



Transport for London Commercial Development – Written Statement on Main Matter 5: The environment, climate change, flood risk, pollution and waste management

Recently TfL has set up a dedicated commercial property company, Transport Trading Limited Properties Limited (TTLP), to deliver housing in high demand areas and provide an increased revenue stream, and also to manage its commercial estate and undertake other development projects. Although TTLP will be driving development forward for TfL in Waltham Forest and elsewhere in London, we submit our responses in the name of TfL CD in order to be consistent with our previous representations, our SoCG with the Council and to avoid confusion. TfL CD can be considered interchangeable with TTLP for the purposes of our responses to the Inspectors' matters.

5.2 Have all reasonably available options in Flood Zones 1 and 2 been exhausted before the suitability of sites in Flood Zone 3 has been considered?

TTLP disagree that all reasonably available options within Flood Zones 1 and 2 have been exhausted, as multiple sites have previously been promoted by TTLP through various previous consultations as potential development sites which are located within Flood Zone 1.

The following TfL landholdings remain unallocated despite being promoted, and these are all within Flood Zone 1:

- Highams Park Station Car Park
- Leytonstone Station
- 67 – 73 Guildford Road
- Land at Whipps Cross
- Chingford Station Car park

In the Consultation Reports there do not appear to be any mention of, or response to, our promotion of these sites. The above sites do not appear to have been assessed in the Sustainability Appraisal and only Highams Park Station Car Park has been included in the Brownfield Land Register.

In addition, Chingford Station Car Park and bus terminal was included as a site allocation in the 2020 draft Local Plan site allocation consultation, however, this was subsequently removed. The Habitats Regulations Assessment Report (November 2021) noted that this site has been removed because the developable area was deemed to be too small for the site to be allocated. The policy team also clarified that on closer review of the site boundary there is very little of the site that does not fall within TfL's operational usage. It was clarified through our Regulation 19 response that development on the site would likely involve retention of operational uses on the ground floor with residential above. This type of co-location is something that we are doing on a number of operational sites across London



using high quality and sensitive design. As such, the site allocation for this site should be reinstated.

TTLP also consider that the site capacity at Walthamstow Central Bus Station should be increased from 200 units, and that 300 units would be more appropriate, with the reasoning for this set out in more detail in our Regulation 19 response, so we will not repeat it here. This would again assist in reducing the need to develop on Flood Zone 3, as well as achieving other key policy objectives such as focusing density in sustainable locations.

Yours sincerely,

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Name, Title, Organisation