

## 8 OBJECTIVE 3: MEETING HOUSING NEED

### 8.1 Housing targets and need

As clearly set out in the borough's Unitary Development Plan (UDP) Waltham Forest is committed to increasing the amount and quality of housing in the borough, including a mix of housing types and affordable housing.

The London Plan allocates Waltham Forest a target of creating 9,140 new homes between 1997 and 2016 (an average of 460 per year) and the London Plan Review is likely to increase this target perhaps to around 600 based on the findings of the 2004 London Housing Capacity Study. Lack of affordable housing in particular is a key issue across the borough and the latest Index of Multiple Deprivation statistics for 2004 highlight housing deprivation as a

major issue within Blackhorse Lane.

### 8.2 Proposed housing and mixed used development in Blackhorse Lane

In order to help address housing need and achieve housing growth targets, Policy BHL1 supports the development of housing, in some cases as part of mixed use developments, on six sites across the Blackhorse Lane area (see development sites map, Figure 9). The sites are located within three growth areas (see Figure 13):

- Station Area (sites BHL1, BHL2 and BHL3) around Blackhorse Road Station
- Sutherland Road (sites BHL4 and BHL5), approximately half a mile north of the station.

Figure 13. Main growth areas



- Billet/Kimberley (site BHL7) on Billet Road in the north of the area.

Most of these sites are currently in industrial use although three have mixed use designations in the UDP.

Developments on these sites will be expected to comply with all relevant UDP policies.

By encouraging developments on these sites, the council is aiming to achieve around 2000 new homes in the area over the next ten years. In line with the London Plan, the council's target is for around 700 (35%) of these to be social rented housing and 300 (15%) to be 'intermediate' housing e.g. key worker rented housing, low-cost home ownership and shared ownership.

### 8.3 Design of housing and mixed use developments

The vision for the Blackhorse Lane area is for a *thriving, more attractive place for both residents and businesses*. The council's intention, in line with UDP Policy HSG4, is that housing developments should not only offer high quality living for new residents but also contribute positively to the quality of life of existing residents through high quality design and by contributing to the delivery of an improved environment, new shops, services, leisure opportunities and commercial premises.

In line with both national and London policy, housing and mixed use developments should use good design in order to create places that integrate different uses in a planned way so as to create synergies between uses and mitigate potential conflicts. In particular, proposals for high density residential development will be expected to demonstrate how high quality design and management arrangements will ensure that social or management problems are not created. Key issues to be addressed are internal space, amenity space, security, noise, privacy, integration of tenures and access to services and facilities. Developers should refer to the detailed UDP Policies relating to these issues. For example:

- UDP Policies PSC1 – PSC3 provide design standards relating to safety, privacy and amenity.

- UDP Policy BHE7 highlights the need for the design of developments to reduce opportunities for crime (see Section 8.3.2).
- UDP Policy BHE1 states that new development should be compatible with its surroundings in terms of scheme layout, scale, mass, height, and materials, and should harmonise with the surrounding townscape.

As well as providing additional housing, proposals for housing and mixed use developments will be expected to contribute to the delivery of the other objectives of the planning framework as set out in the relevant sections of this document through their design and/or through planning obligations (see Section 13).

Design issues to be considered in developing individual sites are provided in Section 12. The Council is also publishing planning and design briefs setting out detailed development and design principles for some of the key sites/growth areas. Policy BHE2 states that applications for developments of 0.25ha or more should be accompanied by an urban design statement. Due to new legislation<sup>26</sup>, design and access statements will become a legal requirement for all planning applications except householder, changes of use and engineering and mining operations from 10 August 2006. The new statements will cover design issues including information about how the design will ensure access for disabled people.

#### 8.3.1 Access and equal opportunities

In line with UDP Policy BHE5, the Council is committed to ensuring that all new developments are fully accessible to all sections of the community including disabled people. Developers will be expected to follow best practice in terms of inclusive design principles as set out in the Council's 'Access for All' guidelines and London Plan Supplementary Guidance "Accessible London: Achieving an Inclusive Environment"<sup>27</sup>.

In line with UDP Policy SG10 the Council will seek to ensure that all new housing is built to 'lifetime homes' standards, and that 10% of new housing is designed to be wheelchair accessible, or easily adaptable for residents who are wheelchair users.

It is also vital that equal access is provided to proposed new facilities such as the Neighbourhood Centre and waterfront park and that improved pedestrian connections are fully accessible.

### 8.3.2. *Designing out crime*

In line with UDP Policy BHE7, all development proposals should aim to achieve the aims and incorporate principles of the 'Secured By Design' scheme, which provides guidance on ways of 'designing out crime' (see [www.securedbydesign.com](http://www.securedbydesign.com)). The Council will encourage planning applicants to contact local Metropolitan Police Service Crime Prevention & Design Advisers as early as possible in the design/application process.

Planning and Design Briefs for key sites are being published which include detailed guidance on 'designing out crime' issues most relevant to the particular site. Some of the key issues to be considered in developments in the Blackhorse Lane area are:

- Public, private and semi-private spaces should be clearly defined in terms of their use and control, with internal courtyards and shared gardens secured against casual intrusion.
- Public spaces and access ways through or adjoining a site (such as proposed new walking and cycling connections) should be overlooked by development, provided with good lighting, set away from cover and provide good sight lines.
- Given the desire to minimise levels of on-street car parking, careful thought must be given to the location and design of car parking, especially underground or undercroft parking. Developers will be encouraged to work towards the 'Park Mark' standard for safer parking.
- Communal entrance doors are a key potential weakness of large flatted developments. Developers are strongly encouraged to incorporate secure electronic entrance systems using programmable key cards, CCTV systems allowing clear facial identification and/or concierge systems.
- The proposed new publicly accessible spaces (including the station square

and waterfront park in the Station Area, the proposed new green space on Sutherland Road and the potential new green space within the Kimberley/Billet Works development) should be carefully designed to reduce opportunities for crime and anti-social behaviour, for example through lighting and planting schemes that will work together to maximise visibility and natural surveillance, through CCTV where appropriate and by ensuring public seating is designed and located so as to discourage anti-social behaviour.

## 8.4 Housing tenure, type and density

**Policy BHL P6** In line with Unitary Development Plan Policies, it is the council's intention to support a mixture of housing sizes and types across the area in order to reflect the position, public transport accessibility and surrounding townscape of each site and the housing needs of the borough and London more widely. In particular, sites further from Blackhorse Road Station will be expected to include a proportion of larger homes with 3 or more bedrooms and gardens. The council will apply targets relating to affordable housing proportions and mix from the Unitary Development Plan and the forthcoming Interim Planning Policy Guidance on Planning Obligations.

UDP Policy HSG5 encourages higher density residential development in areas with high levels of public transport accessibility. Policy PSC4 sets out guideline figures for maximum residential densities. Higher density housing (up to 450 habitable rooms per hectare<sup>28</sup>) is encouraged within 10 minutes walking distance of major transport hubs such as Walthamstow Town Centre or in other locations with very good public transport (PTAL levels 5 or 6) and access to a range of services. The policy specifies a maximum of 250 habitable rooms per hectare elsewhere. On this basis sites in the Station Area might qualify for density of up to 450 habitable rooms per hectare, while sites in the Sutherland Road and Billet/Kimberley growth areas could have density of up to 250 habitable rooms per hectare.

However, the London Plan encourages higher densities in urban areas with good access to public transport if low levels of car parking are provided. For example, it suggests that 300-450 habitable rooms per hectare would be suitable for sites along a transport corridor or close to a town centre (e.g. sites in Sutherland Road) and that sites within 10 minutes walk of a Town Centre and with good access to public transport could be suitable for higher densities, of 450-700 habitable rooms per hectare<sup>29</sup>.

As noted in the UDP, the council will be flexible in its use of density controls and 'proposals for new residential developments will be judged mainly on the quality of their design and their ability to satisfy the Council's other planning policies and standards'.<sup>30</sup> In addition, it is acknowledged that there are a number of factors supporting higher density on some of the sites in Blackhorse Lane, subject to justification in design terms:

- Blackhorse Road Station itself offers significant public transport access and sufficient capacity (see Section 11.2).
- Sites near the station are within a Controlled Parking Zone and will be subject to restrictive parking standards.
- The proposed creation of a new Neighbourhood Centre next to the station will allow residents to access more convenience goods without the need to travel outside the area.
- Site BHL1 in particular offers an exceptional location which would lend itself to high density development: adjacent to a transport hub; bordered on one side only by existing housing; at a key gateway to the borough; immediately adjacent to Walthamstow Reservoirs; and incorporating the proposed new Neighbourhood Centre.

UDP Policy HSG6 states that the Council will negotiate for the maximum reasonable amount of affordable housing in new housing developments. It will aim to hit the Mayor's overall target of 50% of the total of new housing from all sources including local authority and Registered Social Landlord developments. UDP Policy HSG7 states that the indicative target for affordable housing from *private development* is 40% for individual schemes of 0.5 hectares and above or of 15 units or

greater. The Council will apply these targets sensitively taking account of the individual site costs, economic viability, including the availability of public subsidy, and other planning objectives. Note that in line with UDP paragraph 3.45 the 15 unit threshold may be lowered in future subject to changes to national guidance and/or the London Plan.

In line with the London Plan, the Council will aim for a 70:30 split of social to intermediate housing. Based on an assessment of local and regional housing needs, the Council will aim for a room mix for each type of affordable housing as set out below:

Affordable Housing Mix		
Dwelling size	Type of housing	
	Social rented	Inter-mediate
1 bedroom	13%	25%
2 bedrooms	32%	40%
3 bedrooms	31%	25%
4+ bedrooms	24%	10%

**8.5 Sustainable development and flood risk**

All new development, both residential and commercial, should also be energy efficient in terms of design, density, location and orientation (see UDP Policy WPM20 and London Plan Policies 4A.7 and 8) and proposals should incorporate and include 10% of total predicted energy consumption to be in the form of renewable energy sources (see UDP Policy WPM21 and London Plan Policies 4A.7 and 9). The Council intends to seek active involvement of developers in the promotion and use of this technology, and encourages developers to engage in discussions with the Council as early in the planning process as possible.

The London Plan North London Sub Regional Development Framework Annex 2 includes provisional assessments of the impact of forecast growth across the Upper Lee Valley on water, sewage and energy infrastructure<sup>31</sup>. It concludes that strengthening of the existing infrastructure is likely to be necessary for water, sewage and electricity and that subject to the nature

of proposals developers may need to undertake studies to ascertain the impact of development on existing infrastructure. As noted in UDP paragraph 9.12 “developers are reminded of the provision of the Water Industry Act 1991 and that the Council will consult the relevant statutory undertakers regarding water and sewerage infrastructure where a proposed development is likely to have significant implications for these services.”

In line with UDP Policy WPM5, developers will be required to provide recycling points throughout any new development.

Being within the Lee Valley, parts of the Blackhorse Lane area are at risk of flooding, including areas within Flood Zone 3 which is likely to be flooded on average once every hundred years. UDP Policy WPM18 requires developers to demonstrate that proposals would not result in an unacceptable increase in the risk of flooding to people, property and essential service provision and WPM19 requires new developments to utilise sustainable drainage techniques wherever practicable.

Developers will be required to undertake site specific flood risk assessments if requested by the council (on the advice of the Environment Agency), usually for developments within Flood Zone 2 or 3 or of significant size. Developments must have their lowest residential areas above the ‘Flood Zone 3 design level’ (the water level predicted for a 1 in 100 year flood plus a 20% increase in flow) and must not reduce (and should aim to increase) the overall level of flood capacity.

The Council and the Environment Agency will always encourage developers to adopt a sustainable approach to dealing with surface water run off in order to manage the disposal of surface water in a more sustainable manner. Developers will be expected to demonstrate how the principles of Sustainable Drainage Systems (SUDS) have been applied to their development with the reasons for not using SUDS or attenuation systems for surface water run off clearly justified. In addition, developers are likely to be expected to carry out a

preliminary drainage design strategy to identify which SUDS options could be adopted for their site. Any SUDS measures draining into ground needs to take contamination possibilities into account. Therefore any areas to drain to ground will need to carry out a desktop study and if necessary a site investigation<sup>32</sup>. There are a number of historic landfills in the development area that will be unsuitable for drainage to ground.

The Council has commissioned a Strategic Flood Risk Assessment for the Blackhorse Lane area, which developers should consult when developing proposals. The draft report provides the following general advice relating to key sites as indicated on the development sites map (Figure 9):

*Sites BHL4 (Sutherland Road) and BHL7 (Billet Works)* are within Flood Zone 1 and therefore at low risk from flooding. A development on either of these sites should aim to reduce the level of run-off generated from the site and the quality of run-off through sustainable ground water drainage techniques and consideration of overland flow paths.

*Site BHL1 (Station Hub and Waterfront)* falls partially within flood zones 3 and 2 but is already developed and defended by the Flood Relief Channel. If it is to be redeveloped, in addition to incorporation of sustainable drainage techniques and consideration of overland flow paths, mitigation measures should be put in place for any proposed building within the 1 in a 100 year event flood zone e.g. raising the final floor residential level above the Flood Zone 3 design level and careful wetproofing detail.

*BHL2 (Blackhorse Road / Hawarden Road / Douglas Eyre Playing Fields)* includes a section of Douglas Eyre Playing Fields which is within Flood Zone 3 (BHL2b). Development within this section of the site (the proposed location for the school) would require measures to maintain greenfield run off rates plus the provision of equivalent floodplain storage capacity to that lost by the development.