

Project Site: 480-510 Larkshall Road and James Yard, Highams Park

Submitted By: The Highams Park Planning Group (HPPG)

Consultation by: Tailored Living Solutions (Pre-Application Informal Consultation)

1. Introductory Comments

The Highams Park Planning Group (HPPG) accepts that this site will be developed and supports the principles of:

- **Station Infrastructure:** the physical retention, integration, and construction of the new, step-free **Highams Park Overground Station entrance** and its accompanying public civic plaza. However, written confirmation must be provided from Network Rail/Transport for London that they support this idea and have the resources to manage an additional entrance.
- **Brownfield Regeneration:** Reactivating underutilised brownfield parcels in a location with high public transport accessibility (PTAL) aligns with sustainable town centre development principles.
- **Active High Street Frontages:** The inclusion of flexible commercial configurations on the ground floor is welcomed to encourage footfall and visually link the high street to the station plaza.
- **The Palette and Features:** design features included in the proposal are an improvement on the previously approved developments. However, we believe that it is too uniform across the site and more reference could be made to the existing Edwardian architectural features in the district centre.
- **Retail Units:** The inclusion of larger, more flexible retail units on the ground floor. Highams Park already has around 120 mainly small retail units and the inclusion of larger units may attract retail offerings not previously available in the district centre.

That being said, The Highams Park Planning Group does not accept the implication that because two previous schemes were approved with heights of up to seven storeys this proposal will automatically be acceptable. The proposal is significantly different in terms of density and massing. It also provides a wholly different housing mix to that of the approved but, apparently, unviable schemes. Accordingly, this proposal should be scrutinised as a wholly new proposal against HP Plan, Local Plan and London Plan policies to ensure that it satisfies all policy requirements and meets the housing needs of the Highams Park area.

- **Office Space:** There is a significant reduction in commercial space (431m² offered) in comparison to the previous scheme (641m²). This proposal does not appear include any office space. Prior to being purchased for redevelopment by the previous owners these buildings were fully occupied as offices. We recommend that provision of office space on the first floor is considered to provide local employment opportunities.
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2. HPPG's Concerns with this Proposal

A. Absence of On-Site Affordable Housing & Local Policy Deficit

- **Complete Absence of Affordable Housing:** The proposed co-living model features zero on-site affordable housing units. Squeezing out affordable housing directly harms local young people and key workers who are priced out of the private rental market.
- **Lack of an Adopted Local Policy Framework:** Waltham Forest Council currently lacks a dedicated, fully adopted Local Plan policy specifically governing Large-Scale Purpose-Built Shared Living (co-living). Permitting a development of this unprecedented scale in Highams Park creates an unsafe planning precedent in a policy vacuum, running completely ahead of the borough's own design and spatial frameworks.
- **Total Loss of Family Housing (Policy H1 of the Highams Park Plan):** The replacement of 114 approved multi-bedroom apartments with approximately 360 single-occupancy micro-studios completely removes family housing provisions. This is contrary to the explicit local housing demand specified within the Highams Park Neighbourhood Plan. Under Waltham Forest's core housing mix policies (Policy CS2 / DM5), a traditional 336 single-bed scheme would be flatly rejected. The council strictly demands a diverse mix, prioritising family-sized 2 and 3+ bedroom homes, which is why the previous developer was required to include them.
- **The Co-Living Pivot:** Because Tailored Living Solutions is proposing "co-living", the scheme should be assessed by reference to Policy H16 of the London Plan and Waltham Forest's non-traditional housing policy. Under Policy H16, single-occupancy studio rooms are acceptable only if the developer can robustly prove a distinct local market need for single-worker/commuter rental accommodation that cannot be met by standard housing.

B. Massing, Height, and Streetscape ("8-Storey Equivalence")

- **Physical Massing Impact:** A parapet wall surrounding a functional rooftop recreation zone is not a minor architectural detail. To safely enclose a communal outdoor area for 360 residents, the parapet must stand at least 4 to 6 feet high. The brick built roof level open 'pergola' feature to the block closest to the railway crossing adds unnecessary height & bulk to the proposals.
- **Visual Bulk:** The proposal presents a continuous solid parapet which extends the building's vertical facade upwards. The lack of tiering back (a feature of the previously approved scheme) serves only to accentuate the significant increase in height over the existing adjacent buildings and over the previously approved scheme. To the observer at street level on Larkshall Road, this solid perimeter wall blocks the sky and creates the distinct visual massing, bulk, and overshadowing of an additional 8th floor.
- **Vertical Massing Escalation:** The proposal significantly exceeds the height of the previously approved scheme and contends that the shell matches the previously consented heights. However, incorporating a high-slab commercial ground floor and a continuous, solid perimeter safety parapet for the rooftop recreation zone physically inflates the building envelope.
- **Comparison with Previous Application Approved at Appeal:** Comparison of this proposal in the consultation to the previously consented schemes is misleading. The visual massing and street-level bulk effectively mimic an **8-storey building**. 'Assessment' of the consented scheme in appeal decision 3304178 dated 31st January shows the Inspector referred to the different heights of the consented

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scheme ranging from five up to seven storeys for a small section of the Larkshall Road frontage; which the Inspector thought would create a "...focal point and marker to the district centre."

The Inspector concluded that because of its design components "...along with its gradual stepping up, the building would address height sensitively by creating a small cluster of building heights in the central location, culminating with the seven-storey element"

What is now being proposed is unstepped slab blocks along the Larkshall Road frontage which show no sensitivity to the area whatsoever.

Lack of Height Transition at the Level Crossing

- **Monolithic Street Wall:** The proposed massing presents an unyielding, continuous uniform block height that overpowers the sensitive streetscape. Squeezing a continuous, high-elevation building up against the railway tracks creates severe visual oppression.
- **Required Mixed-Height Transition:** The HPPG strongly asserts that the development should incorporate **varied, mixed heights** to break up its massive horizontal profile. The elevations should **step down substantially closer to the Highams Park Level Crossing**. Lowering the building profile adjacent to the tracks ensures a sympathetic transition toward the historic, low-rise station building and signal box, safeguarding the visual entry point to the town centre.

C. Localized Infrastructure Deficit

- **Uncalculated Strain on Services:** Squeezing nearly 360 co-living residents onto a 0.68-acre site represents a potential uplift in the site's population density compared to the approved 114-unit plan. The typical unit layouts show double beds. their scheme could potentially be occupied by 720 people. Local medical centres, wastewater systems, and train capacity may struggle to accommodate this influx of new residents.
- The studio flats risk creating a dormitory of transient residents who are not invested in the area and, as such, will be of little benefit to the local economy and vibrance of the district centre.

3. London Plan Policy H16 Spatial Benchmarking

The proposal shifts the assessment criteria to the London Plan Large-Scale Purpose-Built Shared Living guidelines, creating immense spatial policy hurdles:

- **Unproven Local Market Need:** The developer has yet to supply robust evidence verifying a clear, hyper-local requirement for transient micro-rental hubs over traditional housing in this specific part of Waltham Forest.

Highams Park is an outer London Zone 4 station that lacks the connectability of other more central schemes and is predominantly a 'family' area. The type of 'professional

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singles' targeted might not find it as attractive as an Inner Urban area or even Walthamstow Central.

The success of the scheme also depends on its proper management. How can the Council ensure the developer implements the management regime it sets out? Is that possible by way of an agreement?

- **Institutional Layout Risk:** HPPG has concerns that this proposal is comprised of institutionalised "corridor-packing". Under London Plan Guidance, private single rooms must be arranged into distinct, social "cluster hubs" backed by large, high-quality, non-commercialised internal communal spaces.
- **Affordable Housing Financial Penalty:** Because co-living schemes cannot structurally offer on-site social housing, the scheme must fulfil a substantial, non-negotiable upfront cash-in-lieu payment to Waltham Forest Council to build standard affordable homes elsewhere in the borough. It would be preferred that affordable housing be included on this site to help address the shortage of affordable homes in Highams Park.

4. Suggested Infrastructure Mitigations (S106 & CIL)

Should the Local Planning Authority look favourably upon this application despite the housing mix and density objections raised above, HPPG proposes that the following legally binding Section 106 (S106) obligations are secured:

- **Primary Care & Transport Support:** Direct financial allocations to local GP practices serving the E4 quadrant to expand clinical capacity, alongside underwritten public realm upgrades to protect pedestrian safety on Larkshall Road.
- **On-Site Multi-Use Community Space:** The developer should consider provision and management by them of a fully fitted, hireable community facility on the ground floor with these broad specifications:
 - **Footprint:** A ground-floor, single-level layout of **220–250 sq m** holding **100 seated or 150 standing patrons**.
 - **Storage & Partitions:** High-grade internal acoustic partitions combined with full-height, lockable wall storage units for user-group equipment and chair stacks.
 - **Finishes:** Modern accessible WCs, a basic dry-hire catering kitchenette, a moveable presentation stage, and an integrated **sprung flooring system**.
 - **Usage:** Structural acoustics and licensing optimised for clear-floor wellness classes (yoga, Pilates, toddler groups) by day, and private functions by night.
 - We recommend that the community facility be managed by Tailored Living Solutions as part of the overall site and a charging structure.
 - Hire rates should be set at a level to make them affordable to users.

5. Clarification of Technical issues

Before this scheme moves into a formal planning submission, HPPG requests that Tailored Living Solutions supply the following clear, comparative data sets:

1. **Overlaid Context Elevations:** Comprehensive, scaled cross-sections mapping the exact physical height in feet of the new co-living proposal against the previously consented 114-unit schemes to verify the level crossing step-down profiles and rooftop parapet deviations.
2. **Viability of Use:** A viability/marketing study of the need and likely take up of co-living accommodation in this location.
3. **Pedestrian Microclimate & Wind Assessment:** A formal study to determine if the continuous, solid rooftop recreation parapet creates localized downdrafts or wind-tunnelling effects on Larkshall Road.
4. **Net Commensurate Space Metrics:** A transparent architectural breakdown demonstrating the exact ratio of private bed spaces compared to internal communal lounge, kitchen, and workspace square footage.
5. **Loss of Light:** The slabbing effect of the blocks could well lead to more loss of light than previous proposals. A report should be provided demonstrating the impact of shadows on existing buildings, the station platforms, the station gardens, and the streetscape in general.

6. Conclusion

- The proposed development is far too large and intensive for this suburban setting. It would dominant Highams Park and spoil the character of the centre.
- We have strong reservations about the take up and, therefore, viability of shared living space for young professionals in this location.
- If this proposal goes to the planning application stage without substantial reductions in height, density and massing we will strongly oppose the application.