



Blackhorse Lane Area Action Plan

Additional Minor Modifications

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<p>يمكن توفير هذه الوثيقة أو ملخصها بلغات أخرى أو بالطبعة الكبيرة أو بلغة بريل أو على الشريط. ويمكن توفير خدمة ترجمة عند الطلب. وإذا احتجت منالاً من هذه الخدمات الرجاء الاتصال معنا على العنوان المذكور أدناه.</p>	<p>यह पर्चा या इसका संक्षेप अन्य भाषाओं में, बड़े अक्षरों में या सुनने वाली टेप पर माँग कर लिया जा सकता है, और अन्य भाषाओं में अनुवाद की सुविधा भी मिल सकती है। यदि आपको इन सुविधाओं की जरूरत है तो कृपया निम्नलिखित पते पर हमारे साथ संपर्क करें।</p>
<p>অনুরোধক্রমে এই ডকুমেন্টে অথবা এর সারসর্ম অন্যান্য ভাষায়, বড় ছাপার অক্ষরে, ব্রেইল বা অক্ষলিপিতে, অডিও টেইপ বা বাজিয়ে শোনার কেসেটে অথবা অনুবাদ করে দেয়ার ব্যবস্থা করা যাবে। আপনার যদি এসব সেবাসমূহের প্রয়োজন হয়, তাহলে অনুগ্রহ করে আমাদের সাথে নীচের ঠিকানায় যোগাযোগ করুন।</p>	<p>ਇਹ ਪਰਚਾ ਜਾਂ ਇਹਦਾ ਖੁਲਾਸਾ ਹੋਰ ਭਾਸ਼ਾਵਾਂ ਵਿਚ, ਵੱਡੇ ਅੱਖਰਾਂ ਵਿਚ, ਜਾਂ ਸੁਣਨ ਵਾਲੀ ਟੇਪ 'ਤੇ ਮੰਗ ਕੇ ਲਿਆ ਜਾ ਸਕਦਾ ਹੈ, ਅਤੇ ਹੋਰ ਭਾਸ਼ਾਵਾਂ ਵਿਚ ਤਰਜਮਾ ਕਰਨ ਦੀ ਸਹੂਲਤ ਵੀ ਮਿਲ ਸਕਦੀ ਹੈ। ਜੇ ਇਹਨਾਂ ਸਹੂਲਤਾਂ ਦੀ ਤੁਹਾਨੂੰ ਲੋੜ ਹੈ, ਤਾਂ ਕਿਰਪਾ ਕਰਕੇ ਹੇਠ ਲਿਖੇ ਪਤੇ 'ਤੇ ਸਾਡੇ ਠਾਲ ਸੰਪਰਕ ਕਰੋ।</p>
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<p>Name _____ Address _____ _____ _____ Telephone No _____</p>	<p>CONTACT: Planning Policy Team Environment and Regeneration London Borough of Waltham Forest Sycamore House, Waltham Forest Town Hall Forest Road, Walthamstow, London, E17 4JF Telephone 020 8496 3000 Email: planning.policy@walthamforest.gov.uk Web site: www.walthamforest.gov.uk</p>

Purpose of this schedule:

This schedule contains the 'Additional Minor Modifications' proposed to be made to the submitted Blackhorse Lane Area Action Plan.

'Additional Minor Modifications' are considered to be minor changes to the Plan.

On 28th February 2014, the Council submitted the Blackhorse Lane Area Action Plan to the Planning Inspectorate for independent examination. The document provides planning policies and guidance on the regeneration of key sites, and will be used alongside other Local Plan documents to determine planning applications within the Blackhorse Lane Area.

As part of the submission of the Area Action Plan, the Council produced a Schedule of Post Publication Modifications (document reference BHLSD2). This document provides an updated version of that Schedule to incorporate further minor modifications that have arisen during the examination. It excludes matters the Inspector has deemed to be 'Main Modifications'; which are set out in a separate Schedule.

It is the Council's view that the 'Additional Minor Modifications' included in this schedule, together with the 'Main Modifications' set out in a separate schedule, strengthen and improve the AAP and thus the Council's ambitions for the area.

The modifications below are expressed either in the conventional form of strikethrough for deletions and bold for additions of text.

The page numbers and paragraph numbering below refer to the Blackhorse Lane Area Action Plan - Proposed Submission – March 2013.

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1 Introduction

1.1 What will the Area Action Plan do?

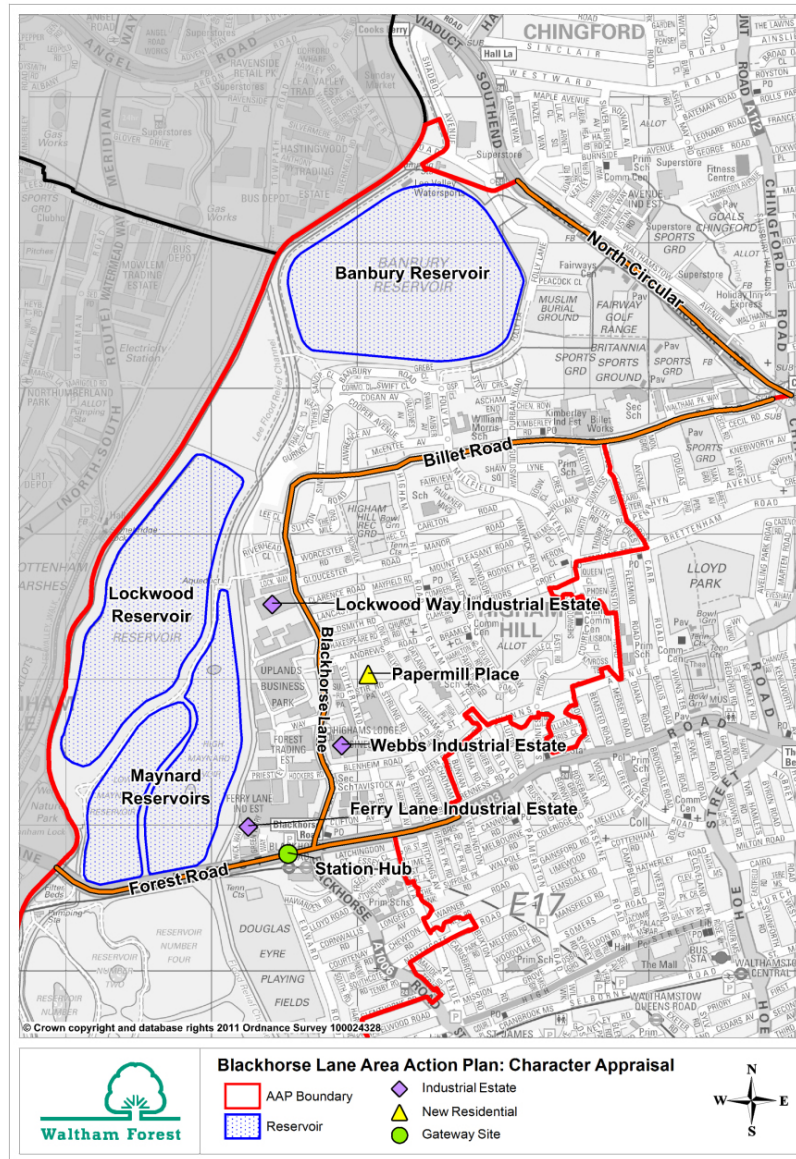
Modification number	Page number	Policy/ Paragraph number	Proposed change	Justification	Source of change/ representation number
AM1	2	Paragraphs 1.1.1-1.1.5	<p>Rephrase section 1.1 to read:</p> <p>"Under the governments planning system, all Councils are required to produce a Local Plan that sets out policies to guide new developments over a 15-20 year period. Our Core Strategy, which was adopted in AprilMarch 2012, sets out the broad vision of how the borough should develop, and identifies 4 key growth areas where our regeneration efforts should be focussed.</p> <p>Blackhorse Lane is one of these key growth areas, and it is also recognised in the Mayor's London Plan and Upper Lee Valley Opportunity Area Planning Framework as a strategically important location and major development opportunity. Through these strategic documents it has beenAt this strategic level, the Core Strategy anticipated that the area has the capacity to accommodate growth in the region of 2500 new homes, and 1000 new jobs.</p> <p>This Area Action Plan (AAP) will form part of our Local Plan, and sets out a framework for how growth should</p>	To clarify the scale of opportunity for change in the area	bh\ps57

Modification number	Page number	Policy/ Paragraph number	Proposed change	Justification	Source of change/ representation number
			<p>be co-ordinated, to transform the area and secure a sustainable pattern of development and maximum community gains. It sets out a comprehensive approach to the redevelopment of the area to secure new high quality homes and modern business space, along with supporting infrastructure includingwhere new housing and businesses should go, and proposed infrastructure improvements to support this growth. This includes new and improved pedestrian/ cycle routes, open spaces, and community facilities such as schools and health centres.</p> <p>Once adopted, the AAP will be a statutory document used to determine planning applications in the area. It compliments, and should be read alongside the Core Strategy and Development Management Policies.</p> <p>The AAP is supported by a number of documents, including a Sustainability Appraisal, Habitats Regulations Assessment, Equalities Impact Assessment, and Urban Design Framework.</p> <p>The Urban Design Framework has been important in informing the AAP, and includes planning and design briefs for opportunity sites at the Station Hub and Sutherland Road. It offers detailed design guidance that is supplementary to the AAP, and will be treated as a</p>		

Modification number	Page number	Policy/ Paragraph number	Proposed change	Justification	Source of change/ representation number
			material consideration in determining planning applications in the area."		

1.2 Context

Modification number	Page number	Policy/ Paragraph number	Proposed change	Justification	Source of change/ representation number
AM2	6	Figure 2	Update as shown below	To correct location of Ferry Lane Industrial Estate	bh1ps58



1.3 Key issues

Modification number	Page number	Policy/ Paragraph number	Proposed change	Justification	Source of change/ representation number
AM3	8-11	Paragraphs 1.3.1- 1.3.8	<p>Rephrase section 1.3 to read:</p> <p>"Some of the more deprived communities in London live in the area, and pockets of poor environmental quality and underused industrial land reduce the quality of life for local residents. There are few facilities to serve the needs of residents and businesses, and a lack of publicly accessible open space. In recent surveys of visitors to the area, 60% of those asked felt the physical environment was either 'poor' or 'very poor', and 65% felt the shopping offer was 'poor' or 'very poor' (Shared Intelligence, 2013).</p> <p>The Lee Valley Regional Park includes the large open waterspaces of Walthamstow Reservoirs, the River Lee, and the green spaces of Tottenham Marshes. Existing access to, and views of these areas are extremely limited, with existing industrial areas providing a significant barrier.</p> <p>A large number of people pass through the area on a daily basis yet few stay for any length of time. Many motorists either use Blackhorse Lane and Forest Road as a route to inner London, or park near Blackhorse Road Station and use it as an interchange.</p>	To clarify the scale of opportunity for change in the area	bh/lps57

Modification number	Page number	Policy/ Paragraph number	Proposed change	Justification	Source of change/ representation number
			<p>Despite these issues, the area has fantastic potential, and is already undergoing significant change. Since work on the AAP commenced, a number of development proposals have come forward to provide quality new homes, modern business and retail space. Public sector investment in the public realm is also underway.</p> <p>To ensure future developments fully realise the scale of opportunity in the area, it is important to also recognise the assets of the area.</p> <p>The area has a strong industrial heritage.In recent years some new residential developments have been secured, whilst anAn existing business community provides a range of job opportunities including in traditional manufacturing and emerging ‘creative’ sectors such as music recording and productions, printers, graphic designers, community artists, computer software development and skilled craftsmanship. Examples include Inky Cuttlefish (printmaking and art studios), Barbican Arts Group Trust, and Dunhills (international company manufacturing hand made luxury goods). Retained industrial areasThere is also provide an opportunity to capitalise on the emergence of green industries in the wider Upper Lee Valley.</p>		

Modification number	Page number	Policy/ Paragraph number	Proposed change	Justification	Source of change/ representation number
			<p>Recognising the major asset of the Lee Valley Regional Park, the Walthamstow Wetlands project has recently been set up with the aims of establishing a new wetland centre in the area, and improving access to these existing open spaces for local communities and regional visitors.</p> <p>The area benefits from an important transport hub at Blackhorse Road Station, providing convenient access to the Victoria Line and overground Barking to Gospel Oak rail services. A range of bus services also link the area to Walthamstow and the rest of the borough.</p> <p>Key assets such as Blackhorse Road Station, Lee Valley Regional Park, the industrial heritage and emergence of creative clusters, provide a fantastic opportunity for the area to become a rejuvenated local hub of activity that is a destination in its own right, and an attractive 'gateway' into the borough.</p> <p>future developments are well planned, the area can become a destination in its own right. By attracting new investment, we can secure benefits for existing communities; such as improved access to Walthamstow Wetlands, improvements to the quality of the local environment, improved cycle and pedestrian routes, and new shops, services, and education facilities that meet the needs of local residents and businesses. The community can also benefit from major regeneration</p>		

Modification number	Page number	Policy/ Paragraph number	Proposed change	Justification	Source of change/ representation number
			projects nearby in Tottenham Hale, Walthamstow Town Centre, and Stratford. In particular the area around the station provides a key 'gateway' into Waltham Forest and provides major opportunities for future developments, including potential better connections into the Lee Valley Regional Park and open spaces."		

2 Vision and Objectives

2.1 Vision

Modification number	Page number	Policy/ Paragraph number	Proposed change	Justification	Source of change/ representation number
No modifications	-	-	-	-	-

2.2 Objectives

Modification number	Page number	Policy/ Paragraph number	Proposed change	Justification	Source of change/ representation number
No modifications	-	-	-	-	-

3 Key Policy Areas

3.1 Introduction

Modification number	Page number	Policy/ Paragraph number	Proposed change	Justification	Source of change/ representation number
No modifications	-	-	-	-	-

3.2 Housing

Modification number	Page numbers	Policy/ Paragraph numbers	Proposed change	Justification	Source of change/ representation number
AM6	18	Policy BHL2	At end of policy, insert: “Any proposals for purpose built student accommodation should not undermine the Council’s ability to meet its housing growth targets and provide for mixed and balanced communities, or result in overdevelopment of opportunity sites. Such accommodation should be located close to the neighbourhood centre and Blackhorse Road Station, be linked to a registered provider of higher education accommodation, and meet the space standards set out in Development Management Policy DM9.”	To clarify the Councils approach to proposals for student housing in accordance with its adopted DM Policies	bhIps22/ 25
AM7	18	Paragraph 3.2.3	Delete last sentence of paragraph 3.2.3: “However, looking at individual sites in more detail, it has since been concluded that better quality schemes can be achieved on some sites through lower densities than envisaged at the time of the examination of the Core Strategy.”	To conform with changes proposed to policy BHL2	bhIps16

Modification number	Page numbers	Policy/ Paragraph numbers	Proposed change	Justification	Source of change/ representation number
AM8	19	Paragraph 3.2.4	<p>Before paragraph 3.2.4 insert:</p> <p>“At a strategic level, it is recognised that there is a growing need for student accommodation to support London’s higher education establishments. As Blackhorse Lane is within 30 minutes travel time of Central London, there may be potential to absorb some of this demand within the AAP areas more accessible locations. However, as there is no University presence or London Plan target for new student bedspace provision in the borough, it is important that any such provision does not compromise the delivery of new housing on opportunity sites, or reduce the quality of schemes by encouraging overdevelopment.</p> <p>Our Housing Needs Assessment and Strategic Housing Market Assessment found that Blackhorse Lane has a mobile population; with low levels of owner occupation and a high private rented sector. A key objective of the AAP is therefore to provide a range of high quality homes for families and the upwardly mobile. Any proposals for student housing will need to be considered in this context; both in terms of ensuring a mixed and balanced community can</p>	To conform with modifications to BHL2	Council

Modification number	Page numbers	Policy/ Paragraph numbers	Proposed change	Justification	Source of change/ representation number
			be achieved, and in terms of making a convincing case of the benefits a student population would bring to the local economy."		
AM9	19	Policy BHL3c	Rephrase to read: "the need to provide a high quality design; including generous room sizes, storage space and communal gardens where appropriate. As a minimum, the standards set out in Development Management Policies DM7 (Amenity and Internal Space) and DM8 (Housing Quality and Accessibility) DM29 (Design Principles, Standards and Local Distinctiveness) should be met."	To be consistent with changes made to DM Policies DPD since the AAP Proposed Submission was prepared	Council
AM10	20	Policy BHL4a	Rephrase to read: "Site BHL1 (Station Hub and Waterfront) and Site BHL2 North (Car Wash Site); a higher proportion of one and two bedroom properties will be acceptable; provided that proposals offer generous room sizes and amenity space. In the interests of securing a high quality scheme at these landmark locations, at least 30% of dwellings at this site must should have 3 or 4 bedrooms."	To ensure policy wording better takes account of potential issues of viability	bhlps21/ 24/ 29/ 36

Modification number	Page numbers	Policy/ Paragraph numbers	Proposed change	Justification	Source of change/ representation number
AM11	21	Policy BHL5	Rephrase 2 nd point of Policy BHL5 to read: <p>“The mix of affordable units in terms of size and tenure should be in accordance with the Development Management Policy DM5 (Housing Mix). The Council will prioritise shared ownership as its preferred intermediate product in Blackhorse Lane.”</p>	To ensure the position previously set out in justification and explanation is reflected in policy wording	Council
AM12	22	Paragraph 3.2.15	Delete last 2 sentences so reads as follows: <p>“Effort is therefore needed to ensure new developments help secure an established community. This means offering products that encourage people to stay in the area. Part of this is about offering properties of a sufficient size, but tenure mix and amenity provision are also key considerations. Whilst in reality we have little control of ‘buy to let’ investors, it is felt necessary to offer opportunities for properties to be bought on the open market, or allowing people to work towards home ownership through intermediate products such as ‘shared ownership’ or ‘rent to buy’. In addition products such as affordable rent will help meet housing need, and can also contribute to a settled community; since such tenants often stay longer in</p>	To remove duplication of revised policy BHL2	Council

Modification number	Page numbers	Policy/ Paragraph numbers	Proposed change	Justification	Source of change/ representation number
			<p>an area than those privately renting. Products such as student housing could further contribute to the mobile nature of the local population, and have other disadvantages including high vacancy levels outside of term time. Such proposals will therefore need to be supported by strong justification of the benefits they would bring to the local economy and vitality and vibrancy of the area.</p>		
AM13	22	Paragraph 3.2.16	<p>Rephrase last two sentences of paragraph 3.2.16 to read:</p> <p>“We will prioritise shared ownership as the preferred intermediate product in this area given that there is a predominance of private rented homes, and shared ownership products could help encourage new residents to settle in the area. Rents on affordable housing should be significantly lower than market rents, as set out in the Core Strategy.</p>	To clarify the justification of policy BHL5	Council

3.3 Employment

Modification number	Page number	Policy/ Paragraph number	Proposed change	Justification	Source of change/ representation number
AM14	24	Paragraphs 3.3.2 - 3.3.3	<p>Revise to read:</p> <p>"London's first buses were designed and built at the Station Hub site, and whilst the manufacturing industry has declined in recent years, the area is still home to major national brands such as Dunhills and Warren Evans. There has also been a growing creative cluster in recent years, with a range of printers, artists and computer games manufacturers establishing themselves in the area. Whilst this mix of uses can contribute to a vibrant community, in some areas the juxtaposition between residential and employment use is uncomfortable.</p> <p>The employment function of the area is an important one, and needs to be supported alongside our aspirations of encouraging more people to live and spend more time in the area. As traditional industries decline, the area needs to adapt to meet the needs of modern businesses that are more compatible with emerging residential. The competing needs of business and residential communities should be balanced to secure a sustainable pattern of growth."</p>	To clarify that some of the emerging employment uses are considered compatible with residential	Council

Modification number	Page number	Policy/ Paragraph number	Proposed change	Justification	Source of change/ representation number
AM15	25	Policy BHL6a	Rephrase first bullet point to read: “offer a flexible floor plate including minimal supporting columns, generous floor to ceiling heights, wide doors and corridors, and a suitable floor loading capacity meet the requirements of Development Management policy DM19c.”	To avoid duplication of Development Management Policies	Council
AM16	25	Policy BHL6a	Insert additional bullet point at end to read: “be marketed at rents and service charges affordable to small and medium enterprises; which may be controlled through the use of planning obligations.”	To clarify how a growth in creative industries will be encouraged	Council
AM17	25	Policy BHL6b	Rephrase to read: "directing general industrial (including green industries), storage, manufacturing and distribution uses to land designated as SIL (as shown on the policies map) . Through partnership working, the Council will explore opportunities for investment in SIL through matters such as improved signage, access and public realm."	To clarify relationship to policies map	Council

Modification number	Page number	Policy/ Paragraph number	Proposed change	Justification	Source of change/ representation number
AM18	26	Policy BHL6g	Insert new point (g) to read: “Where the redevelopment of opportunity sites cannot accommodate occupiers of existing business units on site, the Council will work with landowners and the GLA to assist in their relocation locally.”	To recognise the importance of existing businesses to local employment opportunities.	Council
AM19	26	Paragraph 3.3.5	At end of paragraph insert: "This is consistent with the Council's approach to Borough Employment Areas in key growth areas set out in Core Strategy Policy CS8 and Development Management Policy DM19, and recognition in the Mayor's Upper Lee Valley Opportunity Area Planning Framework that Sutherland Road offers scope for growth and diversification as a mixed use creative quarter."	To clarify the importance of securing new business space on opportunity sites	bhlps58
AM20	26	Paragraph 3.3.6	Replace 4 th sentence with: “Furthermore, the Gort Scott Employment Land Study (2013) indicated an appetite for further growth of such sectors by providers such as Acava and Space Studios. Whilst the creative sector is should be celebrated (as done so through the E17 Arts Trail),	Updated to reflect new evidence base	Council

Modification number	Page number	Policy/ Paragraph number	Proposed change	Justification	Source of change/ representation number
			it is important that new B1 business space is suitable for a variety of business operations compatible with residential uses; which could include light industry and research and development.”		
AM21	27	Paragraphs 3.3.8 - 3.3.9	<p>Rephrase to read:</p> <p>“The scale of new employment space is an important factor in ensuring Blackhorse Lane continues to function effectively as one of the borough's key employment areas; especially given recent pressure for residential led developments. The strong presence of existing small businesses in the area indicates there is a market for such uses, including significant clusters of creative industries and artisan businesses as demonstrated in the Urban Design Framework. Furthermore, the Local Economic Assessment (2011) noted that such businesses are an important component of the local economy and the Gort Scott Employment Land Study indicated further interest in the area from workspace providers. It is therefore important that regeneration efforts secure a significant proportion of new high quality business space to allow this sector to grow, and not force an outward migration of valued local businesses. The nature of businesses compatible with emerging residential means that alongside the</p>	Updated to reflect new evidence base.	Council

Modification number	Page number	Policy/ Paragraph number	Proposed change	Justification	Source of change/ representation number
			<p>quality of units, rent and service charges will have a significant impact on if new space can be successfully let and managed. Planning obligations may therefore be necessary to ensure business space remains affordable as the enabling residential element results in an increase in land values.</p> <p>To support the growth of creative industries in the area, money has been acquired from the Outer London Fund to refurbish and adapt numbers 1 and 2 Sutherland Road an as yet unidentified vacant building within the area to form some workshops and community space. In addition, as set out in opportunity site BHL4 North, units in Sutherland Road currently used for meat processing will be re-used for B1 artisan workshops that are more compatible with surrounding residential. As several opportunity sites have historically been used solely for industrial use, allowing for new mixed use schemes including residential in these areas means that a significant proportion of new fit for purpose employment space should be viable. Section 5.3 provides indicative targets for the mix of uses on each site; which aims to strike a balance that ensures the employment function of the area is not undermined, and an upgrade in the quality of employment stock is achieved. It is also mindful of the findings of our Managed Workspace Study (Shared Intelligence,</p>		

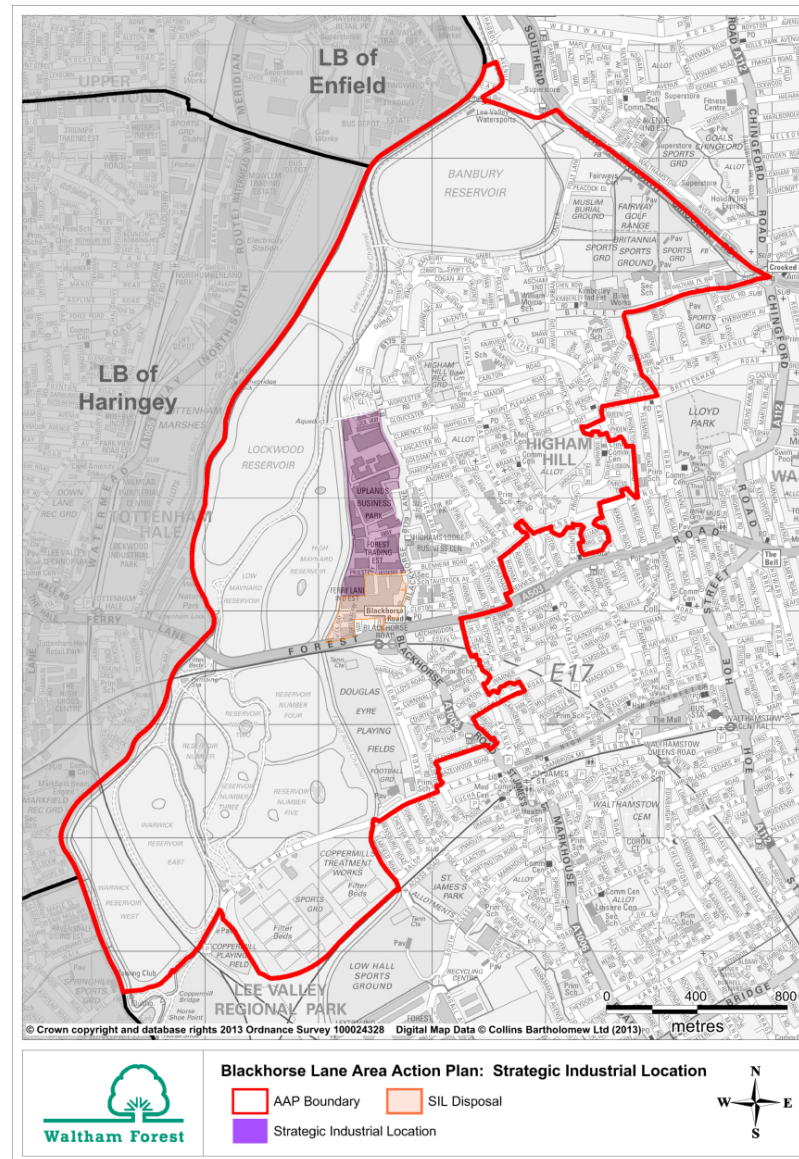
Modification number	Page number	Policy/ Paragraph number	Proposed change	Justification	Source of change/ representation number
			<p>2013) of the benefits of providing a critical mass of new employment spaces for small businesses to enable networking and use of shared facilities.</p> <p>Therefore, where proposals come forward that mean employment targets will not be met, they will need very strong justification that what has been provided is the maximum amount that is viable for the scheme to go ahead.”</p>		
AM22	28	Figure 5	Update figure 5 as shown below	To clarify the extent of land de-designated through the Core Strategy	bhIps58
AM23	29	Paragraph 3.3.11	<p>Insert new 3rd sentence:</p> <p>“The Gort Scott Employment Study (2013) provides evidence of the nature, levels of activity, and productivity of existing businesses in this area”</p>	Updated to reflect new evidence base	Council
AM24	29-30	Paragraphs 3.3.13 - 3.3.14	<p>Rephrase to read:</p> <p>“Through our Core Strategy and the Mayor’s Upper Lee Valley Opportunity Area Planning Framework, previous SIL designations at the Station Hub and Waterfront (Site</p>	To provide further justification of the Council's	bhIps43/ bhIps46/ bhIps17

Modification number	Page number	Policy/ Paragraph number	Proposed change	Justification	Source of change/ representation number
			<p>BHL1) have been removed. This is to realise ambitions for more efficient use of land close to Blackhorse Road Station. Land to the north of the Station Hub does not offer the same opportunities in terms of a new neighbourhood centre close to a major public transport hub; so sensitive uses such as residentialnon industrial uses will be rejected on the basis that they will compromise the function of remaining SIL. They would also undermine future opportunities for the growth sectors discussed in 3.3.12 above; whose requirements include being isolated from residential areas. Where land in this area becomes vacant, it offers scope for redevelopment for business sectors such as those referred to above, or for the relocation of displaced businesses from sites such as the Station Hub and Waterfront, or other industrial areas in the borough where mixed use redevelopment is considered acceptable in principle. This will ensure regeneration efforts do not result in a migration of established businesses out of the borough. This is important as job retention and creation are key objectives for the Council. The retention of SIL is also based on evidence of its fitness for purpose, which was conducted in our Employment Land Review (URS, 2009). The findings of this study have since been scrutinised and accepted by the Planning Inspectorate at the Examination of the Core Strategy, an analysis of the local property</p>	<p>approach to SIL</p>	

Modification number	Page number	Policy/ Paragraph number	Proposed change	Justification	Source of change/ representation number
			<p>market, and up to date projections of changes in employment sectors and demand for employment land. Whilst changes to the SIL boundary set out in the Core Strategy and Upper Lee Valley Opportunity Area Planning Framework were underpinned by the Councils 2009 Employment Study, an updated evaluation of remaining land designated a SIL has been used to inform this AAP. This found that there had been no material change in employment land projections from that already planned for, that remaining SIL was largely occupied and displayed suitable site characteristics for an industrial classification, and that Blackhorse Lane was held in high regard as an industrial location in the local property market area. It therefore concluded that there was no compelling case for further release of land from its SIL designation.</p> <p>Over time, investment will be needed in land designated as SIL to ensure it remains fit for purpose. Whilst this is largely the responsibility of landowners (particularly in terms of building stock), opportunities for external funding will be explored in order to support business growth. Recent examples include commitments to improved signage of industrial estates using moneys acquired from the Outer London Fund, and promoting programmes such as the Mayor's broadband</p>		

Modification number	Page number	Policy/ Paragraph number	Proposed change	Justification	Source of change/ representation number
			connection voucher scheme. Over the lifetime of the plan, there may be opportunities for further funding towards other infrastructure improvements such as an enhanced public realm and investment in IT infrastructure ; which will help ensure the area is primed to meet the needs of modern businesses."		
AM25	30	Paragraph 3.3.16	Rephrase last sentence to read: "This should include the use of constant marketing boards at the site, major commercial property listing publications such as Estates Gazette or Property Week, and websites such as www.focusnet.co.uk and www.northlondonbusiness.com "	Factual update	Council

Modification number	Page number	Policy/ Paragraph number	Proposed change	Justification	Source of change/ representation number
AM26	30	Paragraph 3.3.17	<p>At end of paragraph insert:</p> <p>“Our Managed Workspace study (Shared Intelligence, 2013) noted that average rental levels in the borough are £7.50 per square ft for industrial and warehouse uses, and £10 per sq ft for offices. Meanwhile the Evaluation of Blackhorse Lane and Lea Bridge Gateway SIL (URS, 2014) found average industrial rents to be £6.50 per square ft for second hand stock and £10.50 for new build, and average rents of office stock to be £10.60 per square ft for new office stock; and £7.70 per square ft for second hand stock”</p>	Updated to reflect new evidence base	Council



3.4 Neighbourhood Centre and Local Retail Parades

Modification number	Page number	Policy/ Paragraph number	Proposed change	Justification	Source of change/ representation number
AM27	32	Paragraph 3.4.1	Rephrase first sentence to read: “The Tryst Public House and Standard Music Venue have long historically provided a landmark and important community facility, and there is a small concentration of independent retail units on Blackhorse Lane and Forest Road that provide convenience goods.”	Updated to reflect closure of the premises	Council
AM28	33	Policy BHL7a	Rephrase point A (i) to read: "Protecting and enhancing the Neighbourhood Retail Parade at 6-20 Blackhorse Lane and 67-75 Forest Road as shown on the policies map in line with DM Policy 26 25 : Managing Changes of Use in Town Centres, and securing physical improvements to these properties."	Updated to reflect changes to DM Policies numbering and clarify relationship to policies map	Council
AM29	33	Policy BHL7a	Rephrase point A (iv) to read: “Ensuring redevelopment of the Station Hub (Site BHL1) either retains and refurbishes the Tryst Public House and Standard Music Venue for their established	To clarify what options are acceptable in principle	Council

Modification number	Page number	Policy/ Paragraph number	Proposed change	Justification	Source of change/ representation number
			uses,or re-provides a public house capable of hosting live music within the scheme as part of a high quality mixed use development”		
AM30	33	Policy BHL7b	Rephrase first sentence of point B to read: "Outside of the neighbourhood centre, local retail parades at Higham Hill and Billet Road (as shown on the policies map) will be managed in accordance with DM Policy 26 25 : Managing Changes of Use in Town Centres."	Updated to reflect changes to DM Policies numbering and clarify relationship to policies map	Council
AM31	35	Paragraph 3.4.7	Rephrase 1st sentence to read: "Whilst hot food takeaways (Use Class A4 A5) are a recognised town centre use, the Council seeks to avoid their proliferation in the borough."	Typo	Council
AM32	36	Paragraph 3.4.13	Replace 2 nd and 3 rd sentences with: " Although it has since fallen into vacancy and disrepair, when operational, the Tryst Public House and Standard Music Venue were valued community facilities that offered opportunities for social interaction. The new neighbourhood centre should therefore	Updated to reflect the closure of premises and to clarify the need for high quality design	Council

Modification number	Page number	Policy/ Paragraph number	Proposed change	Justification	Source of change/ representation number
			<p>secure their revival or replacement alongside complimentary uses that offer similar ‘social spaces’ such as cafes and restaurants. As the existing building was noted to provide a positive contribution to local character in the Urban Design Framework, any proposals for redevelopment rather than refurbishment will need to be exemplars of design quality; reflecting this prominent location as the focal point of the new neighbourhood centre.”</p>		
AM33	36 - 37	Paragraphs 3.4.14 - 3.4.15	<p>Rephrase to read:</p> <p>“The AAP covers a large geographical area, yet the scale and function of the new neighbourhood centre, as defined in figure 6, means it will have a limited catchment area. It is unlikely that residents in peripheral areas such as Billet Road or Higham Hill Road, will use the neighbourhood centre for their daily top up shopping needs. Because of this, such areas have their own designated Local Retail Parades, as shown in figures 7 and 8. Development Management Policies DM265: Managing Change of Use in Town Centres, sets out our approach to ensure such parades continue to provide a valuable offer to local residents. It is worth noting that the extent of these designations</p>	Updated since vacancies have reduced since June 2011 survey	Council

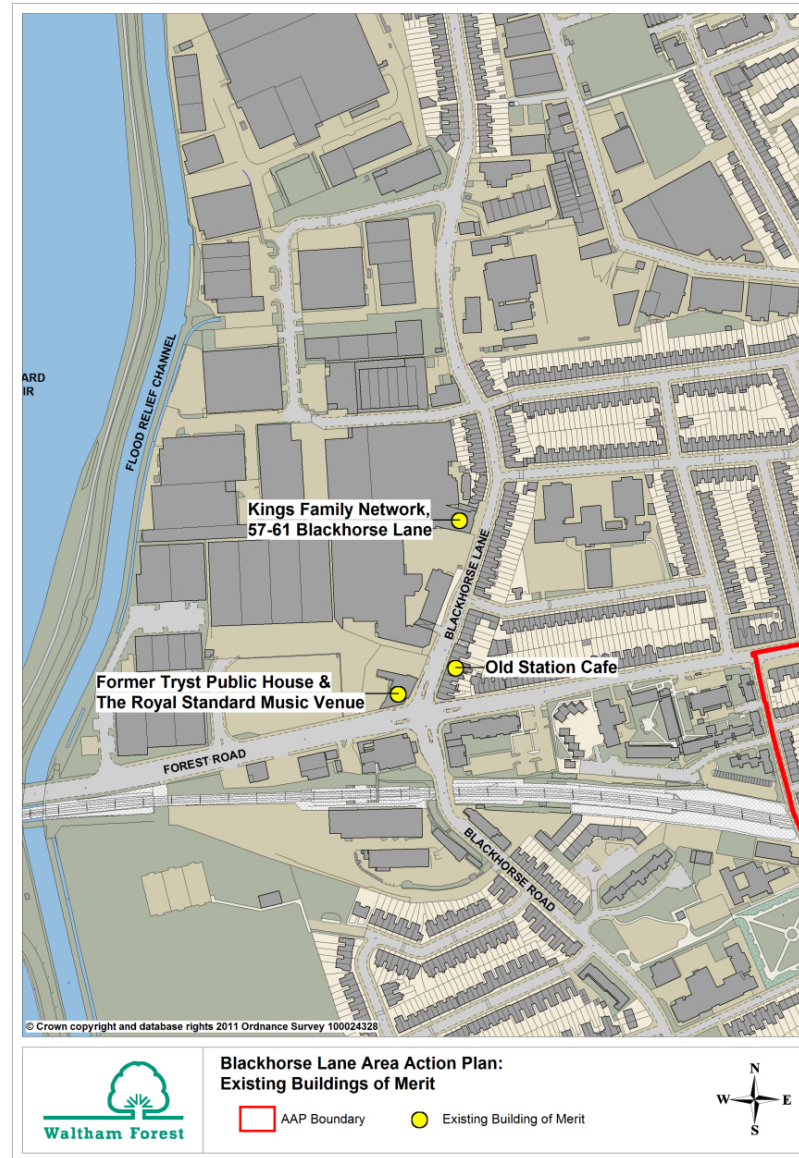
Modification number	Page number	Policy/ Paragraph number	Proposed change	Justification	Source of change/ representation number
			<p>has changed from the old UDP policy. In Billet Road, the parade has been extended to include additional existing commercial units as part of the development proposed at opportunity site BHL7. Conversely, in Higham Hill the extent of the parade has been consolidated in recognition of the dispersed nature of the parade and its high turnover of businesses. This is in response to a survey conducted in June 2011, which found there to be significantly higher levels of vacancy, and a lower proportion of A1 units, than is average for similar types of parades elsewhere in the borough. This is shown in the table below:</p> <p>-</p> <p>(TABLE OF HIGHAM HILL VACANCY RATES)</p> <p>-</p> <p>Consolidating the parade to a smaller area recognises that the health of the parade has been in decline, and assumes that the dispersed nature of the commercial units is a contributing factor. Clustering such uses into a clearly defined area, with a presumption in favour of residential uses outside of the designated parade, can help support the viability of the parade. Such an approach will help increase demand for local</p>		

Modification number	Page number	Policy/ Paragraph number	Proposed change	Justification	Source of change/ representation number
			<p>convenience shopping and thus increase footfall. In addition The Council has invested in the public realm in the form of a corridor scheme that includes pavement widening and removal of street clutter. Subject to the availability of public funding, in the longer term there may be opportunities to further complement this through a shop front improvement scheme. Improvement works to shop fronts and new street lighting are also planned as part of the Council’s regeneration programme, in order to enhance the public realm and investor confidence.</p>		
AM34	37	Paragraph 3.4.16	<p>Rephrase to read:</p> <p>“It is recognised that some existing uses outside the designated parade provide important local facilities not found within the parade (i.e. a post office at number 256, doctor’s surgery at number 260, and a public house – The Warrant Officer, at number 318-372). Their loss to residential should therefore be resisted unless they can be re-provided within the designated parade.”</p>	Update to be consistent with proposed revisions to policy BHL6c	Council

3.5 Design and Local Character

Modification number	Page number	Policy/ Paragraph number	Proposed change	Justification	Source of change/ representation number
AM35	40	Policy BHL8a	Rephrase point A to read: “ensure the highest standard of urban and architectural design which responds positively to local character and context (including the Lee Valley Regional Park) , and secures a high quality public realm, including landscaping ”	Clarity, and consistency with paragraph 3.5.6	Council
AM36	41	Paragraph 3.5.5	At end of paragraph, insert: "To ensure public realm works come forward in a coordinated manner, a Public Realm Masterplan for the Sutherland Road area is being prepared."	Updated to reflect work commissioned since the Proposed Submission was consulted on	Council
AM37	41	Paragraph 3.5.9	Delete final bullet point: <ul style="list-style-type: none"> • The frontage to Gnome House, Hookers Road 	Updated to reflect outcome of recent planning permission	Council

Modification number	Page number	Policy/ Paragraph number	Proposed change	Justification	Source of change/ representation number
AM38	42	Paragraph 3.5.13	Rephrase last sentence to read: "Any proposals that exceed this height will require very strong justification and must be exemplars of design quality, in addition to fully addressing the detailed criteria set out in Development Management Policy DM3231 - Tall Buildings."	Updated to reflect changes to DM Policies numbering	Council
AM39	43	Figure 9	Update map to remove the frontage to Gnome House as shown below	Updated to reflect outcome of recent planning permission	Council



3.6 Public Open Space and Nature Conservation

Modification number	Page number	Policy/ Paragraph number	Proposed change	Justification	Source of change/ representation number
AM40	44	Paragraph 3.6.2	Rephrase opening sentence to read: "Walthamstow Reservoirs, part of the Walthamstow Wetlands project , are an exceptional and extensive blue/green asset adjoining the Blackhorse Lane are."	Clarity	bhllps5
AM41	50	Paragraph 3.6.13	Delete last sentence: "Until superseded by a local Community Infrastructure Levy, funding towards improvements to open space will be captured through the application of the Blackhorse Lane Planning Obligations Strategy SPD."	Updated to reflect progress on CIL	Council
AM42	51	Paragraph 3.6.14	At end of paragraph, insert: "As part of its regeneration programme, the Council is investing in environmental improvements to Higham Hill Recreation Ground."	Factual update	Council

Modification number	Page number	Policy/ Paragraph number	Proposed change	Justification	Source of change/ representation number
AM43	51	Paragraph 3.6.17	<p>Rephrase paragraph to read:</p> <p>“Under the Unitary Development Plan, the area shown in figure 13 was designated as both a playing field and green belt. However, the site was not assessed in our latest playing pitch strategy, and there are no managed or marked playing fields on site. Successive planning permissions for use of parts of the site as amenity space for the adjacent Gypsy and Traveller Site (known as Peacocks Close), and as part of a Muslim burial ground, means that only a small portion of the site is not in active use, and there is no scope for future playing pitch provision. The playing field designation has therefore been removed through the Council’s Development Management Policies DPD; to Removing the playing field designation covering the site therefore overcomes a misleading designation. As no changes are proposed to green belt boundaries, any future applications for use of the site would need to meet the requirements of national green belt policy as set out in the NPPF.”</p>	Factual update	bh\ps59

Modification number	Page number	Policy/ Paragraph number	Proposed change	Justification	Source of change/ representation number
AM44	51	Paragraph 3.6.17	At end of paragraph, insert: "As the site also falls within the Lee Valley Regional Park, any proposals should also conform with the Park Development Framework"	To clarify the wider policy context	bh1ps49
AM45	52	Policy BHL10A (i - iii)	Rephrase to read as follows: "i) securing improved public access to Walthamstow Wetlands; through the provision of a new pedestrian and cycle routes connecting to the Lee Valley Path, and more legible circulation through the site ; and enhanced entry points at the Station Hub , Lockwood Way, Forest Road, and Coppermill Lane. ii) refurbishment of the Marine Engine House to provide an educational resource and centre for learning about nature conservation, the history of the Lee Valley , water sustainability and climate change; a café and toilet facilities; and part of the Coppermill Building as office accommodation and a viewing platform. iii) enhancing the physical appearance of Forest Road as the main gateway into Walthamstow Wetlands; including a new viewing platform to provide views over High Maynard reservoir."	Updated to reflect progress on the Walthamstow Wetlands project	Council

Modification number	Page number	Policy/ Paragraph number	Proposed change	Justification	Source of change/ representation number
AM46	55-56	Paragraphs 3.6.20-3.6.24	<p>Rephrase to read as follows:</p> <p>"Opportunities to enhance public access to Walthamstow Wetlands are cited in our adopted Core Strategy, and the Mayor's Opportunity Area Planning Framework for the Upper Lee Valley and All London Green Grid SPG. The Council has successfully levered in £288,000 of Heritage Lottery Funding to develop detailed plans for the site to RIBA Design Stage D and a subsequent bid of £3.5million will be submitted once detailed studies have been completed. The project has also won the London Planning Awards 2012 under 'best conceptual project' category.</p> <p>To ensure improved public access does not compromise the biodiversity and nature conservation value of the site, or the functional and operational aspects of Walthamstow Reservoirs, a robust access management strategy has been prepared as part of the design process. will be produced as part of the Wetlands project. Sensitive wildlife areas will be screened protected through appropriate mitigation. additional planting, and infrastructure such as boardwalks, screens and hides. Meanwhile, The access management strategy will include measures will be introduced to manage access through the site, for example by introducing low key gates at strategic</p>	Updated to reflect progress on the Walthamstow Wetlands project, and to clarify the importance of the functional role of Walthamstow Reservoirs	Council/ bhlp5

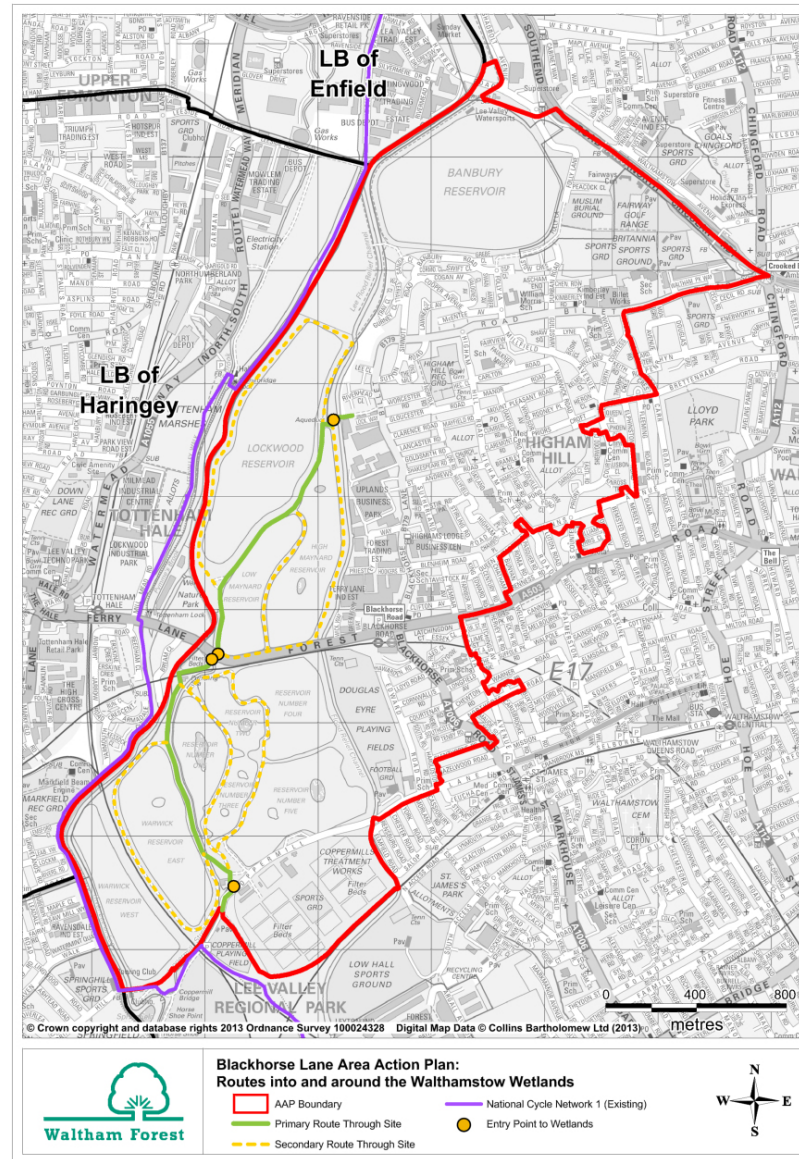
Modification number	Page number	Policy/ Paragraph number	Proposed change	Justification	Source of change/ representation number
			<p>points within the existing pathway network which can be closed during breeding cycles and opened at other times. In addition, the project will secure habitat enhancements will be achieved through plantation of floating reed beds and islands, creation of new fish swims, artificial sand/ earth banks and better management of invasive species such as Japanese knotweed and giant hogweed.</p> <p>Proposals for the Wetlands include an improved and more inviting gateway entrance at Forest Road. Welcoming signage, orientation maps and planting will help make the entrance more attractive. Additional entry points are proposed at Coppermill Lane, and across the Flood Relief Channel at Lockwood Way as shown in figure 15. The primary route through the site will be supplemented by secondary routes that are opened during different seasons, as shown in figure 15. Limiting Managed access and circulation to these key points aims to strike a balance between making the area accessible to surrounding communities, and respecting the functional requirements of the site and its environmental sensitivities, and security of retained industrial areas.</p>		

Modification number	Page number	Policy/ Paragraph number	Proposed change	Justification	Source of change/ representation number
			<p>A new fully DDA compliant cycle and footpath is also proposed through the site from Lockwood Way to Coppermill Lane, linking with the Lea Valley Path and Queen Elizabeth Olympic Park in the Lower Lee Valley.</p> <p>Funding has been committed from the Outer London Fund and the Environment Agency for the 1 kilometre stretch of this cycle path from Lockwood to Forest Road with access to the reservoirs via the existing Environment Agency bridge which will be improved. This forms part of the overall bid for the site to Heritage Lottery funding and is illustrated in figure 15. The purpose of this section of the route is to enable direct access along the eastern boundary of the site to the Station Hub. Additionally there is scope to develop routes through the Wetlands that maximise opportunities for the public to access the natural and industrial heritage of the site. An indicative route is shown on figure 15. The final route will however be subject to the findings of a detailed assessment of impacts on biodiversity and nature conservation.</p> <p>As recommended by the Urban Design Framework, a key feature of redevelopment of the Station Hub and Waterfront (see Section 4: Site BHL1) will be the creation of a linear park and footbridge over the flood relief channel, that will create a new east-west link into</p>		

Modification number	Page number	Policy/ Paragraph number	Proposed change	Justification	Source of change/ representation number
			the Wetlands. The location of the linear park, and an indicative location of the proposed viewing platform this is shown in figure 16. When combined with the new routes through the Wetlands shown in figure 15, this offers major benefits for local residents."		
AM47	57	Figure 15	To be replaced with map shown below providing updated proposals for routes into and around the Wetlands	Updated to reflect progress on the Walthamstow Wetlands project	Council
AM48	58	Figure 16	To be replaced with map shown below updating proposals at the Station Hub	Updated to reflect progress on the Walthamstow Wetlands project	Council
AM49	59	Paragraph 3.6.26	Delete last sentence as shown below: "The Grade 2 Listed Old Coppermill Building is located to the south of the site, close to a proposed entry point at Coppermill Lane. Whilst it currently houses the	Updated to reflect progress on the Walthamstow	Council

Modification number	Page number	Policy/ Paragraph number	Proposed change	Justification	Source of change/ representation number
			Thames Water Health and Safety training facility and an operational store, it is envisaged that the Italianate tower of this building offers scope for use as a viewing platform, offering views across the landscape. It is proposed that part of the building could be used to accommodate the new site staff and provide toilet facilities for visitors."	Wetlands project	
AM50	59	Paragraph 3.6.28	<p>Insert additional sentence to end of paragraph as shown below:</p> <p>"Given the location of the Marine Engine House, Blackhorse Road and Tottenham Hale Stations, Forest Road provides the logical gateway entrance into Walthamstow Wetlands. However, at present, this stretch of road is largely geared towards vehicular traffic and is a somewhat hostile environment for pedestrians and cyclists. To encourage visitors to make sustainable transport choices, the physical environment of this key gateway needs upgrading. The Council will work with Transport for London and London Borough of Haringey to develop a scheme for environmental improvement of the road, including new planting and directional signage. Potential measures are detailed as 'future projects' within the Walthamstow Wetlands Stage C Design Report."</p>	Updated to reflect progress on the Walthamstow Wetlands project	Council

Modification number	Page number	Policy/ Paragraph number	Proposed change	Justification	Source of change/ representation number
AM51	60	Paragraph 3.6.30	<p>At end of paragraph 3.6.30 insert:</p> <p>“The Regional Park Authority’s Park Development Framework contains Proposals for the area of the Park that lies within the Blackhorse Lane area and these are set out in Schedule 1 of this AAP. The Park Development Framework also provides further details of the role and purpose of the Regional Park and Park Authority and can be viewed at http://www.leevalleypark.org.uk/go/pdf”</p> <p>Then insert new schedule 1 to end of document with content as shown below</p>	To clarify the wider policy context	bhllps50/ 54





Park Development Framework Area 3 Proposals - Walthamstow Wetlands and Tottenham Marshes (Adopted April 2013)

Area 3 Proposals relevant to land within the London Borough of Waltham Forest included in the Blackhorse Lane AAP in accordance with the Lee Valley Regional Park Act 1966 (refer to Policy BHL10).

Visitors	Sport & Recreation	Biodiversity	Community	Landscape & Heritage	Environment
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3.A.1	Walthamstow Wetlands	<p>Work in partnership with the London Borough of Waltham Forest, Thames Water and other stakeholders as part of the Walthamstow Wetlands Partnership to create an urban wetland nature reserve and visitors centre at Walthamstow Reservoirs compatible with the sites international and national nature conservation status and its green belt designation. This will include:</p> <ul style="list-style-type: none"> • The provision of public access into and around parts of the site; principally from Forest Road, managed so as to minimise disturbance to the wildlife and habitats whilst providing access to the varied wildlife on site. • A number of secondary pedestrian entrances that will help re-connect the Reservoirs with the adjoining and wider Park area including; <ol style="list-style-type: none"> I. In the south a pedestrian bridge over the Coppermill Stream off from Coppermill Lane, linking through to Walthamstow Marshes, an entrance point at south west corner of Warwick reservoir to link with Springfield Park and the Marshes, II. In the north access from Lockwood Way and Lee Valley Pathway across an existing bridge to the north of High Maynard reservoir and a link through from Tottenham Marshes at the northern end of Lockwood reservoir III. An access point at the southeast corner of High Maynard reservoir connecting through to the station hub at Blackhorse Road. • Access improvements at the low rail bridge over Coppermill Lane to ensure sufficient height for
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		<p>pedestrian and cyclists over Coppermill Lane.</p> <ul style="list-style-type: none"> • Refurbishment of the Thames Water Marine Engine House off Forest Road to create a visitor centre. The new centre to operate as an education resource. Visitor facilities to include a café, toilets and information about the ecology of the reservoirs and the wider area. • Provision of a cycle and pedestrian route from the existing route south of Banbury Reservoir, linking through to Forest Road and Coppermill Lane as a continuation of the Lee Valley Pathway. Options for the route include a pathway through the centre of the reservoirs linking with the new visitor centre and/or a pathway positioned between the Flood Relief Channel and reservoirs on the eastern boundary.
		<p>Support and promote the Fishing Academy introduced on site by Thames Water to develop recreational angling, particularly for young people and disabled people, and associated educational facilities about fish, their environment and angling.</p>
		<p>The Walthamstow Reservoirs to be protected as an open water wildlife habitat of key national and international importance for breeding, wintering and moulting wildfowl. The creation of a new urban wildlife nature reserve to be supported and managed as an integral part of the wider landscape scale ecological resource that includes the Walthamstow Marshes SSSI Nature Reserve and existing facilities and habitats at the Waterworks Nature Reserve in the south and the King George and William Girling Reservoirs SSSI to the north.</p> <p>Support Thames Water in updating the site management plan to improve the reservoirs existing state from 'unfavourable recovering' to 'favourable', as required by Natural England. A detailed assessment of favoured roosting/refuge locations to be undertaken to inform the visitor and access strategy for the Walthamstow Wetlands project.</p>
		<p>Work with London Borough of Waltham Forest, Thames Water, schools throughout the region and other stakeholders to provide an educational resource linked to the sites ecology, its natural and industrial heritage, and water management issues. Facilities and services should complement the learning</p>

		resources at the Waterworks Centre.
		<p>The site's existing landscape character to be protected and enhanced with existing green and attractive edges maintained. The potential to enhance wetland landscape connectivity within and along the boundaries of the site to be explored as part of the site management plan. Views into and across the site to be protected particularly from Ferry Lane/Forest Road. The unattractive and visually harsh edge to the southern boundary of the site to be enhanced to improve the quality of and the entrance to the Regional Park, along Coppermill Lane</p> <p>Heritage assets and features such as the Marine Engine House and the Grade II listed Old Coppermill building to be brought into public use and enhanced to celebrate their historical role in the development of the water industry and to promote the wider heritage of the valley.</p>
		<p>Proposals to develop the reservoirs as an urban wetland nature reserve should take full account of their primary role for water storage. The Authority will support and work with Thames Water and stakeholders to develop management regimes which enhance the sites ecological value, water quality and visitor potential.</p> <p>Explore opportunities with the Walthamstow Wetlands Partnership to link new visitor facilities into proposed decentralised energy networks.</p>

3.A.3	Douglas Eyre	<p>Explore options with landowners and the London Borough of Waltham Forest for the provision of a pedestrian/cycle route alongside the western boundary of playing fields, to form part of the Lee Valley Pathway and National Cycle Network Route 1. Options should include restoring the path under the rail line and connections through to Blackhorse Road Station.</p> <p>Support ongoing improvements to outdoor sporting facilities and investment in all weather football pitches.</p>
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		Engage with sporting organizations such as the London Football Association who operate on site to develop synergies between the sport, training and coach education programmes provided at Douglas Eyre and elsewhere in the Park e.g. Lee Valley Athletics Centre.
		Through new management practices improve biodiversity along the margins of the site, for example by relaxing the mowing regime and taking an annual meadow cut along the edges of the pitches.
		Support ongoing club and community use of sports pitches and associated built facilities.
		Support the enhancement of existing strong landscape character, maintaining the continuity of green links on the eastern side of the valley.
		Support the Environment Agency, the London Borough of Waltham Forest and other stakeholders in improving water quality and biodiversity in the Dagenham Brook and any opportunities to de-culvert and naturalise part of the water course.

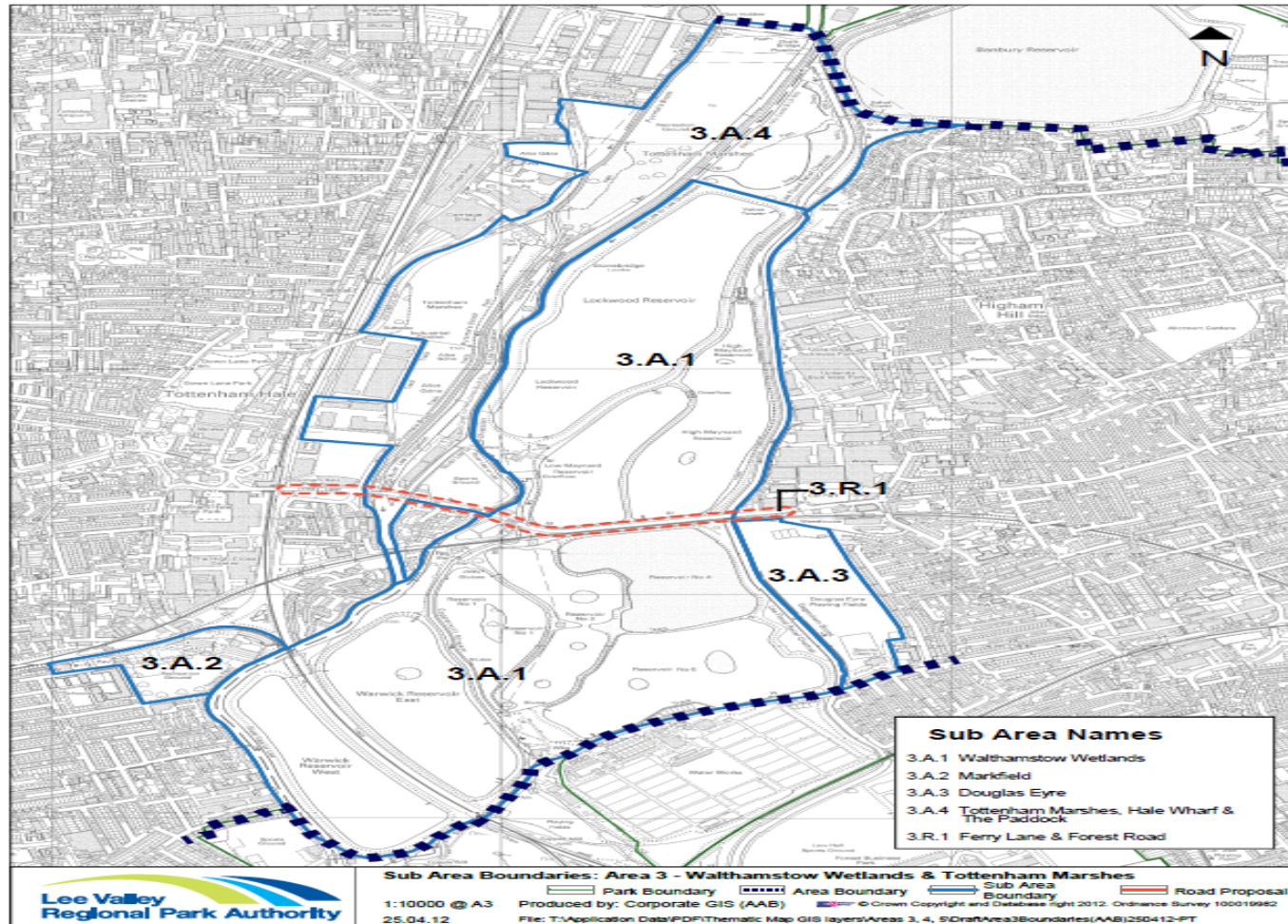
3.A.4	Tottenham Marshes, Hale Wharf & the Paddock <i>Please note only a small part of Area 3.A.4 lies within Waltham</i>	Enhanced visitor hubs to be established at two locations: 1) <u>Stonebridge Lock</u> Stonebridge Lock to be developed as a visitor node based around the existing Waterside Centre. The Authority intends to work with the Canal and River Trust and other stakeholders to establish a café within the Waterside Centre with outdoor seating and improved public realm. Cycle hire facilities for Park visitors to be provided at the Waterside Centre potentially linked to other cycle hubs elsewhere within the Park including where feasible the London hire schemes operated by Transport for London. <i>Enhance pedestrian and cycle routes and the associated environment into Tottenham Marshes from the</i>
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<p>Forest – the majority lies within the London Borough of Haringey. The full proposal is included here however as the Regional Park Proposals cut across borough boundaries and require partnership working to secure delivery. Those relating only to Waltham Forest and the Blackhorse Lane AAP are indicated by a * and text written in italics</p>	<p><i>adjoining communities to the west, building on existing improvements on Watermead Way and at the entrance to Stonebridge Lock. Enhance and promote the southern access into the Marshes from Ferry Lane and along the towpath south of Ferry Lane*.</i></p> <p>Work with TfL and other partners to improve access from Tottenham Hale Station and bus interchange and Hale Village into the Park via an attractive, safe and well signed route.</p> <p>2) <u>Hale Wharf</u></p> <p>Work with the London Borough of Haringey, the Canal and River Trust and other stakeholders to identify options for development on Hale Wharf that will bring this site into a Park compatible leisure use whilst also meeting its designation as a Regeneration Area within the London Borough of Haringey’s Core Strategy. Appropriate uses would include (but are not restricted to) one or more of the following:</p> <ul style="list-style-type: none"> • New recreational or sporting facilities, based on the sites waterside location • Accommodation serving visitors to the Park • Waterside visitor facilities and facilities for clubs with a community emphasis, incorporating leisure uses for example café, cycle and canoe hire/club facilities. <p>The type, scale and design of development would need to be appropriate in terms of the sites location within the heart of the Park adjacent to internationally and nationally important biodiversity sites and its waterside environment.</p> <p><i>Any development of the site would be expected to support and complement existing leisure and nature conservation activity and facilities in the area in particular the Walthamstow Wetlands project. It should also enhance landscape quality and visual permeability, the ecological values of the environment and adjoining waterways and support waterside habitat creation. Design should allow views through the site from the towpath to the reservoirs and wider Park.*</i></p> <p><i>Development on the site should encourage sustainable modes of transport, making full use of the</i></p>
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		<p><i>Tottenham Hale Station and bus interchange, with improved pedestrian and cycle links between this hub, Blackhorse Road station to the east and strategic pedestrian and cycle links within the valley*.</i></p> <p>A new southern gateway into the Regional Park and Tottenham Marshes from Ferry Lane via Hale Wharf and a new pedestrian link across the waterways should form part of the regeneration of Hale Wharf.</p> <p>Development of the site which is not appropriate under the terms of the Park Act 1966 and the Park Authority's remit and does not accord with the proposals set out in the Park Development Framework will be resisted.</p> <p>Work with the Canal and River Trust to ensure existing moorings along the Lee Navigation, especially between Stonebridge Lock and Ferry Lane are rationalized and associated structures removed. Provide practical support where feasible to the Canal and River Trust in their remit to enforce against unauthorized moorings and manage mooring compounds effectively so that they do not detract from the amenity of the Park.</p> <p>Opportunities for a visitor water taxi service to be explored with the Canal and River Trust and other stakeholders.</p>
		<p><i>Support increased recreational use of the waterways*.</i> Work with stakeholders to reinstate canoe/kayak hire facilities at Stonebridge Lock and develop a flat water canoe trail as part of the route between the White Water Centre in Broxbourne and Old Ford in Tower Hamlets.</p> <p>Cycle hire facilities to be developed including facilities for the Lee Valley Cycle Ability Club with adapted bikes available for hire.</p> <p><i>Promote active recreational use of the open spaces, including orienteering, through improved signage and site management. Options to further enhance these spaces for informal recreation and create a high quality waterside park to be explored with stakeholders*.</i></p>

		<p><i>Tottenham Marshes to be protected as an important urban wildlife habitat and nature reserve with further work undertaken to improve biodiversity and enrich the wildlife value. Watercourses that pass through the area and south of Ferry Lane to be safeguarded and enhanced as part of the ecological landscape and to improve wetland connectivity*.</i></p> <p>The potential to redevelop part of Wild Marsh West to provide for flood alleviation whilst enhancing and promoting biodiversity and community access to nature will be explored with the London Boroughs of Enfield and Haringey and local user groups as part of the Meridian Water development</p> <p>The Paddock Community Nature Park to be safeguarded as a local access to nature site. Existing habitats to be protected and enhanced to complement the adjoining Walthamstow Reservoirs. Improvements to the entrance off Ferry Lane to be supported. <i>Opportunities to create a new controlled pedestrian bridge link as part of a nature trail, between The Paddock and Walthamstow Wetlands to be explored.*</i></p>
		<p>Clendish Marsh to be managed for events and local festivals with key stakeholders. Continue to explore and develop volunteer opportunities.</p> <p>Enhanced management of the East Hale Community Allotments to continue.</p>
		<p><i>The good quality of the landscape to be protected and enhanced and improvements undertaken in the southern part of Tottenham Marshes, adjacent to major roads and around allotment boundaries. Views out across the Regional Park to be safeguarded.*</i></p> <p><i>New planting to be located to reduce the visual impact of neighbouring land uses, to provide structure within the area and to enhance the overall environmental quality*.</i></p>
		<p>Management of sustainable food growing at East Hale community allotments to continue. There should be a focus at this site and the Marsh Lane allotments, on initiatives for community led food production where these deliver social and biodiversity benefits, for example Living Under One Sun Community Allotment.</p>

		<p>Work with the Environment Agency and other stakeholders and user groups to improve the biodiversity value of Pymmes Brook through the design and development of naturalised channels. Support work to substantially improve and maintain water quality in accordance with targets set under the Water Framework Directive.</p> <p><i>Work with Canals and River Trust and other stakeholders on options for securing the Lee Navigation as a route for waterborne transport.*</i></p>
<p>3.R.1</p>	<p>Ferry Lane & Forest Road</p>	<p>Work with stakeholders to significantly improve the quality of Ferry Lane and Forest Road as a focus for entry to the Park by:</p> <ul style="list-style-type: none"> • Reducing the impact of the road on the openness of the Park by <ul style="list-style-type: none"> - improving its public realm, - partially removing the wall on the southern side to open up views and - strengthening landscape belts • Creation of a new pedestrian crossing to provide safe access into the main entrance for the Walthamstow Wetlands • Enhancing existing pedestrian and cycle routes adjacent to the road to include pedestrian reserves to facilitate safe access across the road and onto strategic off road routes such as the Lee Valley Pathway • Improving bus services and provision including new bus stops/shelters close to Park entrances • Ensuring access from Blackhorse Road Station into the Park via Forest Road is clearly signed and promoted • Implementing a co-ordinated signage strategy for the road frontage including directional and entrance signage that reflects the range of facilities available.



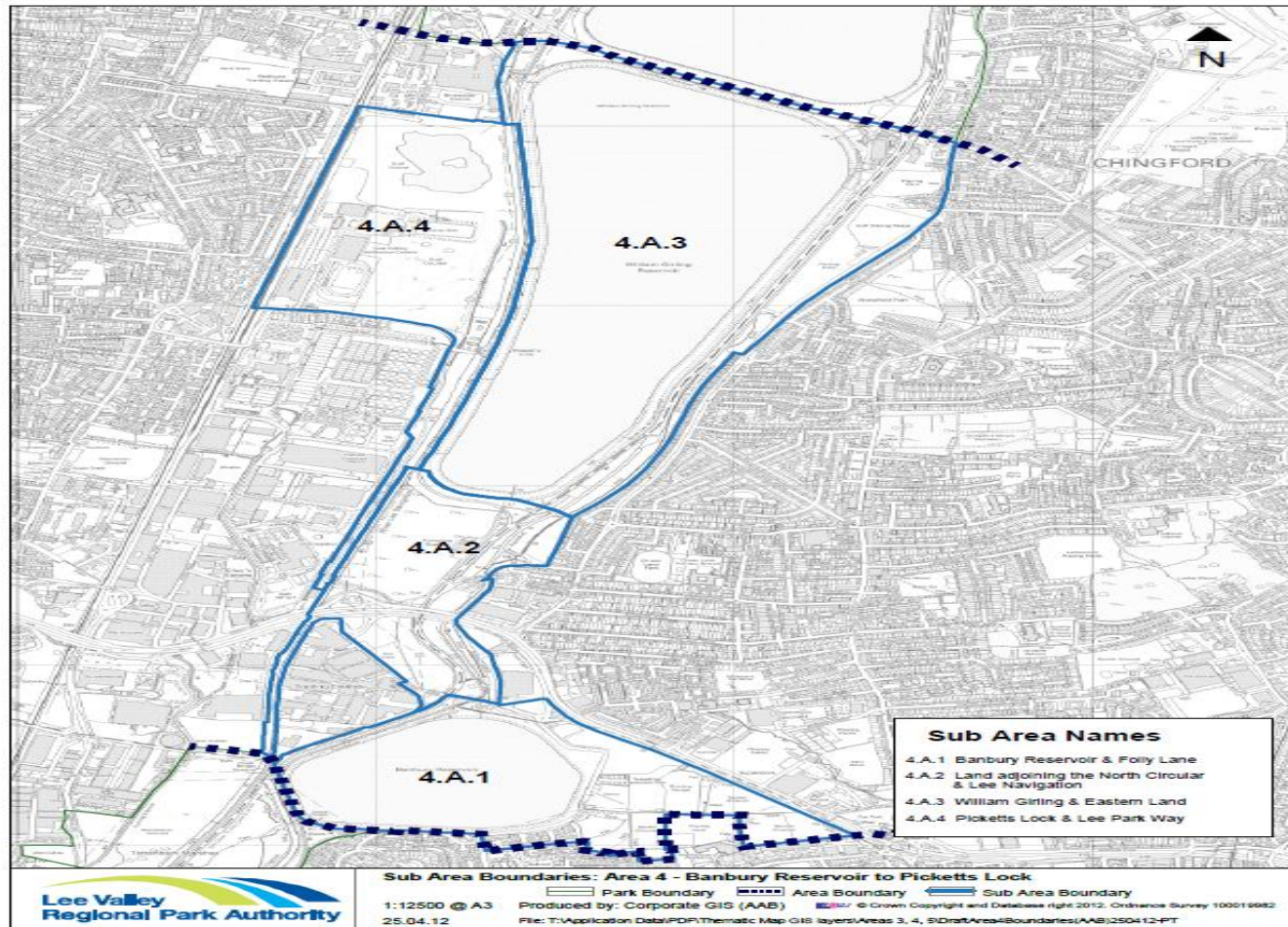
Park Development Framework Area 4 Proposals - Banbury Reservoir to Picketts Lock

Area 4 Proposals relevant to land within the London Borough of Waltham Forest included in the Blackhorse Lane AAP in accordance with the Lee Valley Regional Park Act 1966 (refer to Policy BHL10).

Visitors	Sport & Recreation	Biodiversity	Community	Landscape & Heritage	Environment
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4.A.1	Banbury Reservoir and Folly Lane Triangle	
		<p>Work with the London Boroughs of Enfield and Waltham Forest, Thames Water and other stakeholders to develop a linear waterside park around Banbury Reservoir as part of a new visitor hub. This should include land within Meridian Water and Folly Lane and link through to Tottenham Marshes. Key features of this new waterside park could include:</p> <ul style="list-style-type: none"> • the creation of a naturalised edge to the River Lee Diversion providing opportunities for habitat creation and new recreational routes • new café/restaurant or other facility which complements the Park housed within part of the Greaves Pumping Station; the remainder of the building to be retained for operational purposes • installation of a viewing platform to provide visual access across the reservoir and wider Park area <p>Work with the London Borough of Waltham Forest to provide effective signage and interpretation within Folly Lane Triangle, enhance and improve personal safety along Folly Lane, part of the Lee Valley Pathway and National Cycle Network Route 1 and support improvements to the condition of the Folly Lane Public Footpath a linking route from the east. Enhance and sign entrances into the Park from the south from Billet Road.</p>
		Explore with Thames Water and other stakeholders the use of Banbury Reservoir for watersports; options

		<p>to include sailing and paddle boarding.</p> <p>Work with the London Borough of Waltham Forest and other stakeholders to protect and enhance sporting and outdoor recreational use of land east of Folly Lane. Explore options for a BMX/Scrambler track within the area.</p>
		<p>The existing ecological value of Banbury Reservoir and land adjoining to be protected. Support work by the London Borough of Enfield and stakeholders to create a naturalised edge to the River Lee Diversion and establish new waterside habitats. These should be designed to strengthen the ecological connectivity with existing habitats present within the Park, and to provide for public access to nature where practicable.</p> <p>Support works to improve the ecological interest of land within Folly Lane Triangle and access to nature opportunities, for example, by enhancing woodland and grassland habitat at Cheney Row and the Community Woodland.</p>
		<p>Support the provision of local events space, play areas and fitness trail within Folly Lane at Cheney Row and measures to encourage community use and volunteer activities within the Folly Lane Community Woodland.</p>
		<p>Invest in landscape improvements at the entrance to the Regional Park from the North Circular Road. Improvements to be of a high design quality to strengthen landscape character and the Park's identity. Support work to enhance the boundaries of individual sites east of Folly Lane, particularly around the established Traveller Site and alongside the North Circular.</p>
		<p>The location and management of visitor access around Banbury Reservoir to take account of Thames Water operational requirements.</p> <p>Support Thames Water and the Environment Agency in work to maintain and improve water quality to enhance both ecological values and recreational amenity.</p>



3.7 Flood Risk

Modification number	Page number	Policy/ Paragraph number	Proposed change	Justification	Source of change/ representation number
No modifications	-	-	-	-	-

3.8 Transport

Modification number	Page number	Policy/ Paragraph number	Proposed change	Justification	Source of change/ representation number
AM52	66	Paragraph 3.8.3	Rephrase 3rd sentence to read: "Transport for London are currently investing in the capacity of the Victoria Line, and exploring options for the bus network; including potential extensions of the 76 and 41 service to Blackhorse Road, along with increased frequencies along these routes. "	Updated to reflect TfL programme of works	bh/lps61
AM53	67	Policy BHL12a	Insert new point viii to read: "secure adequate provision for buses and taxis to meet the needs of the proposed development, which may include financial contributions"	To clarify the importance of new developments being well served by public transport	bh/lps61
AM54	68	Paragraph 3.8.5	At end of paragraph insert: "The Council is also exploring options for making the urban area of Walthamstow more cycle friendly through matters such as 20mph hour streets, and better segregation from	Update	Council

Modification number	Page number	Policy/ Paragraph number	Proposed change	Justification	Source of change/ representation number
			traffic, and has been shortlisted for the Mayor's Outer London Transformation 'Mini Holland' Funding."		
AM55	70	Paragraph 3.8.16	At end of paragraph insert: "Detailed feasibility works to inform final designs of the new Standard Junction, following the principles set out above, are now underway."	Update	Council
AM56	71	Paragraph 3.8.18	Delete last sentence: "In the interim period until a local CIL is developed, the existing Annexe to the Planning Obligations SPD will provide the mechanism for collecting funds."	Updated to reflect progress on CIL	Council
AM57	72	Paragraph 3.8.20	Rephrase penultimate sentence to read: "Proposals should therefore meet the requirements of policy DM1647C of our Development Management Policies."	Updated to reflect changes to DM Policies numbering	Council

3.9 Climate Change and Decentralised Energy

Modification number	Page number	Policy/ Paragraph number	Proposed change	Justification	Source of change/ representation number
AM58	73	Policy BHL13	Rephrase policy title to read: "Policy BHL12: Climate Change and Decentralised Energy "	Typo	Council
AM59	73	Policy BHL13	Rephrase policy to read: "A) To ensure proposals in the Blackhorse Lane area minimise carbon emissions, all developments of one or more units or greater than 100sqm should be accompanied by an energy assessment that demonstrates: - how the resource efficiency, the London Plans stepped carbon reduction targets, and high environmental standards set out in Policy DM10 from our Development Management Policies DPD will be met; - how the proposal will connect link in the short to medium term to the planned Blackhorse Lane Cluster, and ultimately the Upper Lee Valley Decentralised Energy Network , Decentralised Energy Network for the Upper Lee Valley (unless this can be demonstrated to be unfeasible or unviable). Where schemes come	To clarify alignment with London Plan requirements, and the opportunity for developments to support a Decentralised Energy Network for the Upper Lee Valley	bhIps60/ Council

Modification number	Page number	Policy/ Paragraph number	Proposed change	Justification	Source of change/ representation number
			<p>forward in advance of any Decentralised Energy Networkthis infrastructure, they should be designed to be 'connection ready', and agree to connect to the proposed network once this is available. Planning conditions will be imposed to that affect.</p> <p>B) The Council will work with landowners to secure the delivery of new energy centres that serve clusters of development at the Station Hub and Sutherland Road, as part of the Upper Lee Valley Decentralised Energy Network. Where a landowner provides an energy centre capable of also powering neighbouring sites, any loss of developable area will be reflected in the s106 agreement.</p> <p>C) Where it has been demonstrated that it is not feasible or viable to connect to the Blackhorse Lane Cluster or Upper Lee Valley Decentralised Energy Network, a sitewide CHP network should be provided, or failing that, communal heating and cooling. In these cases sites should be served from a single energy centre, unless evidence is presented to demonstrate that this is not feasible. Furthermore, they should also be designed to be connection ready so the opportunity to link to the planned energy network once it has been implemented is not lost."</p>		

Modification number	Page number	Policy/ Paragraph number	Proposed change	Justification	Source of change/ representation number
AM60	74	Paragraph 3.9.6	Rephrase last sentence of paragraph to read: "The standards that we will apply to new development proposals are already established in Policy DM1044 of our Development Management Policies, and will apply to sites in Blackhorse Lane as they would the rest of the borough."	Updated to reflect changes to DM Policies numbering	Council
AM61	74	Paragraph 3.9.9	At end of paragraph 3.9.9 insert " ; potentially south to the Northern Olympic Fringe and the Olympic Park. "	Clarity	bhlps60
AM62	74	Paragraph 3.9.10	Rephrase to read: "Feasibility work carried out by Parsons Brinckerhoff (2012) has identified Blackhorse Lane as an area offering potential for a satellite scheme. Whilst this did not confirm Eexact locations are yet to be confirmed, but for such a scheme, it highlighted key considerations will include as: <ul style="list-style-type: none"> • proximity to the proposed network route • visual impact and neighbour amenity • access for maintenance Building on the Parsons Brinckerhoff Study, further analysis of the opportunity in the area is underway, which has highlighted the Station Hub and	To be consistent with modifications to Policy BHL13 and reflect updated evidence base	Council

Modification number	Page number	Policy/ Paragraph number	Proposed change	Justification	Source of change/ representation number
			<p>Sutherland Road areas of the AAP as key opportunities due to the heat load planned developments would generate, their proximity to the proposed network route, and the size of opportunity sites.</p> <p>Providing communal heating networks on site and between sites can help developers achieve carbon reduction targets required in the London Plan and the Councils Development Management Policies DPD. Economies of scale can be achieved through energy centres that provide for clusters of development rather than individual energy centres on separate development parcels. However, it is recognised that where a developer provides an energy centre that is of sufficient capacity to power a cluster of developments rather than just their own, this could result in a loss of developable area; which would need to be mitigated through any s106 agreement, informed by a viability assessment. Feasibility work indicates that as a broad guide, energy centres capable of powering multiple developments in the area could be in the region of 200-300m² in size. Furthermore, it may be possible for such centres to be located within the basements</p>		

Modification number	Page number	Policy/ Paragraph number	Proposed change	Justification	Source of change/ representation number
			of developments (subject to access and flue arrangements); which would minimise loss of developable area."		
AM63	74	Paragraph 3.9.11	Rephrase to read: "Where Decentralised Energy is proposed, infrastructure should be designed in line with district heating best practice. The Greater London Authority has is currently developing a 'Decentralised Energy Manual', which is expected to be complete in early 2013. Once in place, new developments should comply with, both in terms of the principles and standards. set out in this manual. "	Update	bh/lps60

3.10 Social Infrastructure

Modification number	Page number	Policy/ Paragraph number	Proposed change	Justification	Source of change/ representation number
AM64	76	Policy BHL14c	Rephrase to read: <p>“The Tryst Public House and Standard Music Venue will be retained or re-provided and brought back into active use as part of the redevelopment of site BHL1 (see Section 4: Opportunity Sites), as an important social facility;”</p>	To ensure consistent with proposed revisions to policy BHL6	Council
AM65	77	Paragraph 3.10.6	Rephrase to read: <p>"Schools in the area are already operating at capacity, whilst improving, the borough's educational attainment lags behind other London boroughs. New high quality education facilities will be important in supporting the raising of educational standards attainment and attracting aspirational families to the area who are looking for excellent learning experiences for their children. We have purchased Site BHL2 South (see section 4: Opportunity Sites) and funding has been secured for the development of a new secondary school to meet existing demand as schools in the area are already operating at capacity. Beyond this, projected levels of growth are anticipated to result in a need for a further 707</p>	To reflect updated school places projections and ensure consistency with proposed revisions to opportunity site BHL3	Council

Modification number	Page number	Policy/ Paragraph number	Proposed change	Justification	Source of change/ representation number
			621 primary school places and 505 443 secondary school places. Site BHL3 is therefore also earmarked for education use as a new primary school. "		
AM66	77	Paragraph 3.10.8	Rephrase to read: "As set out in the sections on the new neighbourhood centre, and design and local character, the Former Tryst Public House and Standard Music Venue is recognised to be an asset to the area. Through redevelopment, we will therefore require that this is brought back into use as a Development proposals will therefore be required to secure the provision of a public house and music venue capable of hosting live music, in order to help provide opportunities for social interaction and foster a sense of community."	To ensure consistent with proposed revisions to policy BHL6	Council

4 Opportunity Sites

4.1 Introduction

Modification number	Page number	Policy/ Paragraph number	Proposed change	Justification	Source of change/ representation number
AM67	79	Paragraph 4.1.2	Rephrase first sentence to read: “The section sets out our aspirations for these sites, based on what we think is an appropriate and viable use of land that and can secure regeneration benefits for the wider area.”	Typo	Council
AM68	80	Paragraph 4.1.9	Rephrase last sentence of paragraph to read: "For example whilst no specific reference to water infrastructure has been made in the AAP, Policy DM3534: Water, from the Development Management Policies, will be an important consideration in terms of ensuring the development of opportunity sites are supported by adequate infrastructure."	Updated to reflect changes to DM Policies numbering	Council

Modification number	Page number	Policy/ Paragraph number	Proposed change	Justification	Source of change/ representation number
AM69	80	Paragraph 4.1.11	Rephrase last sentence of the paragraph to read: "Development Management Policy DM2524: Environmental Protection will apply to any proposals for redevelopment of the site, which will ensure that the site is cleaned up and risk to water quality is reduced."	Updated to reflect changes to DM Policies numbering	Council

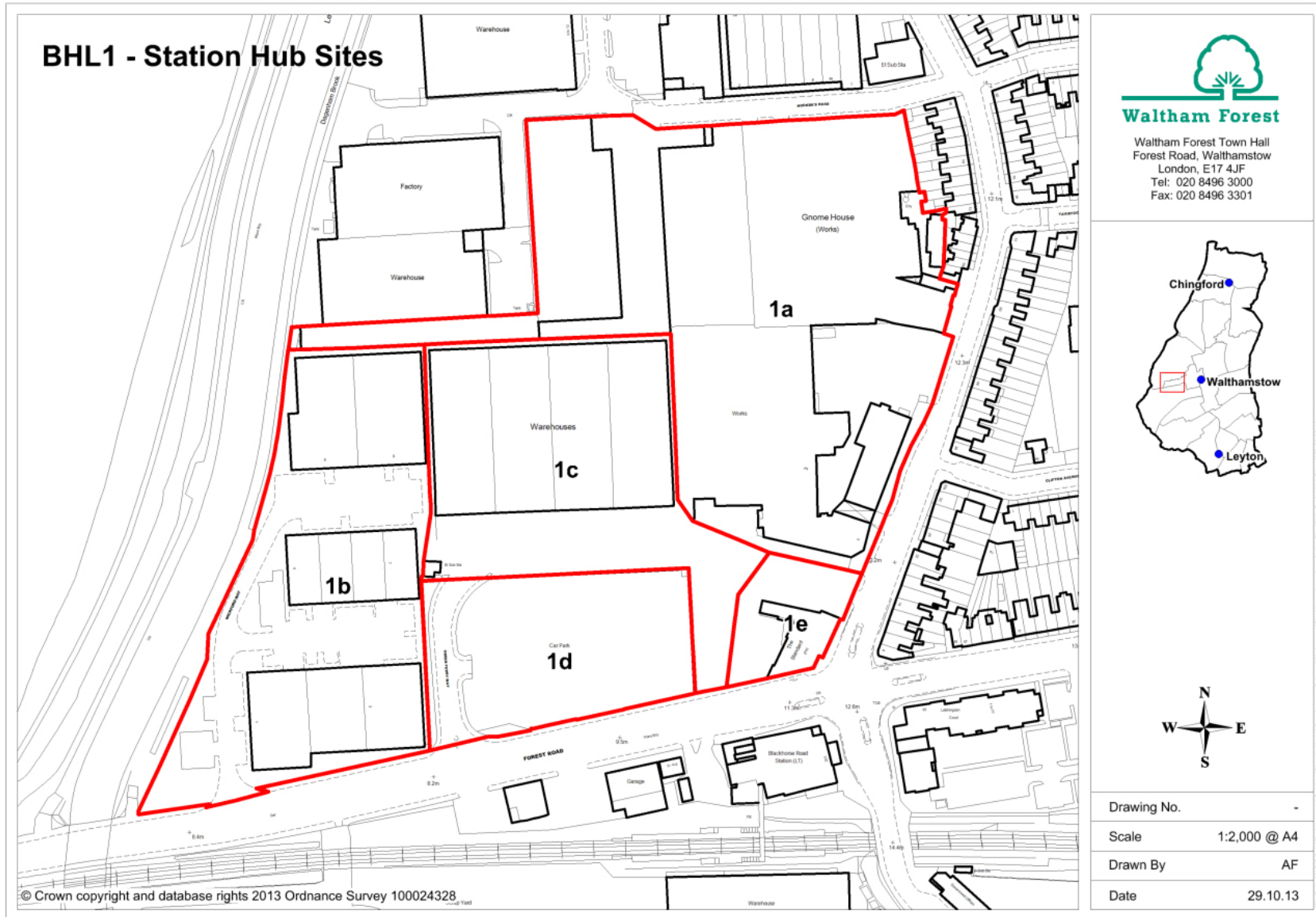
4.2 Site BHL1 - Station Hub and Waterfront

Modification number	Page number	Policy/ Paragraph number	Proposed change	Justification	Source of change/ representation number
AM70	83	Issues/ Opportunities - Neighbourhood Centre	Replace 2 nd sentence with: "As a prominent central site close to the train station, an opportunity exists to provide a core of activity in the form of a new neighbourhood centre through use of ground floors for convenience shopping, a retained or replaced public house and music venue, new restaurants and cafes (potentially with internal courtyards	For consistency with proposed changes to BHL7a	Council

Modification number	Page number	Policy/ Paragraph number	Proposed change	Justification	Source of change/ representation number
			as shared public space), and social infrastructure, to compliment existing retail units in the vicinity.”		
AM71	83	Preferred land use	Revise first paragraph to read: "Mixed use, incorporating approximately 11404000 new homes and approximately 67804550 m ² of commercial space (including retail, B1 business space, and social infrastructure), a new linear park, and public open spaces, and 519 rooms of student accommodation. "	Updated to reflect progress on some phases of the site	Council
AM72	83	Preferred land use	Rephrase title to read: "Preferred Proposed land use"	Updated to reflect the documents status as submission version	Council
AM73	84	Issues/ Opportunities - Housing	At end of paragraph insert: “The size and locational benefits of the site means that there is scope for some purpose built student accommodation. As a substantial amount has now been approved	For consistency with proposed changes to Policy BHL2	bh\ps20/ 22/ 25

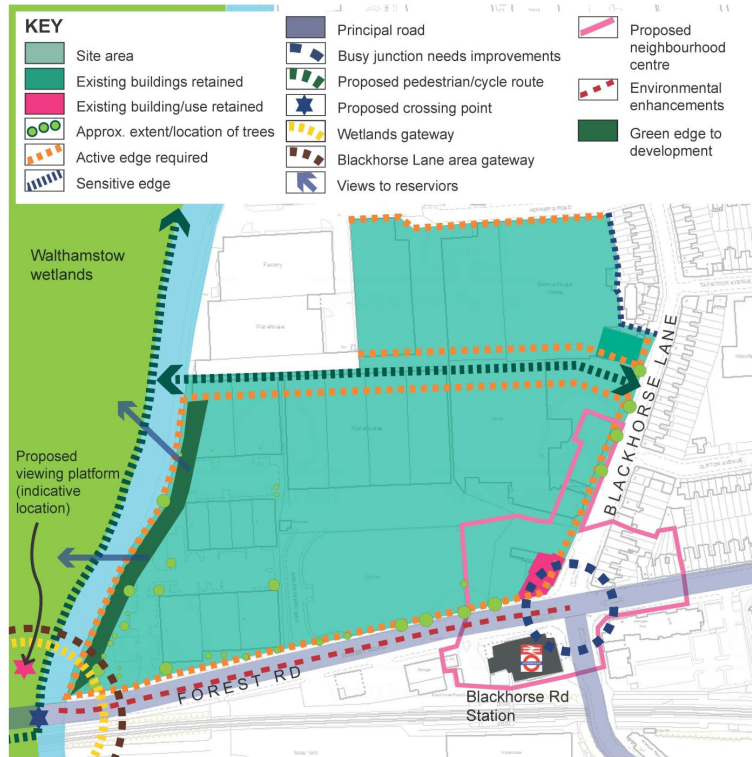
Modification number	Page number	Policy/ Paragraph number	Proposed change	Justification	Source of change/ representation number
			on part of the site, additional provision is unlikely to be supported under the terms of Policy BHL2.”		
AM74	84	Issues/ Opportunities	<p>Insert new point to read:</p> <p>"Decentralised Energy:</p> <p>The size and location of the site, and scale of development planned offers opportunities for the incorporation of a new energy centre to serve multiple development phases as part of the wider Upper Lee Valley Decentralised Energy Network. This is in addition to the two energy centres already approved to serve the first phase of development, which will be 'connection ready' to the wider network. Given the prominent location of the site, the incorporation of an energy centre will need to be sensitively incorporated so it does not undermine opportunities for a high quality design at this gateway location."</p>	For consistency with proposed changes to Policy BHL13, and to conform with the Council's Statement of Common Ground with Hollivale Blackhorse Lane LLP	Council
AM75	86	Issues/ Opportunities -	At end of first paragraph insert: "The need to provide a setback from the flood relief	To clarify interrelationship with	Council

Modification number	Page number	Policy/ Paragraph number	Proposed change	Justification	Source of change/ representation number
		Walthamstow Wetlands	channel and Dagenham Brook offers an opportunity to provide a green edge to the development."	Walthamstow Wetlands project	
AM76	87	Issues/ Opportunities - Land ownership	At the end of paragraph insert: "A plan is provided below showing the extent of different land parcels covering the site. In section 5.3 of the AAP, an indication is provided of how the headline figures for the Station Hub is broken down across these different land parcels." And insert plan as shown below	Clarity	Council
AM77	88	Figure 21	Update map as shown below	Update	Council



BHL1

Station hub and waterfront



4.3 Site BHL2 North - Car Wash & Garage Site

Modification number	Page number	Policy/ Paragraph number	Proposed change	Justification	Source of change/ representation number
AM78	89	Preferred Land Use	Rephrase to read: “Mixed use with ground floor commercial units and/ or social infrastructure (approximately 1500m ²) with approximately 50 residential units above. It is likely that residential uses are restricted to upper floors to achieve satisfactory residential amenity given proximity to the rail line and a major road. ”	To clarify design considerations	Council
AM79	89	Preferred land use	Rephrase title to read: " Preferred Proposed land use"	Updated to reflect the documents status as submission version	Council

4.4 Site BHL2 South - Blackhorse Road/ Hawarden Road

Modification number	Page number	Policy/ Paragraph number	Proposed change	Justification	Source of change/ representation number
AM80	93	Preferred land use	Rephrase title to read: " Preferred Proposed land use"	Updated to reflect the documents status as submission version	Council
AM81	93	Issues/ Opportunities - Access	Rephrase 1st paragraph to read: "Access to the site is perceived as a challenge to development as Blackhorse Road becomes congested at times, and access from Hawarden Road would require vehicles to pass through residential streets. Proposals should therefore be accompanied by a school travel plan and transport assessment. This should consider the effects of the proposal on bus capacity and make provision to enhance capacity to meet additional demand. Care would also be needed to ensure the operational requirements of the station are not compromised."	To clarify the importance of public transport serving the site in accordance with policy BHL12	bhlp62

Modification number	Page number	Policy/ Paragraph number	Proposed change	Justification	Source of change/ representation number
AM82	94	Issues/ Opportunities - Prominent location	Rephrase to read: “The Blackhorse Road edge of the site is in a prominent location and distance views can be taken across the playing fields. Any buildings edging these locations should therefore be of the highest quality of design. Opportunities to exploit views south west across Douglas Eyre Playing Fields, Walthamstow Wetlands, and towards the city, should also be considered. Any temporary permissions should achieve a good visual appearance along the Blackhorse Road frontage to ensure they do not discourage further investment in the area.”	Sustainability Appraisal recommendation	Council/ Sustainability Appraisal

4.5 Site BHL3 - Willowfield School, Tavistock Avenue

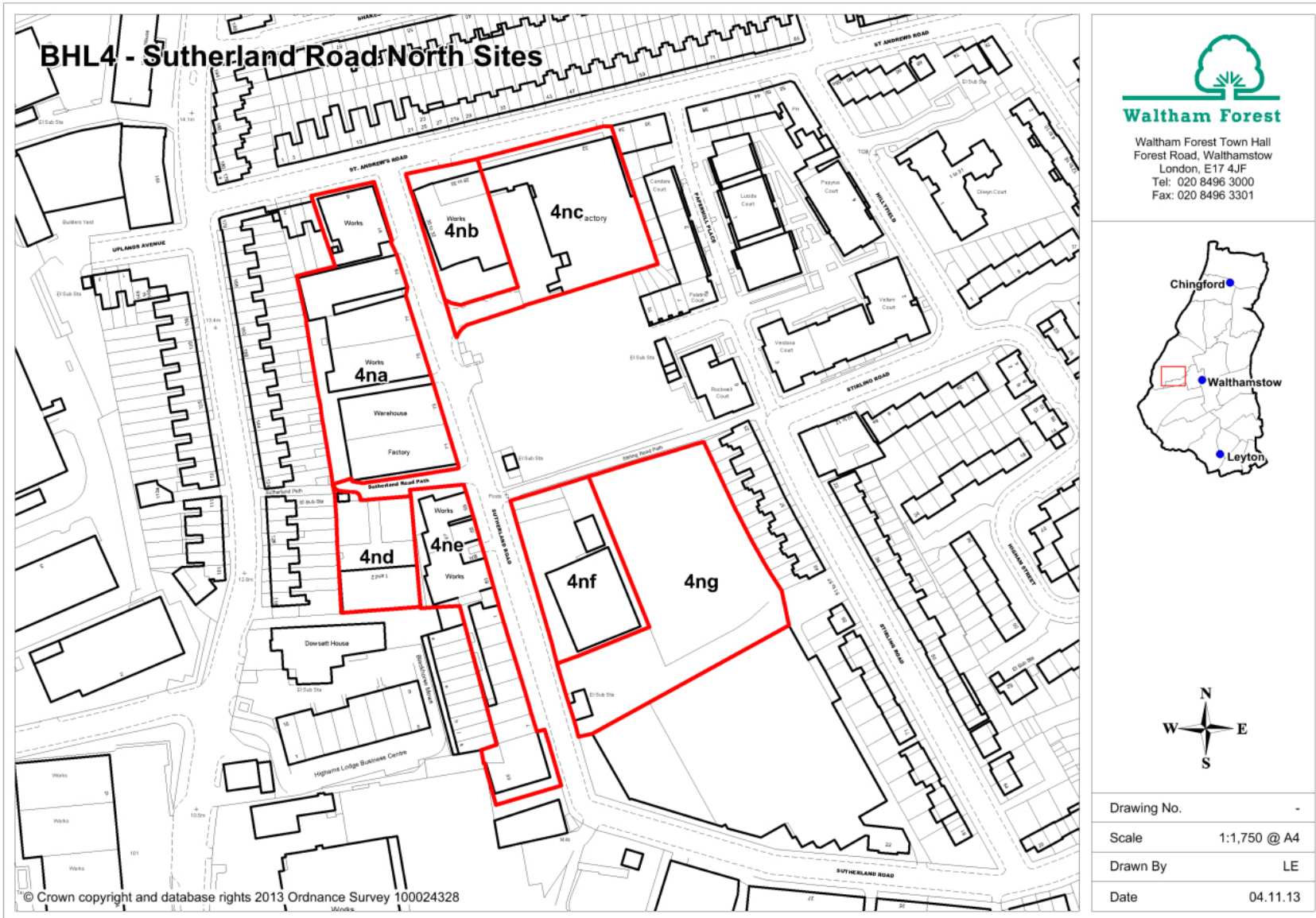
Modification number	Page number	Policy/ Paragraph number	Proposed change	Justification	Source of change/ representation number
AM83	98	Preferred land use	Rephrase title to read: " Preferred Proposed land use"	Updated to reflect the documents status as submission version	Council
AM84	98	Preferred land use	Rephrase to read: " Primary school education for 4 forms of entry Education "	Updated to provide greater flexibility for a range of education uses on site	Council

4.6 Site BHL4 North - Sutherland Road

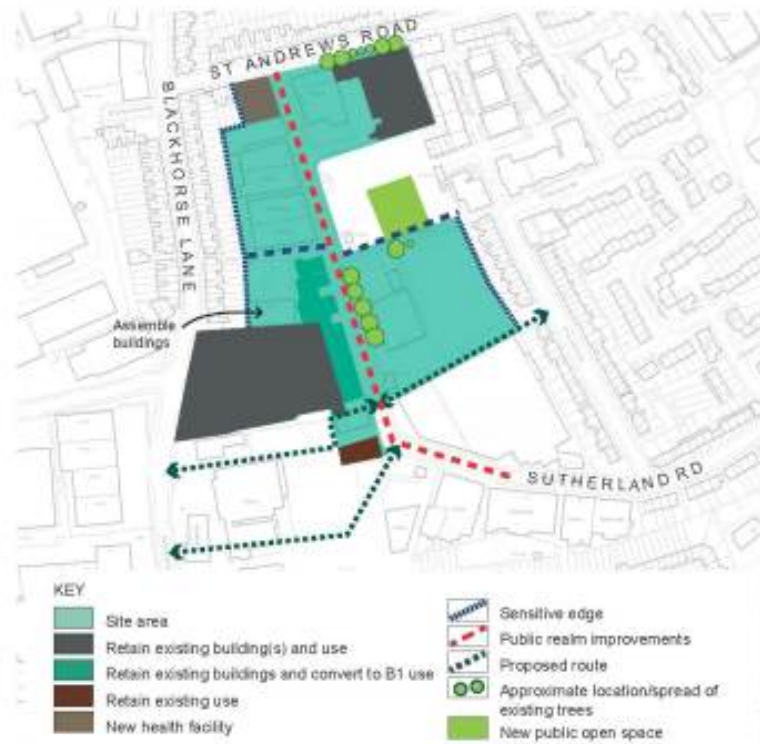
Modification number	Page number	Policy/ Paragraph number	Proposed change	Justification	Source of change/ representation number
AM85	100	Preferred land use	Rephrase to read: "Mixed use including approximately 160450 residential units, 28502000 m ² new/ refurbished B1 business space, 300m² new retail space and a new D1 health centre "	Updated to reflect progress on some phases of the site	Council
AM86	100	Preferred land use	Rephrase title to read: " Preferred Proposed land use"	Updated to reflect the documents status as submission version	Council
AM87	101	Issues/ Opportunities - Employment	Rephrase first paragraph to read: "The site is currently home to a number of employers and is designated as a Borough Employment Area in our adopted Core Strategy. Some units, such as Dunhills, provide valuable employment for skilled craftsman and operate with minimal disturbance to the surrounding area. Others, such as meat processing units, are less compatible with emerging residential developments, but do offer scope for refurbishment	To clarify vision for the area as a creative hub	bhIps58

Modification number	Page number	Policy/ Paragraph number	Proposed change	Justification	Source of change/ representation number
			and re-use as B1 units for creative industries to form a cluster of such activities alongside the Assemble Workshops project and Blackhorse Lane Studios. B1 uses are by their nature more compatible with surrounding residential in terms of less noise, dust and fumes, and can reduce requirements for untidy outside storage of pallets and waste."		
AM88	101	Issues/ Opportunities	<p>Insert new point:</p> <p>"Decentralised Energy:</p> <p>Planned developments in the Sutherland Road area are anticipated to provide sufficient heat demand for the creation of a satellite network as part of the wider Upper Lee Valley Decentralised Energy Network, which would be supplied from its own local energy centre. Opportunities to secure a new centre in the area will therefore be explored as individual development proposals come forward. The visual impact of any such centre will be an important consideration in the design process, in addition to other local environmental aspects."</p>	For consistency with proposed changes to Policy BHL13	Council

Modification number	Page number	Policy/ Paragraph number	Proposed change	Justification	Source of change/ representation number
AM89	102	Issues/ Opportunities - Public Realm	Rephrase 2nd sentence to read: "Proposals in the area should seek to incorporate an attractive public realm including amenity space and street trees in accordance with the Urban Design Framework and the Sutherland Road Public Realm Masterplan , and complimenting interventions to be made using the Outer London Fund."	Updated to reflect work commissioned since the Proposed Submission was consulted on	Council
AM90	102	Issues/ Opportunities -Land Ownership	At the end of paragraph insert: "A plan is provided below showing the extent of different land parcels covering the site. In section 5.3 of the AAP, an indication is provided of how the headline figures for Sutherland Road South is broken down across these different land parcels" And insert plan as shown below	Clarity	Council
AM91	103	Figure 25	Update map as shown below	Update	Council



BHL4 North
Sutherland Road



4.7 Site BHL4 South - Sutherland Road

Modification number	Page number	Policy/ Paragraph number	Proposed change	Justification	Source of change/ representation number
AM92	104	Preferred land use	Rephrase to read: "A mixed use development with 19402700m² B1 use, 140m² retail space , approximately 200 residential units above , and retained community uses."	To offer greater flexibility in terms of the configuration of sites so proposals can better meet the operational needs of businesses. Figures also updated to reflect the impact of Unity Works permission (which had not been accounted for in previous draft)	bh\ps26/ Council
AM93	104	Preferred land use	Rephrase title to read: " Preferred Proposed land use"	Updated to reflect the documents status as submission version	Council
AM94	105	Issues/ Opportunities - Public realm/ access	At end of section insert " A Public Realm Masterplan for the Sutherland Road Area is being prepared. "	Updated to reflect work commissioned since the Proposed Submission was consulted on	Council
AM95	106	Issues/ Opportunities	Insert new point: " Decentralised Energy:	For consistency with proposed changes to Policy BHL13	Council

Modification number	Page number	Policy/ Paragraph number	Proposed change	Justification	Source of change/ representation number
			<p>Planned developments in the Sutherland Road area are anticipated to provide sufficient heat demand for the creation of a satellite network as part of the wider Upper Lee Valley Decentralised Energy Network, which would be supplied from its own local energy centre.</p> <p>Opportunities to secure a new centre in the area will therefore be explored as individual development proposals come forward. The visual impact of any such centre will be an important consideration in the design process, in addition to other local environmental aspects."</p>		

Modification number	Page number	Policy/ Paragraph number	Proposed change	Justification	Source of change/ representation number
AM96	106	Issues/ Opportunities	<p>Add new point - "Land ownership: The site includes a range of land ownership parcels. "A plan is provided below showing the extent of these. In section 5.3 of the AAP, an indication is provided of how the headline figures for Sutherland Road South is broken down across these different land parcels."</p> <p>And insert plan as shown below</p>	Clarity	Council



Waltham Forest Town Hall
 Forest Road, Walthamstow
 London, E17 4JF
 Tel: 020 8496 3000
 Fax: 020 8496 3301



Drawing No.	-
Scale	1:1,000 @ A4
Drawn By	AF
Date	29.10.13

File Path: M:\GIS Data\Environmental Services\Planning\Local Development Scheme\Waltham Forest\Blackhorse Lane Area\Adopt Plan\BHL4 - Blackhorse Lane AAP Additional Minor Modifications.dwg

4.8 Site BHL5 - Papermill Place

Modification number	Page number	Policy/ Paragraph number	Proposed change	Justification	Source of change/ representation number
AM97	108	Preferred land use	Rephrase title to read: " Preferred Proposed land use"	Updated to reflect the documents status as submission version	Council

4.9 Site BHL6 - Webb's Industrial Estate

Modification number	Page number	Policy/ Paragraph number	Proposed change	Justification	Source of change/ representation number
AM98	110	Preferred land use	Rephrase title to read: " Preferred Proposed land use"	Updated to reflect the documents status as submission version	Council
AM99	110	Issues/ opportunities - permeability	Rephrase first sentence to read: "Situated between Blackhorse Road station and existing and emerging residential communities to the north east, the site offers an opportunity for improved public	Updated to reflect work commissioned since the Proposed Submission was consulted on	Council

Modification number	Page number	Policy/ Paragraph number	Proposed change	Justification	Source of change/ representation number
			<p>realm and permeability in the area through the introduction of new east-west links in accordance with the Sutherland Road Public Realm Masterplan."</p>		
AM100	110	Issues/ Opportunities	<p>Insert new point:</p> <p>"Decentralised Energy:</p> <p>Planned developments in the Sutherland Road area are anticipated to provide sufficient heat demand for the creation of a satellite network as part of the wider Upper Lee Valley Decentralised Energy Network, which would be supplied from its own local energy centre.</p> <p>Opportunities to secure a new centre in the area will therefore be explored as individual development proposals come forward. The visual impact of any such centre will be an important consideration in the design process, in addition to other local environmental aspects."</p>	For consistency with proposed changes to Policy BHL13	Council

4.10 Site BHL7 - Billet Works

Modification number	Page number	Policy/ Paragraph number	Proposed change	Justification	Source of change/ representation number
AM101	113	Planning history	At end of section, insert: “2013 – permission for mixed use development including 349 residential units, 792m2 retail (A1-A3), 874m2 office floorspace (B1), and 444m2 community space and crèche (D1), 271 car parking spaces, 710 cycle spaces, modified access and provision of amenity space”	Factual update	Council
AM102	113	Preferred land use	Rephrase title to read: "PreferredProposedland use"	Updated to reflect the documents status as submission version	Council

4.11 Site BHL8 - 152/154 Blackhorse Road

Modification number	Page number	Policy/ Paragraph number	Proposed change	Justification	Source of change/ representation number
AM103	116	Preferred land use	Rephrase title to read: " Preferred Proposed land use"	Updated to reflect the documents status as submission version	Council

4.12 Site BHL9 - Former Essex Arms Public House

Modification number	Page number	Policy/ Paragraph number	Proposed change	Justification	Source of change/ representation number
AM104	119	Preferred land use	Rephrase title to read: " Preferred Proposed land use"	Updated to reflect the documents status as submission version	Council

4.13 Site BHL10 - Marine Engine House

Modification number	Page number	Policy/ Paragraph number	Proposed change	Justification	Source of change/ representation number
AM105	120	Preferred land use	Rephrase title to read: " Preferred Proposed land use"	Updated to reflect the documents status as submission version	Council
AM106	121	Issues/ Opportunities - Preferred land use	Rephrase to read: "To provide a visitor centre for Walthamstow Wetlands, including an education space for school visits from across London, a flexible exhibition space (for community use, seminars and promote learning about nature conservation, the history of the Lee Valley , the supply of water to cities and impacts of climate change on water resources), and a cafe with toilet facilities."	Updated to reflect progress on the Walthamstow Wetlands project	Council

Modification number	Page number	Policy/ Paragraph number	Proposed change	Justification	Source of change/ representation number
AM107	122	Issues/ Opportunities - Parking	Rephrase to read: "Approximately 100 car parking spaces currently exist on associated land, which is generous given the accessibility of the site by train, tube, foot and cycle; and the need to ensure development is sensitive to the nature conservation value of the area. No increase in car parking is therefore proposed, but DDA compliant spaces will be introduced. "	Updated to reflect progress on the Walthamstow Wetlands project	Council

4.14 Site BHL11 - Old Coppermill

Modification number	Page number	Policy/ Paragraph number	Proposed change	Justification	Source of change/ representation number
AM108	124	Preferred land use	Rephrase title to read: " Preferred Proposed land use"	Updated to reflect the documents status as submission version	Council

Modification number	Page number	Policy/ Paragraph number	Proposed change	Justification	Source of change/ representation number
AM109	124	Issues/ Opportunities - Preferred land use	Rephrase to read: "It is anticipated that this will largely remain a Thames Water training facility and operational store, however a partial conversion is proposed could provide some community facilities. These may include a viewing platform in the Italianate tower and related interpretation and the provision of toilet facilities and cafe."	Updated to reflect progress on the Walthamstow Wetlands project	Council
AM110	125	Issues/ Opportunities - Grade II listed	Rephrase to read: "In particular, the Italianate building tower offers potential for conversion into a viewing platform that exploits views across the landscape. Further opportunities include the provision of toilet facilities and a cafe. In the event that the building is no longer needed for Thames Water's operational use, an opportunity exists to re-use the building as a further visitor hub in keeping with the concept of the Wetlands project. "	Updated to reflect progress on the Walthamstow Wetlands project	Council

4.15 Discounted sites

Modification number	Page number	Policy/ Paragraph number	Proposed change	Justification	Source of change/ representation number
No modifications	-	-	-	-	-

5 Implementation

5.1 Introduction

Modification number	Page number	Policy/ Paragraph number	Proposed change	Justification	Source of change/ representation number
AM111	130	Paragraphs 5.1.3-5.1.6	<p>Rephrase to read:</p> <p>"At present, section 106 funding is pooled from new developments through</p> <p>the Blackhorse Lane Planning Obligations Strategy SPD (adopted February 2009). This has been prepared on the basis that planning obligations should be:</p> <ul style="list-style-type: none"> - necessary to make the development acceptable in planning terms; - directly related to the development; and, - fairly and reasonably related in scale and kind to the development. <p>However, Changes in legislation and the introduction of the Community Infrastructure Levy Regulations (2010) (as amended) mean that in the future by April 2014, section 106</p>	Updated to reflect progress on CIL	Council

Modification number	Page number	Policy/ Paragraph number	Proposed change	Justification	Source of change/ representation number
			<p>funds</p> <p>can only be pooled from a maximum of 5 developments, or to provide affordable housing. The Council has therefore developed a borough wide Community Infrastructure Levy (CIL) charging schedule To pool resources from several developments to fund local infrastructure such as transport improvements or new education facilities, we will need to adopt a local Community Infrastructure Levy (CIL). This will set a rate that new developments must pay (per m² of new development), towards infrastructure projects needed to support growth.</p> <p>Work is currently underway on the development of a local CIL. Once adopted, it is expected that this will be used to support growth, by funding a wide range of help fund infrastructure projects arising from the level of growth projected for the area, (alongside other funding sources). Such an approach will help mitigate the impacts of proposed developments. In the interim period until a local CIL is adopted, the Blackhorse Lane Planning Obligations Strategy SPD will remain</p>		

Modification number	Page number	Policy/ Paragraph number	Proposed change	Justification	Source of change/ representation number
			<p>the mechanism for collecting developer contributions towards local infrastructure projects. Following adoption of the Waltham Forest CIL the Council will charge differential rates of CIL (per square metre) on liable developments. In Blackhorse Lane these rates are £70 for residential developments (including private care/ retirement homes), £150 for convenience based supermarkets/ superstores and retail warehousing, £80 for hot food takeaways and restaurants, £90 for betting shops, £20 for hotels and a nil rate for all other uses.</p> <p>In addition, developments in the area will need to contribute to the Mayoral CIL; which is being used to fund Crossrail. This equates to £20 per m2 of development for all proposals that include at least 100m2 gross internal floorspace, or at least 1 dwelling. The charge is non negotiable and will therefore be considered in setting an appropriate charge for a local CIL that does not unduly burden developers and undermine viability."</p>		

5.2 Infrastructure Plan

Modification number	Page number	Policy/ Paragraph number	Proposed change	Justification	Source of change/ representation number
AM112	131	Paragraph 5.1.8	<p>Rephrase 2nd sentence of paragraph 5.1.8 to read:</p> <p>"Whilst improved pedestrian links across the Standard Junction, improved public access into the Lee Valley Regional Park and Walthamstow Wetlands, and the provision of new and improved education, community and health facilities are key priorities, the full infrastructure requirements needed to support the level of growth proposed are set out in the infrastructure delivery plan below."</p>	Clarity	bhIps55
AM113	131	Transport	<p>Update timescale of upgrades to Victoria Line to 2013</p> <p>Rephrase 5th entrance to read: "Increased frequency of buses serving site BHL7458 bus route"</p> <p>Replace entry for "extension of Lee Valley towpath to Olympic Park" with:</p> <p>"Introduction of primary pedestrian and cycle route through Walthamstow Wetlands from Lockwood Way to Coppermill Lane - Walthamstow Wetlands Partnership - Heritage Lottery Fund and Partnership Funding"</p>	Factual updates/ clarity	Council/ bhIps63

Modification number	Page number	Policy/ Paragraph number	Proposed change	Justification	Source of change/ representation number
AM114	132-133	Public realm	<p>Replace entry for:</p> <p>"New gateway entrance to the Wetlands at Forest Road including wayfinding, and upgraded access including resurfaced bridge, at Lockwood Way, and new public access at Coppermill Lane"</p> <p>With:</p> <p>"New access points to Walthamstow Wetlands at Forest Road and Coppermill Lane - Walthamstow Wetlands Partnership - Heritage Lottery Fund and Partner Funding - 2014 - 2016"</p> <p>And:</p> <p>"New viewing platform at Forest Road, and new access point to Walthamstow Wetlands at Lockwood Way - Walthamstow Wetlands Partnership - Outer London Fund - funding secured - 2014 - 2016"</p> <p>Replace responsible organisation for "Wayfinding and interpretation within Wetlands" with "Walthamstow Wetlands Partnership" and funding sources with "Heritage Lottery Fund and Partner Funding"</p> <p>Update linear park reference to read</p>	Factual updates	Council

Modification number	Page number	Policy/ Paragraph number	Proposed change	Justification	Source of change/ representation number
			<p>"Linear park and new footbridge at Station Hub"</p> <p>At end of section insert new items:</p> <p>“Upgraded street lighting at Sutherland Road – LBWF – Council budget – 2014</p> <p>Upgraded street lighting at Higham Hill Road– LBWF – Council budget – 2014</p> <p>Environmental improvements to Sutherland Road path – LBWF – Developer contributions – 2015</p> <p>Environmental improvements to Stirling Road path – LBWF – Developer contributions - 2013</p> <p>Environmental improvements at Higham Hill Recreation Ground – LBWF – 2014</p> <p>Update timescale of Pocket Park at Papermill Place to 2013</p> <p>Delete entry for “environmental improvements at Sutherland Road path and Stirling Road path”</p>		

Modification number	Page number	Policy/ Paragraph number	Proposed change	Justification	Source of change/ representation number
AM115	133	Education	<p>Insert additional entry: "New exhibition space at the Marine Engine House - Walthamstow Wetlands Partnership - Heritage Lottery Fund and Partner Funding - 2014-2016"</p> <p>Rephrase "New primary school at education use at Site BHL3"</p>	To reflect updated proposals	Council
AM116	133	Climate Change	<p>Update funding sources to read:</p> <p>"Developer contributions, LBWF, ELENA fund, London Energy Efficiency Fund, s106 or CIL"</p>	Factual update	Council

5.3 Indicative Development Targets

Modification number	Page number	Policy/ Paragraph number	Proposed change	Justification	Source of change/ representation number
AM117	134	Section 5.3	<p>Revise paragraphs 5.3.1 - 5.3.2 to read:</p> <p>"The table below provides some targets of how the broad figures for growth in the area (as set out in the Core Strategy) will be met within the opportunity sites. It is acknowledged that these include a higher provision of retail space than advocated in the Core Strategy, and a lower provision of residential units. This is a result of more detailed analysis of site characteristics and what is likely to come forward. The shortfall of residential units from the Core Strategy target may be met through windfall sites over the plan period, whilst the increase in retail space comeswhich is as a result of permitted schemes outside the neighbourhood centre, and the need to ensure a greater mass of activity and active frontages within the proposed centre. Whilst employment space figures are also higher than those set out in the Core Strategy, it should be noted that this includes figures for refurbished employment space at the Station Hub and in Sutherland Road. These differences in figures are not considered to undermine the broad aims of the area set out in the Core Strategy and this AAP.</p> <p>It must be stressed that that these figures are indicative</p>	To clarify that figures are indicative and should not be a barrier to sustainable growth	bh1ps57

Modification number	Page number	Policy/ Paragraph number	Proposed change	Justification	Source of change/ representation number
			<p>only, and therefore provide a guide of what the Council considers reasonable given the characteristics of opportunity sites. Schemes that come forward with a different quantum of development or indeed mix of uses will not necessarily be refused, but instead judged on their merits and compliance with the policies, vision and objectives of this AAP, and other relevant elements of the Local Plan. The targets will not be applied as a restrictive barrier to development where proposals brought forward are exemplars of design quality."</p>		

6 Monitoring

6.1 Introduction

Modification number	Page number	Policy/ Paragraph number	Proposed change	Justification	Source of change/ representation number
No modifications	-	-	-	-	-

6.2 Monitoring Framework

Modification number	Page number	Policy/ Paragraph number	Proposed change	Justification	Source of change/ representation number
AM118	141	1st target under objective 1	Rephrase to read: "Development of approximately 2300 3000m ² of net retail and/ or D class floorspace within the neighbourhood centre"	Updated to be consistent with additional work on the phasing and indicative development targets of opportunity sites	Council AM118
AM119	142	1st target under objective 2	Rephrase to read: "Over 2300 2500 new homes to be built on brownfield land"	Updated to be consistent with additional work on the phasing and indicative development targets of opportunity sites	Council/ bh/lps16

Modification number	Page number	Policy/ Paragraph number	Proposed change	Justification	Source of change/ representation number
AM120	143	Final indicator under objective 3	Rephrase to read: "Local indicator - delivery of new pedestrian/ cycle link through Walthamstow Wetlands/ Lee Valley Regional Park " from Lockwood Way to Coppermill Lane	Updated to be consistent with changes to the plans for the Walthamstow Wetlands project	Council

Appendix 1 - Evidence Base for AAP

Modification number	Page number	Policy/ Paragraph number	Proposed change	Justification	Source of change/ representation number
AM121	145-148	Appendix 1	Update as set out in table below	Corrections and updates to reflect new evidence base	Council

Document	Produced by	Publication date
General		
The London Plan: Spatial Development Strategy for Greater London	Mayor of London	July 2011
Upper Lee Valley Opportunity Area Planning Framework	Mayor of London	Nov 2012 July 2013
Our Place in London – Waltham Forest Sustainable Community Strategy	London Borough of Waltham Forest	2008
Waltham Forest Core Strategy	London Borough of Waltham Forest	March 2012
Waltham Forest Development Management Policies Proposed Submission	London Borough of Waltham Forest	July 2012 2014
Blackhorse Lane Interim Planning Policy Framework	London Borough of Waltham Forest	Sept 2006
Blackhorse Lane: Station Hub and Waterfront Planning and Design Brief	Allies and Morrison Architects/ Urban Practitioners	May 2007
Blackhorse Lane: Sutherland Road Design Brief	Allies and Morrison Architects/ Urban Practitioners	May 2007
Blackhorse Lane Urban Design Framework and Planning Briefs	Maccreanor Lavington Architects	2012 1

Blackhorse Lane AAP Habitats Regulations Assessment	URS Scott Wilson	Dec 2012
Blackhorse Lane AAP Sustainability Appraisal	URS Scott Wilson	Dec 2012
Blackhorse Lane: Going for Growth (Outer London Fund Bid)	London Borough of Waltham Forest	Nov 2011
Evaluation of Outer London Fund Projects in Wood Street and Blackhorse Lane	Shared Intelligence	Jan 2013
Blackhorse Lane Area Action Plan Preferred Options	London Borough of Waltham Forest	August 2011
Growth Boroughs Prospectus	Roger Taylor	Nov 2012
Waltham Forest Local Plan Viability Assessment	BPS Chartered Surveyors	March 2013
National Planning Policy Framework	CLG	March 2012
Waltham Forest Statement of Community Involvement	London Borough of Waltham Forest	2007
Housing		
London Strategic Housing Land Availability Appraisal	Mayor of London	2009
Waltham Forest Housing Needs Assessment and Strategic Housing Market Assessment	ORS	2012
Affordable Housing SPG	Mayor of London	2012
Waltham Forest Affordable Housing Viability Study	Fordham Research	2009 10
Waltham Forest Housing Strategy	London Borough of Waltham Forest	2008
Employment		
London Borough of Waltham Forest 2009 Employment Land Study	URS	Oct 2009

London Borough of Waltham Forest – Local Economic Assessment	Navigant Consulting	Dec Nov 2010
Understanding Business Closure Rates in North London (brief) How to Promote and Support Businesses in the Current Climate	North London Strategic Alliance Fordham Consulting	2012
Land for Industry and Transport SPG	Mayor of London	2012
Upper Lee Valley Low Carbon Economy - Opportunities, Barriers and Interventions	NLSA	2011
Feasibility Assessment for the Provision of Managed Workspaces	Shared Intelligence	June 2013
Employment Land Study	Gort Scott	Nov 2013
Evaluation of Blackhorse Lane and Lea Bridge Gateway SILs	URS	Jan 2014
Retail		
Waltham Forest Retail and Leisure Study	Nathaniel Lichfield and Partners	2009
Waltham Forest Hot Food Takeaways SPD	London Borough of Waltham Forest	March 2010 09
Healthy Weight Healthy Lives: A Cross Government Strategy for England	HM Government	2008
Waltham Forest Annual Monitoring Report 10/11 12/13	London Borough of Waltham Forest	Dec 2011 13
Use Class Order 2010 3	CLG	Oct 2010 Jan 2013

Design and Character		
London Borough of Waltham Forest Characterisation Study	Urban Practitioners	July 2009
High Density Housing Qualitative Study	Urban Initiatives	Nov 2009
London Borough of Waltham Forest Local List	London Borough of Waltham Forest	Nov 2012
Open Space and Nature Conservation		
Lee Valley Park: Park Development Framework: Thematic Proposals	Lee Valley Park	Jan 2011
Upper Lee Valley Landscape Strategy	Wetherford Watson Mann	2010
Walthamstow Reservoirs Feasibility Study	Chris Blandford Associates	March April 2010
Walthamstow Wetlands – Application to Heritage Lottery Fund	London Borough of Waltham Forest	Feb 2012
Does Money Grow on Trees?	CABE	2005
Waltham Forest Open Space Strategy	London Borough of Waltham Forest	2010
All London Green Grid SPG	Mayor of London	2012
Blackhorse Lane Waterfront Park Feasibility Study	Halcrow	2009
Walthamstow Wetlands Stage C Report	KLA Design Team	Nov 2013
Walthamstow Wetlands Stage C Report – Amendments	KLA Design Team	Nov 2013
Flooding		
The EU Water Framework Directive	European Commission	2000

London Borough of Waltham Forest Level 2 Strategic Flood Risk Assessment	Scott Wilson	May 2011
Transport		
Creating Growth, Cutting Carbon: Making Local Transport Happen	Department for Transport	2011
Mayor's Transport Strategy	Mayor of London	2010
Upper Lee Valley Transport Study	Transport for London	2012
Waltham Forest Draft Local Implementation Plan	London Borough of Waltham Forest	2011
Blackhorse Lane Traffic Management Scheme	JMP	2011
Climate Change		
Upper Lee Valley Draft Energy Strategy	London Development Agency	2011
London Borough of Waltham Forest: Heat Mapping Study	Parsons Brinckerhoff	Feb 2011
Waltham Forest Decentralised Energy Study Network: Waltham Forest Satellite Schemes	Parsons Brinckerhoff	2012
Upper Lee Valley Decentralised Energy Network – Pre Feasibility Study	Parsons Brinckerhoff	2011
Upper Lee Valley Decentralised Energy Network – Feasibility Study	Parsons Brinckerhoff	2012
Infrastructure		

Waltham Forest Strategic Infrastructure Plan: Social Infrastructure Needs Assessment	URS	2009
Annex to Planning Obligations SPD: Blackhorse Lane Planning Obligations Strategy	London Borough of Waltham Forest	Feb 2009
The Community Infrastructure Levy (Amendment) Regulations 2011	GLG	May 2011
Community Infrastructure Levy (CIL) Draft Charging Schedule	London Borough of Waltham Forest	Sept 2013
School Placement Requirement Projections	London Borough of Waltham Forest	July 2011 Jan 2014
Blackhorse Road/ Hawarden Road Planning Brief	London Borough of Waltham Forest	May 2009

Appendix 2 - Glossary

Modification number	Page number	Policy/ Paragraph number	Proposed change	Justification	Source of change/ representation number
No modifications	-	-	-	-	-

Appendix 3 - Policy Map Changes

Modification number	Page number	Policy/ Paragraph number	Proposed change	Justification	Source of change/ representation number
AM122	157	Text above table	<p>Rephrase to read:</p> <p>"Once the Area Action Plan is adopted, changes to the Policy Map will be minimal. Boundaries of the Area Action Plan and neighbourhood centre, the designation of retail frontages and employment areas, and environmental designations, have already been established in our Core Strategy and Development Management Policies. As new open spaces such area proposed and do not currently exist, they cannot be designated as such on the Policy Map. Changes that are still necessary to ensure the Policy Map is consistent with plans for the area are set out below. One change still necessary refers to an old proposal from the UDP which does not form part of our latest plans for the area."</p>	To ensure policy map reflects proposals set out in the AAP	Council

Modification number	Page number	Policy/ Paragraph number	Proposed change	Justification	Source of change/ representation number
AM123	157	Table of policy map changes	New entry: Frontage of new neighbourhood retail parade as shown in figure 6	To ensure policy map reflects proposals set out in the AAP	Council
AM124	157	Table of policy map changes	New entry: Update local retail parade frontage as shown in figure 8	To ensure policy map reflects proposals set out in the AAP	Council
AM125	157	Table of policy map changes	New entry: All opportunity sites shown in figure 20 to be added to the policy map	To ensure policy map reflects proposals set out in the AAP	Council