

## 7 OBJECTIVE 2: BRINGING THE COUNTRY INTO THE CITY

This objective is about the Blackhorse Lane area making the most of its location immediately adjacent to the natural resource of the Lee Valley Regional Park. By improving access to, and views of, the Park, there is the potential to significantly improve the image of the area and to provide local residents with improved access to amenity green space.

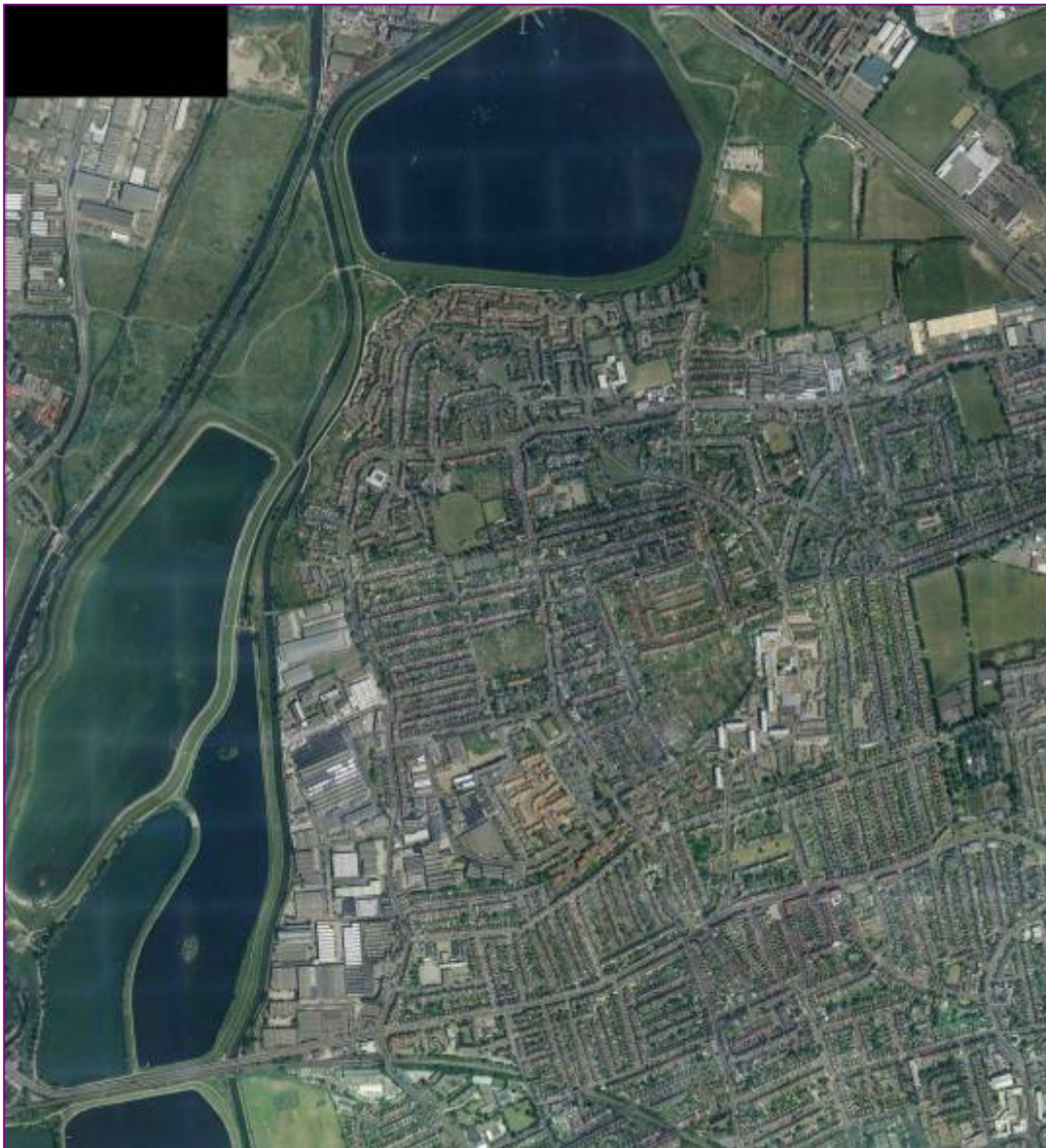
### 7.1 The potential for improved access to the Lee Valley Regional Park

As Figure 11 illustrates, the Blackhorse Lane area is surrounded by the green space and open water of the Lee Valley

Regional Park. In this vicinity the Park includes Walthamstow Reservoirs, Tottenham Marshes plus the open spaces and playing fields north of Billet Road and south west of Blackhorse Lane station. Access to the Lee Valley Regional Park from the Blackhorse Lane area, however, is extremely poor:

- There are almost no views of the Park from residential areas or public spaces.
- There is only one existing path through to Tottenham Marshes that is hidden away, poorly signposted, offers poor access for disabled people and those with pushchairs and is widely perceived

Figure 11. Aerial photo of Blackhorse Lane area



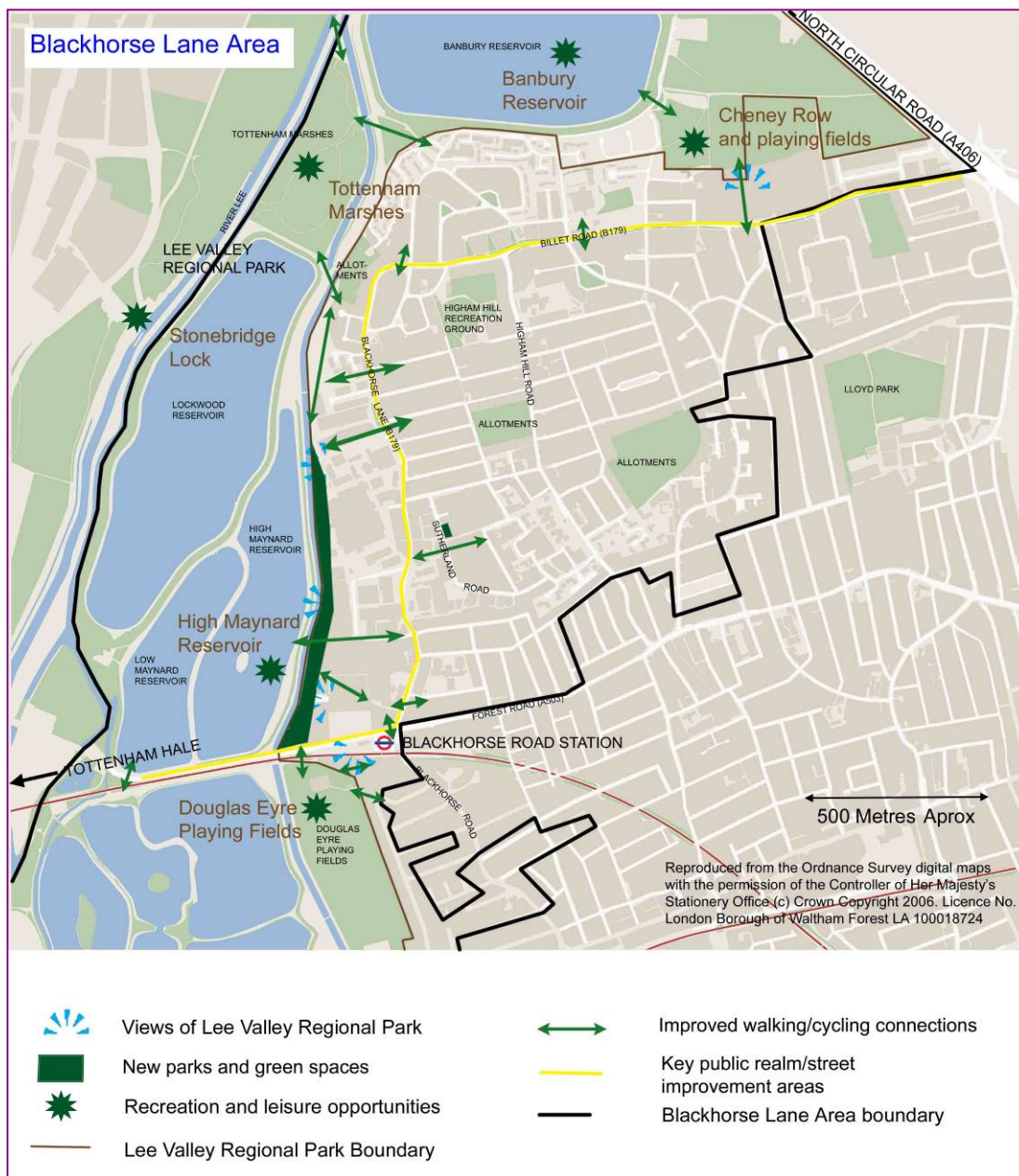
to be unwelcoming, unclean and unsafe.

- The playing fields are hidden from view and accessed via circuitous routes.
- The Blackhorse Lane industrial area acts as a barrier between the residential areas/transport node and the Park, cutting off views and restricting access.
- The only public access to paths around the reservoirs is by permit and via the gatehouse near Tottenham Hale.

Consultation revealed strong demand from local residents for improved access to the Lee Valley Regional Park.

This objective is supported by Regional and Local planning guidance, for example London Plan policies about promoting access to the 'Blue Ribbon Network' of London's waterways<sup>20</sup>, the London Plan Sub-Regional Development Framework for North London policies on access to green space<sup>21</sup> and Lee Valley Regional Park Authority policy requiring "improved links between the Regional Park and adjoining areas for pedestrians and cyclists"<sup>22</sup>.

Figure 12. Improving access to the Lee Valley Regional Park and other green space



The Council is committed to ensuring improved access to green space and the UDP contains a raft of policies to support this aim including policies to create new footpaths and walkways to and through open spaces (Policy ENV19); to improve visitor facilities at sites of nature conservation importance (ENV10); and to create and enhance green corridors (ENV11 & 12).

## 7.2 Improved access, views and signage

**Policy BHL3** The Council will seek to improve access from residential areas and Blackhorse Road station to the Lee Valley Regional Park through seeking external funding and using planning agreements. In particular the Council will seek to:

- i) Create new and improved pedestrian and cycle routes to the Park, in line with UDP Policy ENV19. Key design considerations for paths are community safety, access for disabled people and the incorporation of wildlife habitats.
- ii) Improve signage of pedestrian and cycling routes.
- iii) Create more views of Walthamstow Reservoirs and Tottenham Marshes, including from publicly accessible locations.

Figure 12 illustrates key connections that should be improved and locations where views of the Park can be opened up.

Ferry Lane /Forest Road where it crosses the Park between the reservoirs offers a particularly strong opportunity to improve views of the park from a key entranceway to the area (and to Waltham Forest as a whole). The Council will work with the Lee Valley Regional Park Authority and other partners to seek to improve the landscape and pedestrian environment along this road and open up views across the Regional Park and into the reservoirs.

Several of the identified development sites (sites BHL1, BHL2 and BHL7) border the Lee Valley Regional Park. Through high quality design, housing and mixed use developments on these sites should make a positive contribution to the Park.

**Policy BHL4** All new developments near to the Lee Valley Regional Park should demonstrate that:

- i) They offer a high build and environmental quality, particularly the parts of the development visible from the park.
- ii) They contribute to improving access into and views of the Park, for example by incorporating walking and cycling routes to the park and by ensuring principal rooms, windows and entrances face the park.
- iii) They do not negatively impact on, and if possible enhance, the amenity, openness, ecology and character of the Park.

## 7.3 Proposed waterfront park

**Policy BHL5** The Council will seek funding from external sources and through planning agreements to develop, in partnership with relevant agencies, a new linear waterfront park along the western edge of the Blackhorse Lane industrial area.

UDP Policy ENV16 suggests that the Council will seek to provide new parks and open spaces wherever opportunities arise, for example within new major residential developments.

Figure 12 illustrates the proposal to improve access to the Lee Valley Regional Park through a new linear waterfront park, located adjacent to the reservoirs and offering excellent views over the wider Lee Valley along with a pedestrian and cycle path linking with Tottenham Marshes to the North. Public seating would be located to make the most of the available views. The waterfront park will be in an accessible location close to Blackhorse Road Station and the new developments around it and will provide a new, highly visible gateway to the Lee Valley Regional Park. Natural surveillance of the park at its widest (southern) end will be provided by new residential developments on site BHL1.

A key consideration for the success of the park will be its relationship with the adjacent water. In between the site of the proposed park and the reservoirs lies the Lee Flood Relief Channel, a purpose built water channel designed to reduce flood risk in the Lee Valley and a smaller channel carrying surface water run off called Dagenham

Brook. Unfortunately in its present form these channels present rather unattractive water features due to their sheer concrete sides and low water level at most times.

The Council is working with partners such as the Environment Agency, Thames Water and the Lee Valley Regional Park Authority to explore the feasibility of the waterfront park and its relationship with the flood relief channel and Dagenham Brook. Possibly solutions include naturalisation of a section of one of the channels to improve its amenity and ecology value<sup>23</sup>, bank enhancement works and/or the creation of a new bridge across the channels and incorporation of a section of the eastern bank of High Maynard Reservoir into the proposed park.

By incorporating wildlife areas, the park has the potential to add to the ecology value of the area and enhance the existing green corridor running north-south along the banks of the flood relief channel.

#### 7.4 Recreation opportunities

UDP Policy ENV13 sets out the Council's support for increasing the range and quality of leisure and amenity provision available to Waltham Forest residents in the Lee Valley Regional Park. Policy ENV21 encourages the development of facilities for water-based recreation.

Figure 12 highlights key locations for the potential development of outdoor leisure and recreation facilities. These include:

- **Tottenham Marshes:** Suitable for walking and wildlife activities.
- **Stonebridge Lock:** Main focus of leisure and recreation activities in and around Tottenham Marshes. Already has junior canoeing club and community meeting room. Potential for pub or café, bike hire, children's play facilities, etc.
- **Banbury Reservoir:** Suitable for watersports e.g. sailing, windsurfing. Potential to create access from Cheney Row Open Space.
- **High Maynard Reservoir:** suitable for walking, fishing and birdwatching. Potential for direct access to paths around the reservoir from the new waterfront park.

- **Cheney Row Open Space and adjacent playing fields:** These open spaces will be suitable for developing informal recreational opportunities, particularly for young people. The proposed new Walthamstow Academy to replace McEntee School will enable greater use of the playing fields, while site BHL7 offers the opportunity to create a development that overlooks the open space (providing natural surveillance) and opens up new routes from Billet Road to Cheney Row.
- **Douglas Eyre Playing Fields:** The Council proposes to relocate Willowfield School and relocate the Sports and Social Pavilion for the London Playing Fields Foundation to a site at the northern end of these playing fields (site BHL2b). The new school development would provide a much-enhanced level of sports and leisure provision for both school pupils and the wider community through access to, and further development of, the existing Douglas Eyre playing fields in partnership with the London Playing Fields Foundation.

In line with national planning guidance<sup>24</sup>, in considering planning applications for developments near water (such as on sites BHL1 and BHL7) the Council will ensure that access for sport and recreation purposes would not be restricted and, where possible, would be enhanced. In developing greater community access to water-related recreation opportunities, the Council will support community schemes such as Safer Waterways for London and angling participation projects to address issues of anti-social behaviour and improve the local community's water safety knowledge.

#### 7.5 Greening the area

Making the area 'greener' in both appearance and ecology value can also be achieved by adding plants to the streetscape and buildings visible from the main roads and centres. Wherever possible, new housing and mixed-use developments should incorporate new publicly accessible green spaces and environmental features such as green or 'living' roofs (particularly extensive roof systems), bat roosting and bird nesting boxes and native planting.

In addition, the council will seek planning obligations and other funding to improve the streetscape incorporating additional greenery, focused on the area around Blackhorse Road Station and the main roads marked on the key diagram (Blackhorse Lane, Billet Road and a section of Forest Road).

## 7.6 Other policy considerations

### 7.6.1. Protection of sites of nature conservation importance

UDP Policy ENV7 prohibits developments on land next to or near principal sites of nature conservation importance if it “will have a significant detrimental effect on their nature”. In the Blackhorse Lane area, the key site is the Site of Special Scientific Interest (SSSI) comprising Low Maynard, High Maynard and Lockwood Reservoirs. The Lee Valley is also designated as a Special Protection Area under the EC Directive on the Conservation of Wild Birds (79/409/EEC) affording further protection of birdlife in the area.

Initial consultation with statutory agencies such as Natural England suggests that the proposed waterfront park and some new housing overlooking High Maynard reservoir are viable without a detrimental effect on the SSSI. The housing would be set back from the SSSI because of the waterfront park. Nevertheless, planning applications for sites BHL1 & BHL2 will be required to demonstrate that they conform to UDP Policy ENV7, for example in terms of the impact on light pollution and the flight paths of birds.

Any changes to the arrangements for public access to the reservoirs would only be supported if it could be demonstrated that they would not have a negative impact on the conservation of the SSSI.

Under the EC Habitats Directive (92/43/EEC) an ‘appropriate assessment’ should be undertaken to assess the impact of land-use plan against the conservation objectives of any nearby Special Protection Areas such as the Lee Valley and to ascertain whether it would adversely affect the integrity of that site. The Council is currently preparing a screening report on the need for detailed Appropriate Assessment. The screening report (and

any response to the report from Natural England) will be published on the Council’s website. If the screening report suggests that further assessment is required it will be undertaken subsequently, probably as part of the preparation of an Area Action Plan for Blackhorse Lane within the Waltham Forest Local Development Framework (see Section 1.2).

### 7.6.2. School development on Green Belt land

The development schedule identifies site BHL2 for residential development and a relocated school adjacent to Douglas Eyre Playing Fields. BHL2a is the same site as MOS4 designated as a Major Opportunity Site in the UDP. BHL2b indicates that the school could be located on part of the northern section of the Douglas Eyre Playing Fields that are designated as Metropolitan Green Belt protected by national guidance<sup>25</sup> and UDP Policy ENV3. This states that within the green belt approval will only be given for the construction of new buildings for purposes ‘related to agriculture and forestry, outdoor sport and recreation, cemeteries or other uses appropriate to the open nature and character of the green belt’.

As part of the proposal, the existing pavilion at the southern end of the playing fields would be relocated and changing facilities incorporated into the school buildings at the northern end, so the net reduction in open land would be relatively small.

Nevertheless, a school is deemed by these policies to be an inappropriate use of Green Belt land which will only be approved ‘in very special circumstances’. The national guidance states that ‘Very special circumstances to justify inappropriate development will not exist unless the harm by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.’

In this case, the council believes that there are very special circumstances created by the combination of the following benefits of allowing the school development:

- The provision of modern, purpose built accommodation would significantly improve the learning environment for students at Willowfield School and accommodate future growth in school rolls.

- It is the only viable site in the area of sufficient size to accord with government recommendations for the site area for a secondary school of its size.
- Creating a high quality school in an attractive location would contribute to the regeneration of the area by making Blackhorse Lane more attractive to existing families and new residents with children.
- The future of the sports grounds would be secured and the facilities opened up to wider use both by the school and by local residents through shared use arrangements. Early plans for the school indicate that the current numbers of playing pitches would be maintained and, as part of the package, the council would work with the London Playing Fields Foundation and invest in the playing fields to create at Douglas Eyre a high quality range of sports, social and changing facilities. These improvements would help the borough to make the most of the Olympics by maximising the interest and participation of local people in sport.
- Improved sustainable accessibility from Blackhorse Lane transport hub and for walking and cycling to the Playing Fields.

- Improved 'greening' of the site to return parts of the site to fields/landscaping.
- It would provide an attractive landscaped northern edge to the playing fields providing the playing fields and adjacent residential properties with screening from the railway line and busy Forest Road to the north.

The nature of any development would be scrutinised closely at the detailed planning application stage to examine whether these very special circumstances have been met. Section 12.2 provides detailed development and design principles for site BHL2 designed to minimise the loss of Green Belt and any adverse impact on the quality of life of neighbouring residents.

The proposed loss of open space will be offset by proposed new open spaces within the Blackhorse Lane area as a whole, in particular the proposed waterfront linear park (see Section 7.3). As part of the process of preparing the Waltham Forest Local Development Framework, the Council will consider whether the Metropolitan Green Belt should be extended to include the proposed waterfront park.