

The Magistrates, 1 Farnan Road E17 4NX

Case Officer: Elisabeth Glover

Ref: 192596

Email: Dmconsultations@walthamforest.gov.uk

Date: 5<sup>th</sup> February 2020

By email only

Dear Resident,

**RE: Clementina/ Lea Bridge Gasworks, Perth Road**

Since I last wrote to you on 13<sup>th</sup> January 2020, we have received several further enquiries from residents including yourself. We have grouped these questions and answers as set out below.

- 1. Cumulative Impact:** *Has the council arranged for an impact report on the total development of the area rather than accepting piecemeal impact reports on each individual development?*
- 2. If not, why not?*

The planning application will be supported by an Environmental Statement. This will need to consider the impact of the Lea Bridge Gasworks development itself, but also the cumulative impact of the scheme any other proposed developments in the vicinity.

This will only look at proposals that are in the planning application pipeline.

However, the Council is currently preparing a new Local Plan (LP) and a Site Allocations Development Plan Document (SADPD). These documents identify potential sites for development in the Lea Bridge Area. The LP and the SADPD will provide a broad framework for sites to come forward comprehensively. We are currently considering whether a Masterplan or similar supplementary planning document is required for this area. Formal consultation on both the LP and the SADPD will take place in the summer.

Nevertheless, whilst there is no adopted strategy which underpins development in the whole area, the site is included within the designated Blackhorse Lane Housing Zone and sits within the Upper Lea Valley Opportunity Area Planning Framework.

Work has commenced on the SIL masterplan and draft local plan site allocations which will be consulted upon in due course.

- 2. Height:** *London Plan Policy D9 Tall Buildings states "Where the edges of the site are adjacent to buildings of significantly lower height or parks and other open spaces there should be an appropriate transition in scale between the tall building and its surrounding context to protect amenity or privacy."*

This is one part of an extensive policy which the development is required to address sufficiently in order to be acceptable, as such it would not be appropriate to focus on one part of the policy out of context. However, in my opinion, the positioning of the two tallest elements here defines the edge of the park, fosters placemaking and acts as a wayfinding tool to the linear park and new entrance to Jubilee Park directly from Clementina Road. The current design shows a sensitive relationship where the new development meets the existing two storey houses and the transition from the domestic scale of properties in Clementina and Perth Road.

**3. Amount of Development:** *Although in strict legal terms there is no 'right to a view', this does not mean it shouldn't be a consideration when planning. The 'view' or general landscape can define an area both in terms of public perception and that of residents, thus having a wider impact on the neighbourhood. I would like to point out that the Looming Motion Towers (Lea Bridge Road junction with Orient Way) have already drastically changed the landscape. If further developments are allowed to build to similar heights, windy and unpleasant 'micro climates' will be created – not exactly conducive to encouraging cycling or indeed walking as promoted by the Enjoy Waltham Forest Programme. What exactly is meant by a 'high quality' scheme?*

A "right to a view" is not normally a material planning consideration. However, the visual impact of a development on the townscape, character of an area and longer views are things which we do take into account in the consideration of a planning application. The Gas Works planning application will be accompanied by a Townscape and Visual Impact Assessment which will allow the case officer (and others) to assess the impact of the development within its surrounding context. This will also include an analysis of the cumulative impact of schemes, such as those planned or recently approved and under construction. The proposal will be accompanied by a wind and micro climate assessment to ensure that an acceptable level of amenity is maintained with respect to sitting out and pedestrian movement. Quality is to some extent a subjective matter, however the Planning and Design Teams at LBWF are well qualified and experienced and will be able to assess the design development, architecture and choice of materials to ensure a high quality scheme is delivered in accordance with planning policy. The scheme has been subject to a review by the Waltham Forest Design Panel. The eventual decision will be made by the Planning Committee.

**4. Affordable Housing** *Are you able to confirm what is meant by the following? 'We understand that St William are targeting a policy compliant tenure split of 70% low cost rent, and 30% Shared Ownership. St William intend to commit to the delivery 35% on-site affordable homes, in line with the site requirements of London Plan policy.' Does that mean that of the 35% 'affordable' homes, 70% will be rentable and 30 will be shared ownership? What percentage of housing will actually be 'social' housing?*

The final tenure split is yet to be finalised. St William are working towards delivering a scheme where 35% of the overall number of units will be affordable. Of the 35%, 70% will be low cost "London Affordable Rent" which is capped at GLA housing allowances and 30% will be Shared Ownership. This is in line with draft London Plan policy for utility sites and is considered acceptable.

**5. Site Access:** *Can you give reassurance that no waste will be removed via Clementina or Perth Roads?*

All construction, and operational waste, delivery and servicing requirements will be from Orient Way. There will be no vehicular access to or from the site from Clementina Road or Perth Road. This is considered acceptable.

**6. Car Parking/Transport:** *What 'sustainable transport projects' does the council have planned, to at least maintain, if not improve the local air quality, connectivity and access to public transport. I do not understand why the bus services have been cut when 'Improving local public transport links are high' on the agenda and massive housing development (influx of residents) is part of the local plan.*

This does not specifically relate to the Lea Bridge Gasworks pre-application process. The Council's Highways Development, Transport Policy and Planning Officers are working closely with TfL to ensure that there is sufficient transport infrastructure to meet the needs of our growing communities.

Please see links below to the Council's Local Implementation Plan (LIP) and Enjoy Waltham Forest website:

<https://walthamforest.gov.uk/content/waltham-forest-local-implementation-plan-3>

<https://www.enjoywalthamforest.co.uk/>

The LIP is a statutory document that sets out how the borough proposes to deliver the London Mayor's Transport Investment Strategy (MTS) achieving the goals of 'healthy streets and healthy people', 'a good public transport experience' and 'new homes and jobs'.

Promoting sustainable transport has a positive impact on improving air quality. In 2018 Waltham Forest Council commissioned King's College London's Environmental Research Group to model the impacts of recent road interventions in the borough, particularly the Enjoy Waltham Forest scheme, on air quality.

The report found that measures to prioritise pedestrians and cyclists such as segregated cycle lanes, increased pocket parks and timed road closures had made a marked contribution to improving air quality and health in the borough. Please see the link below for further information:

<https://walthamforest.gov.uk/content/air-quality>

The council is also working on a climate emergency strategy:

<https://walthamforest.gov.uk/content/climate-change>

With respect to the Lea Bridge Gas Works scheme, if planning permission is granted the developer will be required to make to mitigate any adverse impacts of the development by making financial contributions or agreeing to other measures which would be secured by a planning obligation. Financial contributions could be put towards bus and rail frequencies and capacity or delivering the Council's Air Quality Action Plan. Until there is more certainty about development coming forward in the area and TfL's transport improvements, it is not possible to give more information at this time.

**7. Utilities and Infrastructure Draft London Plan** - *What exactly are the plans for increased infrastructure for our ward? If the Gas Works site is not the space for a health hub/doctors surgery, where would this be? And how will this cater for an influx of 8500 new residents? Will there be any more details available regarding infrastructure plans? The letter implies that monies may be spent elsewhere in the borough; what infrastructure will be for this actual ward/estate?*

We are working with the WEL CCG to identify a suitable site for a new health hub in the Lea Bridge Area. This will build on the work we have been doing with them to provide new health facilities in the Blackhorse Lane area, St James and Leyton.

As referred to above, the Council is currently drafting the new Local Plan which will contain more detail on planned infrastructure for Lea Bridge and the south of the Borough. The evidence base which underpins future projects and planning policies is currently being collected. Until there is more certainty (e.g. planning permission and timescales for building the development) it is not possible to comment on what infrastructure will be given to this area. The last letter advised that we are working with colleagues to identify a suitable site for a new health hub. The Infrastructure Delivery Plan is being developed as part of the Local Plan, which will be consulted upon later this year.

## **8. Environmental Considerations:**

### *Blocked Drains*

*I am concerned that the Planning Department say the involvement of Thames Water, 'may result in an opportunity to resolve the existing water infrastructure issues the residents of the Clementina Estate are currently experiencing'. Surely the current ongoing issues of repeatedly blocked drains should be solved first?*

If the drains are blocked then this is a matter to be resolved by Thames Water directly. This is not a planning matter and is not the subject of this planning application. Please call 0800 316 9800 to let Thames Water know. Any future permission on the gasworks will be assessed by Thames Water and conditioned appropriately. This is considered acceptable in planning terms and is standard for all new developments.

### *Contamination Remediation*

*As I am sure you are more than aware, the similar development on the Gas Works in Southall has resulted in alleged substantial breaches of environmental law by Berkeley Group. The development has resulted in unacceptable level of air pollution, as a result of soil excavation and remediation. Many residents are experiencing coughing, nausea, headaches, asthma, nasal, throat and eye irritation which they are linking to the pungent petrol/tar like odour from the site. The site is known to contain volatile organic compounds, including known carcinogens such as benzene and naphthalene (possibly a carcinogen). I, and other residents, would like there to be complete transparency regarding this whole development and specific details regarding the control of the remediation of the land. Specifically how will the waste be disposed of? What chemicals will be unearthed? Do we have a guarantee that contaminated substances will not be driven through the estate? I look forward to seeing the documentation regarding this when the full planning application is view- able.*

As our letter advised, St William will be required to undertake remediation works in accordance with the strategy which is yet to be approved. All documentation including the results of preliminary ground investigations will be submitted as part of the planning application. I cannot comment on the Southall project. The planning application will be assessed by a specialist in land contamination. If the planning application is approved, any agreed remediation works will need to be undertaken by a suitably qualified contractor on behalf of the applicant and if it is not then enforcement action can be taken. This is no further comment to make on this.

## Conclusion

This development proposal is currently at pre-application stage. The applicants have engaged with residents by holding pre-application consultation events. All comments received have been taken into account and, where possible, have been used to influence the emerging proposals. Once the planning application has been received residents will be formally consulted. As many of the points raised will not be fixed until the scheme has reached application stage, I do not think that a further email exchange would be of value.

The easiest way to keep in touch with what is happening with this development is by signing up for the email newsletter at [www.walthamforest.gov.uk/LeaBridgeGasworks](http://www.walthamforest.gov.uk/LeaBridgeGasworks)

Yours sincerely,

A handwritten signature in black ink that reads "Jane Custance". The signature is written in a cursive style with a large initial 'J'.

Jane Custance  
**Director of Planning**  
**Economic Growth and Housing Delivery**