uses, alterations and extensions should take into account the significance of the asset (DM 29). Proposals should preserve, refurbish and incorporate heritage assets (DLP 7.8).	Retention of important designated heritage assets. The re-use of the listed buildings for community related facilities is considered appropriate. The proposed uses and the adaptation necessary will not impact negatively on the preservation of the fabric of the buildings. The proposal protects the setting of the Tote building and enhances the views to and between the two listed buildings.	Yes
5. Context: Mix of uses	Housing. Community sports centre within the Tote building and the building that currently forms the West Stand (sport studios, gym, crèche, changing rooms, reception, juice bar, café, social area with community activity equipment). Private and public open space. Allotments. Public play areas.	Possibility of retaining the racing ground, either on its own or as part of a mixed-use development. Racing ground to become a public open space. Housing mix to be agreed with the Council and to incorporate a high proportion of family units. Community uses. Leisure facilities. Potential uses for entrance building are community space, arts, college, retail, sport and leisure.	N/A but the guidance assumes the stadium to be retained and encourages the presence of different users at different times of the day.	Leisure uses ordinarily would be subject to PPS4 tests (sequential approach) recognizing the planning value of the existing use. Mixed uses are encouraged. Single uses should be avoided on major sites unless it can be demonstrated that they would not detract from the vitality and vibrancy of the area, or that alternative uses are not viable (Urban Design SPD). Developments should provide for or enhance mix of uses, where appropriate (LP 4.B1).	Mixed use developments are encouraged where appropriate, especially on key sites such as Walthamstow Stadium. In these areas high quality development is encouraged, and appropriate uses include housing, employment, leisure and community uses (CS 1 and DM 1). The Council encourages, where appropriate, the provision of residential units in mixed-use developments (CS 2). Mix of uses should improve people's access to community	The provision of community and sport uses, allotments, play areas and open space for public use is a very positive feature of the development. It is proposed that the facility will be managed under the auspices of a Sports Trust with Board level representation from the applicant as well as local organisations. The presence of restaurant/cafes privately run would contribute to the vitality of the development and encourage visitors at different times of the day.	Yes

1. Consideration	2. L+Q Proposals	3. Urban Design Guidance	4. Informal Planning Guidance	5. Development Plan Policy	6. Emerging Planning Policy	7. Commentary	8. Policy Compliant?
					infrastructure, green spaces, commercial services and public transport (DLP 7.1).		
6. Context: Proposals (units and habitable rooms)	301 units 1,067	N/A	N/A	N/A	N/A	N/A	N/A
7. Analysis: Residential tenure (market and affordable)	<ul style="list-style-type: none"> 65% to be market housing 35% to be affordable housing of which: <ul style="list-style-type: none"> 50% to be affordable rent 50% to be intermediate 	N/A	N/A	<p>Indicative target for affordable housing is 40% for schemes of 0.5 hectares and above or of 15 units or greater. The balance between social and intermediate housing should be 70:30. (UDP HSG6)</p> <p>50% of housing provision within new developments providing 10 or more homes to be affordable, with a 70:30 split between social and intermediate units (LP 3A.9).</p>	<p>Indicative target for affordable housing is 50% for schemes of 10 or more homes (CS 2 and DM 3).</p> <p>The balance between social and intermediate housing should be 60:40 (CS 2).</p> <p>A provision lower than 50% should be justified by an 'open book' financial assessment. The shortfall will be treated as a deferred contribution (DM 3).</p> <p>The Council states that 'while some sites may not be appropriate for family housing, this should not preclude the provision of larger homes being affordable' (DM paragraph 4.9).</p> <p>Boroughs should set out affordable housing targets in consultation with the Mayor (DLP 3.8).</p>	The proposal at 35% affordable housing represents a good offer in today's economic climate especially given the heritage and mixed use benefits. A financial assessment would normally be required given that the provision is less than 50%.	Yes
8. Analysis: Density	329.3 hr/ha	<p>Suburban location: 200/250 hr/ha</p> <p>Higher density may be permitted subject to design.</p>	N/A	<p>Suburban location: 200/250 hr/ha (UDP PSC4)</p> <p>The UDP (paragraph 10.12) defines habitable room as a room within a dwelling the primary use of which is living, sleeping, or dining, and includes kitchens larger than 13 sqm.</p>	<p>The Council will seek to optimise densities in appropriate locations (CS paragraph 5.10).</p> <p>Housing densities should refer to the London Plan density matrix (DM 8).</p> <p>Suburban location: 150/250</p>	<p>All policies encourage development proposals that respect the local context.</p> <p>The proposed density exceeds the policy guidance, but this is justified through design.</p> <p>The site has a PTAL score of 3.</p>	Yes

1. Consideration	2. L+Q Proposals	3. Urban Design Guidance	4. Informal Planning Guidance	5. Development Plan Policy	6. Emerging Planning Policy	7. Commentary	8. Policy Compliant?
				Suburban location: 150/250 hr/ha (LP)	hr/ha (DLP) Development should have regard to the form, structure and function of an area (DLP 7.4).		
9. Analysis: Residential mix (total)	Total 301 units: <ul style="list-style-type: none"> • 30 x 1 bed (10%) • 188 x 2 bed (62%) • 46 x 3 bed (15%) • 36 x 4 bed (12%) 	A high proportion of family housing is required.	N/A	Mix of sizes and types is encouraged (UDP HSG9 and LP 3A.5).	<p>The Council will seek to provide more larger units, three bedrooms or more (CS paragraph 5.23).</p> <p>A range of dwelling sizes and tenures should be provided. The preferred dwelling mix for all housing developments is: 10% 1 bed, 40% 2 bed, 40% 3 bed and 10% 4 bed (DM 5).</p> <p>Development should have regard to the form, structure and function of an area (DLP 7.4).</p>	<p>The mix provides 27% 3 and 4 bed units and very few 1 bed units. It is a good mix of units and a good range of sizes. Although it does not match perfectly the Council's preferred mix in the emerging policies, the scheme adopts a positive approach given the constraints of the site.</p> <p>Three and two storey terraced houses are proposed to the north of the site, responding to the character of the surrounding context (two storey terraced dwellings).</p>	Yes
10. Analysis: Residential mix (unit sizes)	Please refer to the accommodation schedule in the Design and Access Statement.	N/A	N/A	<p>From Urban Design SPG.</p> <p>1 person = 37sqm 2 persons = 44sqm 3 persons = 57sqm 4 persons = 67sqm 5 persons = 81sqm 6 persons = 92 sqm</p> <p>Mix of sizes and types is encouraged (LP 3A.5).</p>	<p>Not mentioned in the CS.</p> <p>The standards comprised in DM 7 replicate what set out at Table 3.3 of DLP.</p> <p>Table 3.3 of DLP sets out minimum flat areas: 1 bed flat (2 persons) – 50sqm 2 bed flat (4 persons) – 70 sqm 3 bed flat (4 persons) – 70 sqm</p>	The accommodation schedule shows that only a small number of units will not comply with GLA standards, due to the site's constraints and the challenge of accommodating all the required uses in this area.	Yes
11. Analysis: Residential mix (room sizes)	Please refer to the accommodation schedule in the Design and Access Statement.	Room sizes to exceed the UDP minimum guidance.	N/A	<p>From Urban Design SPG.</p> <p>Cooking, eating and living = 22sqm Single bedroom = 7sqm Double/twin bedroom = 12sqm</p> <p>Not mentioned in the LP.</p>	<p>Not mentioned in the CS or DLP.</p> <p>DM 7 sets out: <ul style="list-style-type: none"> • Single bedroom - 8 sqm (minimum) • Double or twin bedroom - 12 sqm (minimum) • Floor area of living, dining </p>	The accommodation schedule shows that only a small number of rooms will not comply with GLA standards, due to the site's constraints and the challenge of accommodating all the required uses in this area.	Yes

1. Consideration	2. L+Q Proposals	3. Urban Design Guidance	4. Informal Planning Guidance	5. Development Plan Policy	6. Emerging Planning Policy	7. Commentary	8. Policy Compliant?
					and kitchen spaces: <ul style="list-style-type: none"> • 2 persons – 23 sqm • 3 persons – 25 sqm • 4 persons – 27 sqm • 5 persons – 29 sqm • 6 persons – 31 sqm 		
12. Analysis: Lifetime Homes and wheelchair accessible housing	10% of units to be wheelchair accessible. All units to be Lifetime Homes compliant.	N/A	N/A	All new homes should be built to Lifetime Homes standards and 10% should be wheelchair accessible (UDP HSG10 and LP 3A.5).	All new homes should be built to Lifetime Homes standards and 10% should be wheelchair accessible (CS paragraph 5.31, DM 8 and DLP 3.8).	The proposal is in line with planning policy requirements.	Yes
13. Analysis: Design	Current main entrance is retained. Views of Toteboard and visibility of listed buildings within the site is retained and improved. Residential buildings are designed to be urban blocks with active frontages. A generous open space provision will serve the residents as well as visitors. Vehicular routes complement the horizontal character of the design.	Current main entrance to be retained. Removal of 1980s metal work from entrance building to be considered. Extension to listed kennels can be considered. The buildings to the north and south of site are expected to be closed urban blocks with active frontages on the central open space and the existing pathway to the south. Views of Toteboard and visibility of listed buildings within the site to be retained.	Design to: <ul style="list-style-type: none"> • Respond to the context, including character of adjacent buildings • Respect setting of listed buildings • Encourage natural surveillance • Create active frontages 	Proposals should be of high design standards. They should be compatible with and enhance the local context (UDP BHE1, LP 4B.1 and LP 4B.8). Proposals for sites over 0.25ha should be accompanied by an Urban Design Statement (UDP BHE2).	Proposals should be of high design standards. They should respond positively to the local context and character (CS 15, DM 8 and DLP 7.6). New developments should promote distinctiveness and sense of place (CS 15). Proposals should take into account the physical context of the site and its surroundings, local character, built form, scale and massing, materials and landscaping (DM 8 and DM 30). The Council encourages the provision of a coherent layout and block structure with active street frontages fronting the public realm (DM 30). The Council will apply the Building for Life Criteria in promoting high design standards (CS paragraph 18.15). Development should have regard to the form, structure and	Three and two storey terraced houses are proposed to the north of the site, responding to the character of the surrounding context (two storey terraced dwellings). Improved visibility of the listed building and preservation of their setting. Active frontages on main street and open space Integration of public and private open space in the development, including pedestrian and cycle links The proposed residential blocks maintain an appropriate distance from the neighbouring properties.	Yes

1. Consideration	2. L+Q Proposals	3. Urban Design Guidance	4. Informal Planning Guidance	5. Development Plan Policy	6. Emerging Planning Policy	7. Commentary	8. Policy Compliant?
					function of an area (DLP 7.4).		
14. Analysis: Height	<p>North buildings – ranging from 3 to 4 storeys (top storey set back).</p> <p>Central blocks – 5 storeys</p> <p>South buildings – ranging from 4 to 8 to the south-east corner of the site.</p>	<p>Increased height towards the eastern end of the site.</p> <p>Height towards the west end of the site should be low to respect setting of listed building.</p>	N/A	Proposals should be compatible with and enhance the local context (UDP BHE1, LP 4B.1 and LP 4B.8).	<p>Scale and height of development proposals should take into account their impact on the local context (CS 15).</p> <p>Proposals should respond to the local context in terms of scale, height, and massing (DM 31).</p> <p>Development should have regard to the form, structure and function of an area (DLP 7.4).</p>	<p>Three / four storey terraced houses, with top storey set back, are proposed to the north and north-east corner of the site, responding to the character of the surrounding context (terraced dwellings).</p> <p>The 4 storey central blocks to the south-west corner of the site are characterised by a set back top storey, which mitigate the visual impact on the neighbouring properties.</p> <p>The blocks at the either entrances of the site provide an attractive visual setting, although the northern block may raise issues of overlooking on the neighbouring residential units to the north.</p> <p>The 8 storey high building to the south-west corner is considered appropriate in this location.</p>	Yes
15. Analysis: Car parking	<p>The car parking spaces will include:</p> <ul style="list-style-type: none"> • 211 for residential units (on-street and off-street -covered parking area) • 7 residential visitors spaces south of the Tote car park • 8 spaces for the nursery along the northern access road • 51 spaces for the sport studio facility (of which 41 in the Tote building) • 2 car club bays 	<p>On-street parking encouraged, to be used 'for the area'.</p> <p>Presumption against underground parking.</p> <p>Car pool facilities to be explored.</p>	Car parking to be a coherent part of the design.	<p>UDP maximum standards</p> <p>1/2 bed flats = 1 – 1.25 spaces per unit</p> <p>3/4 bed flats = 1.5 – 1.75 spaces per unit</p> <p>Sports Stadia:</p> <ul style="list-style-type: none"> • For facilities with more than 1500 seats: 1 space per 15 seats (plus ample provision for coach parking, separate from car parking) • No parking required for smaller facilities <p>Public houses, wine bars,</p>	<p>Parking provision should be in accordance with the standards set out in the Development Management DPD (CS 8).</p> <p>The Council encourages a design-led approach to car parking (DM 31).</p> <p>DM maximum standards (outside controlled parking zone), as required by DM 17.</p> <p>Residential</p> <p>4/3 bed – 1.2 spaces per unit</p> <p>1/2 bed – 1 space per unit</p>	<p>The proposed residential and non-residential car parking is policy compliant. Taking into account the low PTAL score of the site, the Council could also accept a higher parking provision, up to 316 spaces.</p>	Yes

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				<p>restaurants & cafes = 1 space per 10 seats</p> <p>LP maximum standards</p> <p>Residential</p> <p>4+ bed – 1/1.5 spaces per unit</p> <p>3 bed – 1.5/1 space per unit</p> <p>1-2 bed – 1 to less than 1 per unit</p> <p>Leisure and other uses – to reflect public transport, pedestrian and cycle accessibility.</p>	<p>Disabled parking – 1 space per wheelchair unit</p> <p>Class A2 and B1 uses – 1 space per 500 sqm</p> <p>Class A1 uses –</p> <ul style="list-style-type: none"> • Smaller food store (up to 500m2 GFA) - 1 space per 150m2 • Food supermarket (up to 2,500m2 RFA/4000m2 GFA) – 1 space per 75m2 • Food superstore (over 2,500m2 RFA/4000m2 GFA) – 1 space per 50m2 <p>Hotels - 1 space per 15 beds, depending on PTAL (plus 1 coach parking space per 50 guest bedrooms. Allowance should be made for taxi drop offs).</p> <p>Public houses, wine bars, restaurants, cafes - 1 space per 10 seats maximum outside town centres</p> <p>Take aways – depending on location, hours of operation and public transport accessibility</p> <p>Leisure centres –</p> <ul style="list-style-type: none"> • Less than 1,000 sqm – no parking required • More than 1,000 sqm – 1 space per 100 sqm <p>Sports stadia –</p> <p>Less than 1,500 seats – no parking required</p> <p>More than 1,500 seats – 1 space per 20 seats and provision for</p>		

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					coach parking Disabled parking - 5% of spaces (1 minimum) DLP maximum standards Residential 4+ bed – 2/1.5 spaces per unit 3 bed – 1.5/1 space per unit 1-2 bed – Less than 1 per unit		
16. Analysis: Cycle parking	Cycle parking to be provided in accordance to TfL standards, in the entrance core of the residential blocks and within the curtilage of the houses/maisonettes. Additional Sheffield bike stands will be provided for visitors.	Cycle storage facilities to be explored.	N/A	UDP standards Residential - 1 space per flat Restaurants & Cafes - 1 space per 20 seats with a minimum of 2 spaces Pubs/Wine Bars - 1 space per 100 sqm with a minimum of 2 spaces Leisure/sport centres - 1 space per 10 staff plus 1 space per 20 peak period visitors	Parking provision should be in accordance with the standards set out in the Development Management DPD (CS 8). Housing developments should be provided with an appropriate and safe cycle parking (DM 8 and DM 15). DLP standards (TfL standards): Residential – 1 space per 1 or 2 bed units and 2 per 3 or more bed units Restaurants & Cafes - 1 space per 20 staff and 1 per 20 seats Pubs/ Wine Bars – 1 space per 100sqm Leisure facilities – 1 space per 10 staff and 1 per 20 peak period visitors	The cycle parking proposal is policy compliant in principle. The number of Sheffield bike stands will have to be assessed with the Council.	Yes
17. Analysis: Open space	Soft landscaping: 3,461 sqm Hard landscaping: 2,745 sqm Total: 6,206 sqm	The racing ground (without following the historic shape precisely) could be turned into public open space.	N/A	Where appropriate, open space should be delivered as part of major residential developments (UDP ENV16). Councils should consider the need of open space areas when	The Council encourages the provision of new open space, play and recreational spaces, and outdoor sport facilities (CS 6). New usable open spaces and	It is considered that the provision of public open space meets the needs of the development.	Yes

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				assessing development proposals (LP paragraph 3.33).	landscaping must be provided where appropriate, on-site or through planning contributions (DM 13). Development proposals should incorporate appropriate elements of open space (DLP 2.18).		
18. Analysis: Residential amenity	On average, the scheme comprises 28sqm of amenity space per dwelling. The residential units will benefit from: <ul style="list-style-type: none"> • A private communal area • Rear and front gardens • Balconies • Roof terraces 	N/A	Amenity space to be a coherent part of the design.	Proposals should not harm the visual amenity of neighbouring properties (UDP BHE3). Private amenity space should not be overlooked. Balconies should be a minimum width of 1.5m and an overall minimum size of 5sqm (Urban Design SPG). Developments should respect the local context (LP 4B.1).	Housing development should comprise adequate levels and usability of external spaces, particularly at higher densities (CS paragraph 5.29). New dwellings should comprise 15 sqm per habitable room of private amenity space. Larger homes should include a rear garden (DM 7). Proposals should not impact negatively on the amenity of neighbouring residents (DM 33). Development proposals should not harm the amenity of surrounding buildings (DLP 7.6).	The residential amenity measurements are based on each unit rather than on habitable rooms. The proposal is considered appropriate given the housing range, mix and type proposed.	Yes
19. Analysis: Play areas	The proposal comprises: <ul style="list-style-type: none"> • Doorstep playable space for under 5s – one private area and two publicly accessible areas • Local play space for 5 to 11s – two publicly accessible areas • Youth space for 12+ - included in the hard landscaped area between the Tote building community facilities and the crèche. 	N/A	N/A	Provision of play areas is encouraged. The Council can secure play areas through planning obligations attached to major developments (UDP ENV17). A minimum of 10sqm per child bedspace should be provided, equipped when possible (Urban Design SPD). No standards are set out in the LP. A benchmark standard of a minimum of 10 sq m per child should be applied to establish the	The Council encourages the provision of new open space, play and recreational spaces, and outdoor sport facilities (CS 6). Where appropriate, development proposals should provide exercise and recreational facilities either on or off site, together with maintenance plans (DM 13). No standards are set out in the DLP.	The provision of play area has been calculated to meet the SPD requirements.	Yes

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				quantitative requirements for play space provision arising from new developments (GLA Play Area SPG, 2008).			
20. Analysis: Water for amenity purposes	The River Ching will be integrated with the development.	Opportunity of integrating the River Ching within the development or including water in the central open space.	N/A	Water for amenity purposes is not mentioned in the UDP or LP, but it would contribute to the overall sustainability of the proposal.	Water for amenity purposes is not mentioned in the CS, DM or DLP, but it would contribute to the overall sustainability of the proposal.	The River will contribute to the amenity and ecological value of the proposal.	Yes
21. Analysis: Community, sport and leisure facilities	The Tote building and the building that currently forms the West Stand will accommodate a community sports centre to include: <ul style="list-style-type: none"> • Sport studios • Gym • Changing rooms • Crèche • Reception • Juice bar • Social area with community activity equipment 	Community uses are required as part of the site redevelopment.	N/A	<p>Mixed-use schemes should consider the provision of community facilities (UDP2).</p> <p>The provision of community facilities in the suburbs is supported (LP 2A.9).</p> <p>Councils should ensure that there is a sufficient provision of community, sport and leisure facilities to meet the needs of the local community (LP 3A.18).</p> <p>When considering proposals for sport facilities, the sequential approach should be applied (LP3D.6).</p>	<p>New developments should contribute to the provision of social infrastructure, such as community, sport and leisure facilities, either on-site or through planning contributions (CS 4).</p> <p>There is an acknowledged deficit of indoor sport halls in the Borough (CS paragraph 7.14).</p> <p>The Council encourages the provision of new open space, play and recreational spaces, and outdoor sport facilities (CS 6).</p> <p>Where appropriate, development proposals should provide exercise and recreational facilities either on or off site, together with maintenance plans (DM 13).</p> <p>Development schemes that result in any unmet additional need for social infrastructure to contribute towards supporting existing facilities or providing for new facilities (DM 18).</p> <p>It is important to have a range of readily accessible community facilities (DLP paragraph 1.42)</p>	<p>The proposed community and sport uses will benefit local residents and members of the wider community alike.</p> <p>The applicant has prepared a 'Sport and Business Case to support the loss of Walthamstow Stadium as a greyhound racing and general sporting and leisure venue', that confirms that the new community sports facility will serve a wider spectrum of the local population than the stadium facility during its the last few years.</p> <p>The study also indicates that the proposed community hub can be delivered as part of the S106 contributions.</p>	Yes

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					<p>as the provision of indoor facilities is limited across London (DLP paragraph 3.104).</p> <p>The provision of leisure facilities would be subject to guidance comprised in PPS4 (DM 27).</p> <p>The provision of leisure facilities is encouraged subject to the sequential approach (DLP 4.6).</p>		
22. Analysis: Sustainability	<p>All residential units will meet the 2010 Code for Sustainable Homes Level 4.</p> <p>The development will be designed and constructed to meet the draft 2009 London Plan Policy 5.2.</p> <p>A Gas Fired CHP will serve all dwellings and the nondomestic buildings.</p> <p>Green areas and River Ching will mitigate flood risk and surface water run-off.</p>	<p>Explore the feasibility of a CHP system for the site.</p> <p>A minimum of silver standards against CABE's Building for Life Assessment.</p> <p>Measures to minimise energy use of the site to be included.</p>	<p>10% of predicted energy consumption to be from renewable sources.</p> <p>Principles of energy conservation and sustainability to be adopted throughout the development.</p>	<p>All new residential, commercial and industrial development should be energy efficient (UDP WPM20).</p> <p>Housing development of 10 or more units should generate 10% of the total predicted energy consumption from renewable energy sources located on site (UDP WPM21).</p> <p>Proposals should contribute to and mitigate the effects of climate change (LP 4B.1).</p> <p>Assessment of energy demand and carbon dioxide emissions, including feasibility of CHP/CCHP and community heating systems, is required (LP 4.A6).</p> <p>20% of energy provision from renewable energy sources (LP 4A.7).</p>	<p>New developments should be energy efficient, minimise carbon emissions, and meet high environmental standards based on BREEAM and Code for Sustainable Homes targets (CS 5 and DM 11).</p> <p>Major developments should seek to reduce carbon emissions through the use of renewable energy generation, particularly CHP (CS paragraph 8.22 and DM 12).</p> <p>When major developments cannot connect to an existing decentralised energy network or implement a new one, connection to future networks should be incorporated and a contribution towards the installation of an area wide decentralised energy network or other carbon reduction measures would be required where appropriate (DM 12).</p> <p>Applications for new development to comprise an Energy Assessment. If the required carbon reduction cannot be achieved, financial</p>	<p>The Energy Report that accompanies the application reviews the energy reduction elements of the Code for Sustainable Homes. All other areas of the code need to be confirmed once the design progresses to ensure code level compliance.</p> <p>With further design details, it will also be possible to assess options for renewable energy generation.</p> <p>The Council might require the production of a Code for Sustainable Homes and BREEAM Pre-Assessment.</p>	Yes, subject to further studies

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					<p>contribution should be given to a carbon offset fund (DM 11).</p> <p>Major development proposals to achieve a minimum of Code for Sustainable Homes 4 and/or BREEAM excellent (DM 11).</p> <p>Improvement on 2006 Building Regulations (DLP 5.2):</p> <ul style="list-style-type: none"> • Residential 2010-2013 – 44% 2013-2016 – 55% 2016-2031 – Zero Carbon • Non domestic 2010-2013 – 44% 2013-2016 – 55% 2016-2019 – as per Building Reg 2019-2031 – Zero Carbon <p>An Energy Assessment has to accompany planning applications (DLP 5.2).</p> <p>Development proposals should meet the highest standards of sustainable design (DLP 5.3).</p>		
23. Analysis: Connectivity / Vehicular access	<p>The main vehicular access to the development reuses the existing access on Chingford Road at the north end of the site frontage.</p> <p>A secondary vehicular access is provided at the southern end of the Chingford Road site frontage.</p>	<p>Principal access to the site is immediately adjacent to a busy, signalised junction and will be subject to negotiation with the Council's highways engineers.</p> <p>Several secondary access points exist connecting the stadium with Rushcroft Road but these have not been used for active connections and would not be suitable for vehicular access.</p> <p>Retain the main entrance route as principal access point but review the detail of its continued use as a vehicle access with the Borough's</p>	<p>Any highway works along Chingford Road will require TfL approval.</p> <p>Given the site's proximity to the Billet roundabout and the A406, there are likely to be challenging highways issues to resolve to prevent a build-up of traffic tailing back to the Billet. This will need to be considered by TfL Network Assurance.</p>	<p>Developments should be accessible, usable and permeable for all users (LP 4B.1).</p>	<p>Ensure development is properly integrated with the transport network by, inter alia, requiring sufficient integration of new development with existing transport networks and by creating good connections to existing neighbourhoods (Draft Policy DM14).</p>	<p>The Transport Statement indicates that the proposed access to the site will not have a significant impact on the highway network.</p> <p>The proposals for vehicular access will need to be discussed with TfL and the Highways Authority.</p> <p>Council unlikely to support residential vehicular access off Rushcroft Road.</p>	Yes

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		highway engineers as part of any development proposal.					
24. Analysis: Connectivity / Pedestrian environment	<p>The development comprises:</p> <ul style="list-style-type: none"> • Pedestrian friendly tree-lined streets • Pedestrian and cycle links to the north, south and east of the site 	<p>Pedestrian and cycle permeability has to be delivered between the site and the residential developments to the north and south of the site.</p> <p>Link between proposed central open space and existing open space to the south east to be explored.</p>	<p>The site should be connected with paths and roads outside the area to ensure that the development is accessible and permeable.</p>	<p>Walking as a recreational activity is supported. Planning obligations could be sought to create new footpaths and walkways to and through open spaces and places of interest (UDP ENV19).</p> <p>Developments should be accessible, usable and permeable for all users (LP 4B.1).</p>	<p>Walking and cycling is actively encouraged through the provision of an attractive public realm and safe and accessible routes (CS 8).</p> <p>The creation of new distinctive and legible areas and spaces is encouraged (CS 15).</p> <p>Accessible, safe and well designed walking and cycle routes should be provided as part of new developments (DM 15).</p> <p>High quality pedestrian and street environment are encouraged (DLP 6.10).</p> <p>Cycling and walking are supported as modes of transport in outer London (DLP 2.8).</p>	<p>The proposed tree-lined streets and the pedestrian and cycle links to the north, south and east of the site, will create a much needed pedestrian/cycle friendly environment, providing the permeability between Walthamstow Stadium and the local area advocated in the Urban Design Guidance.</p>	Yes

Appendix B: Report to the GLA



Real value in a changing world

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