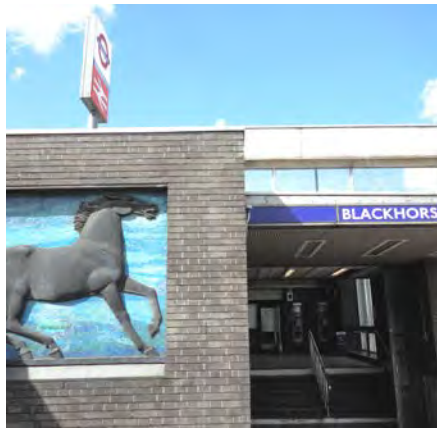


# Waltham Forest Local Plan



## BLACKHORSE LANE AREA ACTION PLAN

### Incorporating Modifications

December 2014



# Translation Sheet

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# Introduction



# 1 Introduction

## 1.1 What will the Area Action Plan do?

**1.1.1** 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 March 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.

**1.1.2** 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 been anticipated that the area has the capacity to accommodate growth in the region of 2500 new homes, and 1000 new jobs. This Area Action Plan (AAP) will form part of our Local Plan, and sets out a framework for how growth should 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 including new and improved pedestrian/ cycle routes, open spaces, and community facilities such as schools and health centres.

**1.1.3** 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.

**1.1.4** The AAP is supported by a number of documents, including a Sustainability Appraisal, Habitats Regulations Assessment, Equalities Impact Assessment, and Urban Design Framework.

**1.1.5** 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 material consideration in determining planning applications in the area.

## 1.2 Context

**1.2.1** Figure 1 shows the boundary for the Blackhorse Lane AAP. Normally AAPs are restricted to major areas of change. However, we have taken a slightly different approach and drawn the boundary wider than the main opportunity sites. This is for 2 reasons:

- Previous regeneration proposals for the area, where boundaries were drawn along Super Output Areas, have resulted in an established understanding amongst businesses and the local community of what falls within the Blackhorse Lane area.
- A key theme of our proposals is ensure new developments bring benefits to existing communities nearby.

**1.2.2** Figure 1 also shows 3 broad character zones that define the Blackhorse Lane area. These are: largely two storey residential terraced streets to the east, low density industrial/ warehousing in the centre, and open space to the north and west.

**1.2.3** The character of the urban area is largely linked to its industrial heritage, which can be traced back to the early stages of Walthamstow's growth and is relevant both locally and within the wider context of manufacturing in the Upper Lee Valley. The existing area is defined as much by its industrial character as by its residential neighbourhoods. Key features of both are shown in figure 2.

**1.2.4** The main industrial and commercial areas are located along the western boundary of the urban area adjacent to large expanses of reservoirs and open space, stretching from the Ferry Lane Industrial Estate in the south to the Lockwood Way Estate in the north (see figure 2). Additional industrial and commercial uses are also located to the east of Blackhorse Lane at Sutherland Road, including the Webbs Estate. The built character of these industrial areas ranges from older Victorian and inter-war units, with some later and often larger modern warehousing and commercial space. Building heights again tend to be generally low-rise, in the region of effectively 2-3 storeys.

**1.2.5** Residential areas to the east and south comprise of predominantly two-storey Victorian terraces fronting a typical grid-based, connected network of streets, with later inter-war and 20th century housing development concentrated more towards the north and west of the area. Recent residential development constructed at Papermill Place (see figure 2 for location), and Unity Works in Sutherland Road, comprises a more contemporary architectural approach, with buildings ranging between 3-6 storeys often arranged around shared communal space.

# Blackhorse Lane AAP Incorporating Modifications

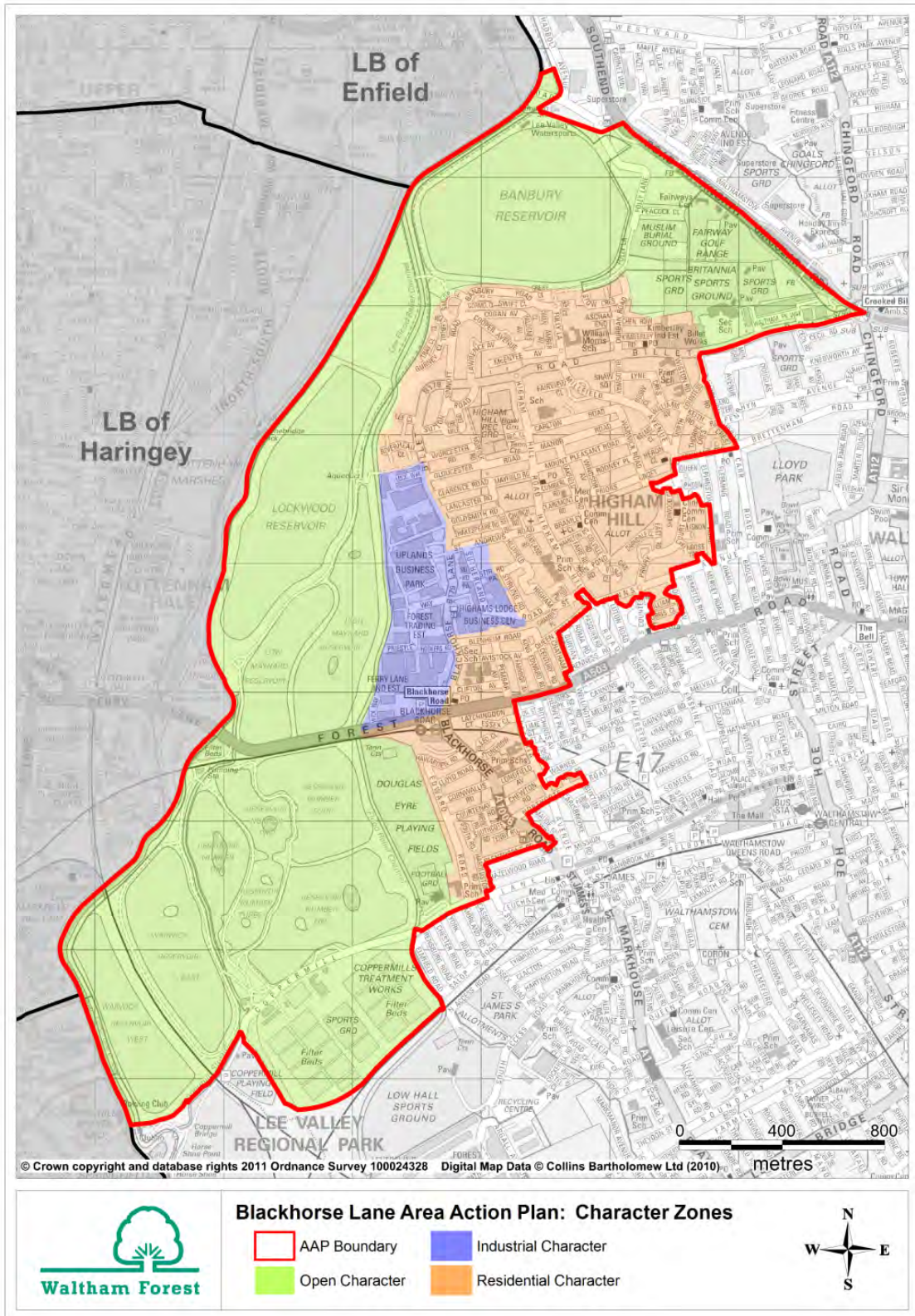


Figure 1 Character zones





**A terrace street typical of the area**

**1.2.6** The two principal routes in the area are Blackhorse Lane and Forest Road, as shown in figure 2. The main spine route of Blackhorse Lane itself runs north-south through the area before turning sharply east through to Billet Road before meeting the main road network at the Billet roundabout linking the A406 North Circular and other main routes through the borough. The main southern route of Forest Road runs east-west linking Tottenham and Walthamstow, including the key highway and pedestrian 'gateway' node adjacent to Blackhorse Road Station (i.e. the Station Hub).

**1.2.7** Streets to the east of Blackhorse Lane are generally well connected via a typical grid-based layout. Streets serving the main industrial areas to the west are less well connected with generally poor access to the adjacent Maynard, Lockwood and Banbury reservoirs.

# Blackhorse Lane AAP Incorporating Modifications

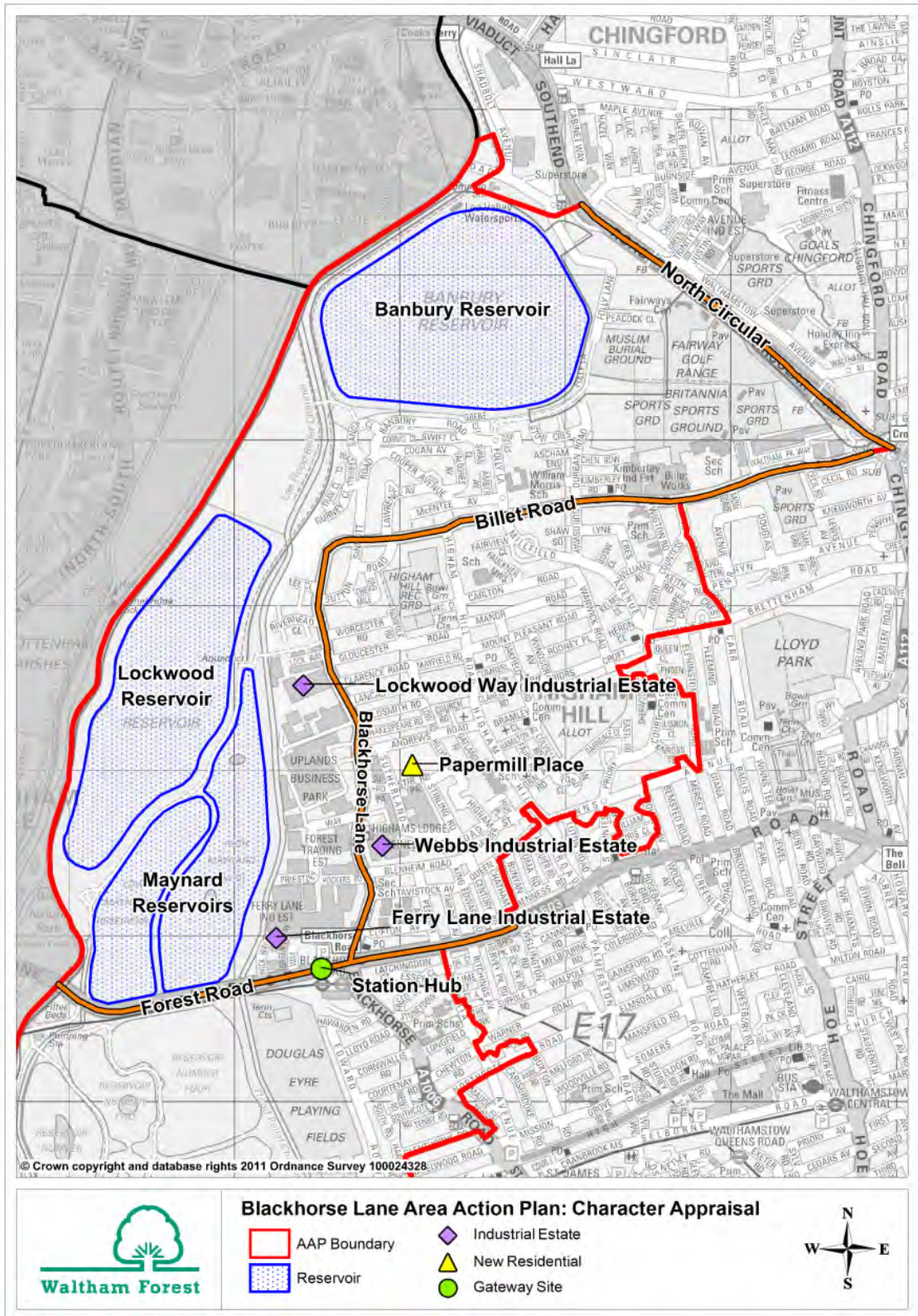
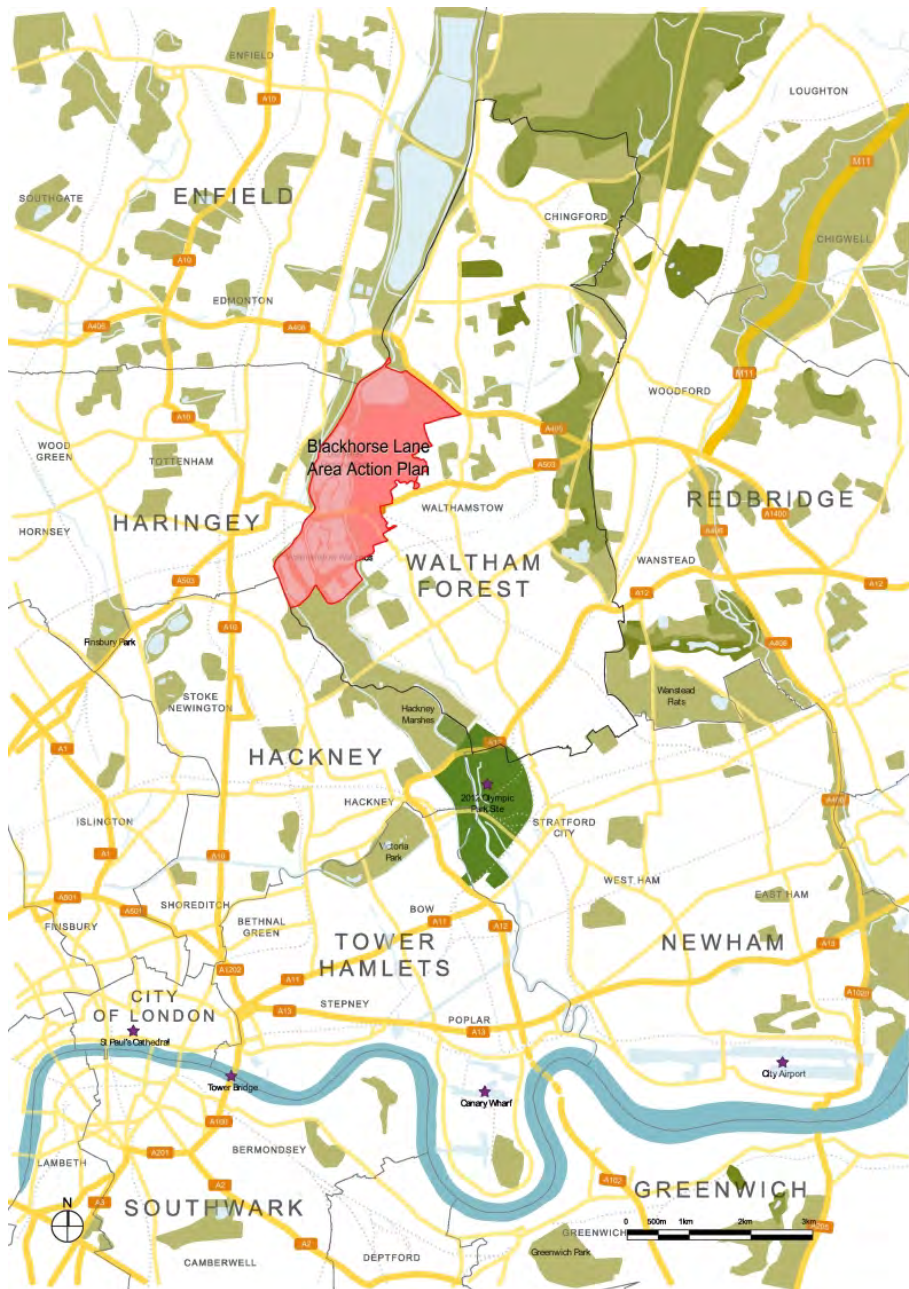


Figure 2 Character appraisal



**1.2.8** In terms of its wider context, as shown in figure 3, Blackhorse Lane is located in the western boundary of Waltham Forest, adjacent to the Lee Valley Regional Park and on the borders with the London Borough of Haringey. It falls within the Upper Lee Valley, which the Mayor has referred to as one of London's 'forgotten gems', that 'has the potential to be one of London's top places to live, work and visit' (Upper Lee Valley Opportunity Area Planning Framework, November 2012).



**Figure 3 Blackhorse Lane in context**

## 1.3 Key issues

**1.3.1** 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 publically 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).

**1.3.2** 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.



**Fantastic views of Walthamstow Wetlands**

**1.3.3** 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.



**1.3.4** 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.

**1.3.5** To ensure future developments fully realise the scale of opportunity in the area, it is important to also recognise the assets of the area.

**1.3.6** The area has a strong industrial heritage. An 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 areas also provide an opportunity to capitalise on the emergence of green industries in the wider Upper Lee Valley.



**High quality new developments**



### **A growing creative industries sector**

**1.3.7** Recognising the major asset of the Lee Valley Regional Park, the Walthamstow Wetlands project has 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.

**1.3.8** 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.



### Good public transport connections

**1.3.9** 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. 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 projects nearby in Tottenham Hale, Walthamstow Town Centre, and Stratford.

# Vision and Objectives



## 2 Vision and Objectives

### 2.1 Vision

**2.1.1** Our vision for how we see the area develop in the period to 2026 is set out below:

'The long-term vision is to evolve Blackhorse Lane into a mixed-use area, comprising a range of housing, interspersed with small-scale local business/commercial spaces and public open spaces. Existing built fabric and cultures are retained and characterise the new neighbourhoods, creating meaningful desirable places to live and work. Residents and employees have access to resources and opportunities locally, offering betterment and wealth generation. Unique resources such as the Lee Valley Regional Park and the phenomenal Walthamstow Wetlands are integrated into a positive public realm framework, designed to encourage social interaction and creating access for all. New developments are well integrated, demonstrate high levels of environmental sustainability, and enhance the image of the area.'

**2.1.2** Further detail of how this will be achieved is set out later in the document. A visual representation of the key elements of the plan is set out in figure 4.

### 2.2 Objectives

**2.2.1** To achieve our vision for Blackhorse Lane, a number of objectives have been developed for the area. Meeting these will be an underlying theme that will help shape the policies in the AAP, and that future developments should seek to accord with.

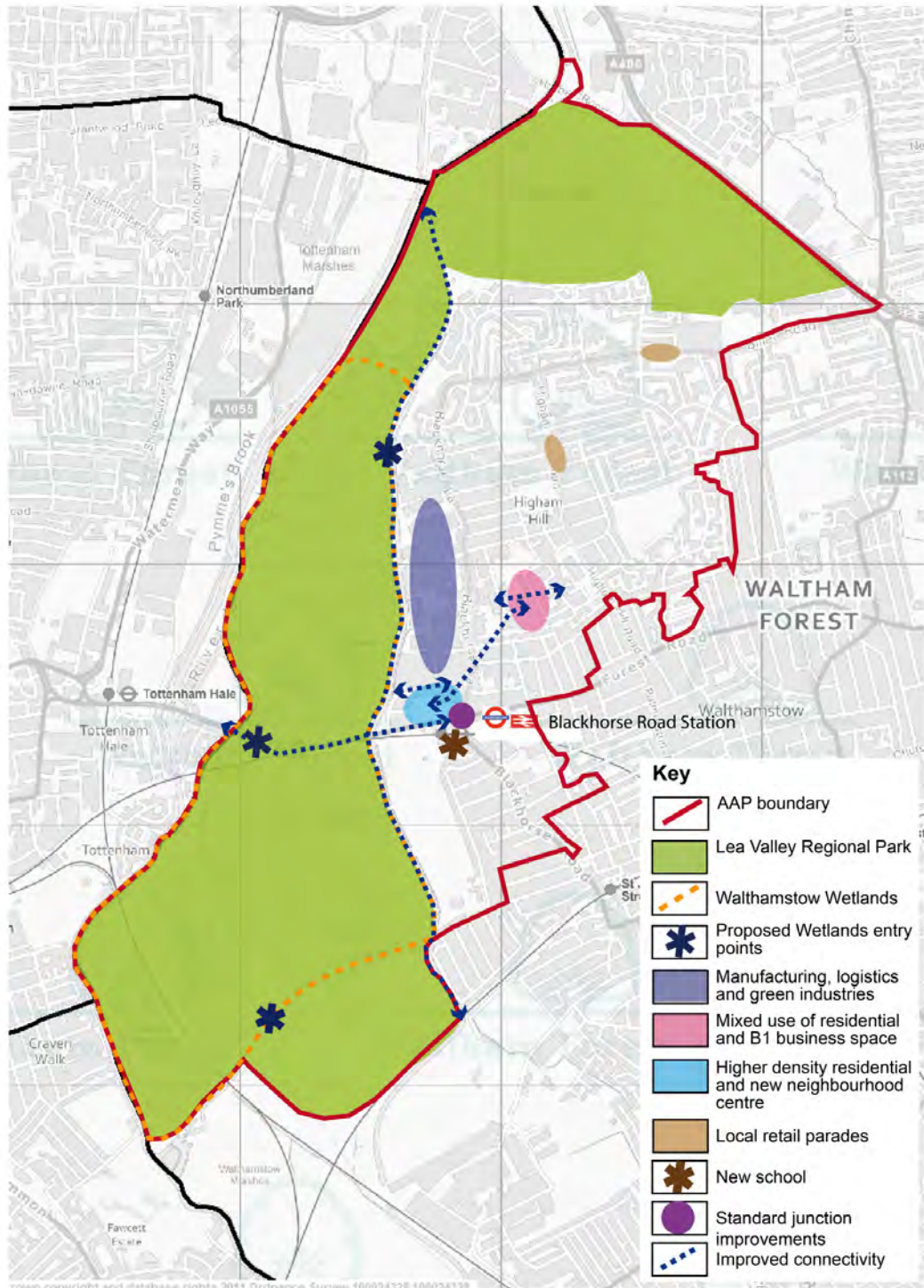


Figure 4 Key diagram

### **Objective 1 - A Neighbourhood Centre**

To ensure Blackhorse Lane has a clear neighbourhood centre, which provides a range of shops and services to meet the needs of local residents and businesses, and encourages passers by to spend more time in the area.

### **Objective 2 - A Place to Live**

To provide a range of high quality homes that attracts families and the young and upwardly mobile to live in the area, as part of a mixed and balanced community that also caters for local housing need.

### **Objective 3 - A Green Place**

To ensure existing and new residents and workers in the area have better access to a range of open spaces, including Walthamstow Wetlands, Lee Valley Regional Park, and the Olympic Park.

### **Objective 4 - A Well Designed Place**

To enhance the image of Blackhorse Lane by ensuring all new developments in the area (including both buildings and public realm) are designed to a high standard and fit for purpose, and interact sensitively with their surroundings, especially blue/ green spaces.

### **Objective 5 - A Place for Creative and Green Industries**

To ensure Blackhorse Lane continues to provide a range of jobs for our residents, and support the retention and growth of creative and green industries in the area.

### **Objective 6 - A Sustainable Place**

To ensure new developments incorporate the highest levels of sustainable design and their impact on climate change is minimised.

### **Objective 7 - A Connected Place**

To facilitate a modal shift away from private car use and towards walking, cycling and public transport for trips within the area and beyond; through a range of measures and incentives including physical enhancements to the Standard Junction.

**Objective 8 - A Community Place**

To enhance or provide a range of new facilities including social spaces, to meet the needs of existing and new residents and businesses, in order to strengthen 'community spirit'.



# Key Policy Areas

## 3 Key Policy Areas

### 3.1 Introduction

**3.1.1** In accordance with the National Planning Policy Framework, making a positive contribution towards sustainable development will be an underlying theme to how we treat development proposals. Policy BHL1 below, therefore sets out some broad principles that we will apply when working with developers and landowners.

#### **Policy BHL1: Presumption in Favour of Sustainable Development**

A) When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will always work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.

B) Planning applications that accord with the policies in this Local Plan (and, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise.

C) Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise - taking into account whether:

- Any adverse impacts of granting planning permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or
- Specific policies in that Framework indicate that development should be restricted.

**3.1.2** Within this section, a series of topic based policies have been produced. It is intended that these focus on issues specific to the Blackhorse Lane area. Generic issues common throughout the borough, such as community safety or sustainable construction, are already dealt with comprehensively in our Core Strategy and Development Management Policies, so will not be duplicated here. For this reason, it is important that the AAP is not read in isolation.

**3.1.3** The policies contained within this AAP, and the wider Local Plan, are intended to support sustainable development, and not place undue burdens on developers. Viability will be a key consideration as schemes come forward but must be balanced

against social, economic and environmental goals. Where proposals do not strictly comply with policy for reasons of viability, very clear justification will be required, and the Council will need to be satisfied that the proposal would not undermine the delivery of the plan. To support its policies and ensure they do not place undue burdens on developers, the Council has considered the cumulative impact of its Local Plan policies in the Waltham Forest Local Plan Viability Assessment (BPS Chartered Surveyors, 2013).

## 3.2 Housing

### Introduction

**3.2.1** Our Core Strategy sets out that around 2500 new homes are expected in the area by 2026. These will form a key element of our regeneration proposals as the area develops; helping to address housing need, upgrading the quality of the physical environment, and supporting local services and the viability of new developments.

**3.2.2** It is important that new communities are integrated through developments of appropriate densities; that respect the existing built fabric whilst simultaneously making efficient use of land around key transport nodes. A range of housing types and tenures will also be necessary, so that mixed and balanced communities can be created.

### Policy BHL2: Housing Growth

As a key growth area, we will seek to deliver at least 2500 new homes by 2026 in the Blackhorse Lane area. This target will be met by bringing forward housing as a key element of mixed use schemes in the opportunity sites set out in section 4 of this document. Where proposals are acceptable in all other respects, windfall sites that would result in an increased housing supply will also be supported.

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.

## Justification and explanation

**3.2.3** The prevalence of under utilised land in sustainable locations close to Blackhorse Road Station means the area has the capacity to accommodate a significant proportion of the borough's housing growth over the next 15 years. The Greater London Authority's (GLA's) Strategic Housing Land Availability Assessment (SHLAA) in 2009, identified a capacity in the region of 2000 units. Since these findings were published, further analysis has established that there is both an appetite and capacity to achieve higher densities than previously envisaged on opportunity sites. On this basis, the Core Strategy advocated provision of 2500 new homes in the area.

**3.2.4** 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 to 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.

**3.2.5** 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 be achieved, and in terms of making a convincing case of the benefits a student population would bring to the local economy.

**3.2.6** Every effort has been made to liaise with landowners and understand their future plans and aspirations in the development of this document. However, unforeseen circumstances can emerge in the AAP's lifetime, meaning previously unavailable sites may come forward for redevelopment. Such opportunities may bring significant regeneration benefits, and as such should be treated positively where they comply with the aspirations of this AAP, and the wider Local Plan. Meeting our headline target of at least 2500 new dwellings in the area is not dependant on such 'windfall sites' coming forward.



### Policy BHL3: Housing Densities

The Council will seek to optimise housing densities on sites throughout the plan area. As a general principle, higher density residential development should be concentrated on sites surrounding Blackhorse Road Station. Key considerations when determining appropriate densities will be:

- A) the existing PTAL covering the site;
- B) any planned improvements in provision of shops, services and public transport in the locality;
- C) 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 DM29 (Design Principles, Standards and Local Distinctiveness) should be met.

### Justification and explanation

**3.2.7** The accessibility of the Blackhorse Lane area by a range of means of transport, comparative to other parts of the borough, is a major reason for its status as one of our 'key growth areas.' As the AAP covers a wide geographic area, the sustainability of individual opportunity sites will vary considerably. In those areas closest to the train station, residents will have more transport choices in the form of the tube, overground trains, and a range of buses. They will also have ready access to shops and services in the planned new neighbourhood centre. Such factors can contribute greatly to a sustainable pattern of living, where the need for private car trips are minimised. Locations around Blackhorse Road Station are therefore the logical choice for the greatest quantum of residential development in the area, and the highest densities.

**3.2.8** There are sites away from Blackhorse Road Station that also offer scope for residential development. As distance from the station increases, there will be a drop in Public Transport Accessibility Levels (PTALs), and the availability of shops and services. This will place an increased demand on private car use, and as such housing densities should be lower.

**3.2.9** Public Transport Accessibility Levels (PTAL's) will be a key consideration for determining the density a site should be developed to, in line with the London Plan. However, they should be considered alongside what the existing and planned offer of shops and services is in the locality, or indeed any committed public transport improvements. Mixed use schemes in more remote parts of the AAP that incorporate modest convenience shopping or social infrastructure such as health facilities, could

increase the sustainability credentials of residential led schemes, and as such may enable an increase in densities. Such proposals should not however, detract from the new neighbourhood centre; which should be the main focus for growth both in terms of housing, and shops and services.

**3.2.10** Higher densities can secure efficient use of land. When focussed in the right locations they can influence sustainable living patterns. It is important however, that any push for higher densities does not compromise design quality. Medium to high density development only works when it is built to a high quality, with generous room sizes and amenity space, and appropriate maintenance mechanisms in place. As set out in our High Density Housing Qualitative Study (Urban Initiatives, 2009) 'high density housing needs to be exceptional, and aspirational, in order to convince people...that it is an acceptable housing choice.' Our Development Management Policies set out standards for all schemes in terms of internal space, and private and communal outdoor space. It also places a requirement on schemes to meet Building for Life and Lifetime Homes criteria. High density schemes need to be of exceptional quality, and where they are proposed our standard space requirements should be exceeded.

### Policy BHL4: Household Sizes

A range of household sizes will be required in new developments in the interests of creating a mixed community. Our standard requirements are set out in Development Management Policy DM5 (Housing Mix). Cases in Blackhorse Lane where we will consider deviating from this include:

A) 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 should have 3 or 4 bedrooms.

B) More peripheral locations, such as Site BHL7 (Billet Works); where a higher proportion of family housing will be sought.

### Justification and explanation

**3.2.11** A range of housing types and tenures will be needed in new developments to create mixed communities, as advocated in the National Planning Policy Framework, and the London Plan. As such, it is expected that all proposals offer a mix of household sizes, which will be negotiated based on site circumstances. In doing so, it should be noted that as established in our Core Strategy, housing need in the borough is most acute for larger affordable family homes (i.e. 3-4 bedroom properties). Meanwhile, our Housing Needs Assessment and Strategic Housing

Market Assessment (ORS, 2012), offers evidence that Blackhorse Lane currently suffers from more overcrowding than our other key growth areas, or the borough as a whole. We would therefore normally expect the developments to meet the borough's requirements for family sized housing as a minimum.

**3.2.12** Having said this, sites BHL1 (Station Hub and Waterfront) and BHL2 North (Car Wash Site) are considered to offer a unique opportunities for higher density, smaller properties suitable for young professionals that could be attracted to an attractive waterfront development offering easy access to Central London. A mass of such people in this area could also help support a vibrant neighbourhood centre. Generous space standards and a significant element of 3 and 4 bedroom properties will be necessary in order to secure a high quality scheme that does not undermine the concept of mixed and balanced communities.

**3.2.13** In looking at the wider AAP area, if there is scope for smaller property units close to the station, it follows that such a skew should be reversed on alternative sites in more peripheral locations. As distance from Blackhorse Road Station is increased, developments should take a more urban, rather than town centre nature; with fewer units, and increased property sizes. This will help meet the borough's pressing demand for family housing, and could also help reduce population churn, which is a major issue facing the area. Evidence of this is provided in our Housing Needs Assessment and Strategic Housing Market Assessment (2012); which found that 14% of residents in Blackhorse Lane have lived in the area for less than 2 years and 35% for less than 5 years. Again, on all sites a full mix of property sizes should still be provided in the interests of creating a mixed and balanced community.

### Policy BHL5: Affordable Housing

New developments should provide affordable housing in accordance with the requirements of Core Strategy Policy CS2 (Improving Housing Quality and Choice), and Development Management Policy DM3 (Affordable Housing Provision).

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.

Financial contributions to off site affordable housing will only be accepted in exceptional circumstances, where it is not practical to provide affordable housing on site.

## Justification and explanation

**3.2.14** Alongside household size, tenure split will be an important factor in ensuring a mixed and balanced community is established in new developments. This needs to take account of the existing picture of housing need, and what form recent developments have taken.

**3.2.15** Existing housing need in the borough is very high. Our Housing Needs Assessment and Strategic Housing Market Assessment (2012) found that by 2031, a total of 13,000 additional affordable homes will be required across the borough to meet housing need. This exceeds our London Plan total housing requirements to 2026, which is 11,400.

**3.2.16** The Housing Needs Assessment and Strategic Housing Market Assessment also provides us with a useful insight into the current tenure make-up of the Blackhorse Lane area. Levels of owner occupation here are under 25%, which is significantly lower than the borough average of approximately 45%. Subsequently there are a high percentage of socially rented properties (32%) and private rented dwellings (43%). The dominance of private rented properties in particular, reinforces the point that this is an area with a mobile population.

**3.2.17** 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 an area than those privately renting.

**3.2.18** Given the significant level of housing need in the borough, we will seek to maximise affordable housing provision through all new developments. The concept of mixed communities means that affordable products should be interspersed with market dwellings. Our standard practice is therefore that affordable housing should be provided on site. A headline target of 50%, subject to viability considerations, should be applied. Of this, 60% should be for social or affordable rent, and 40% for intermediate products. This is in line with our borough wide approach as set out in the Core Strategy and Development Management Policies. 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 our Core Strategy.



**3.2.19** There may be cases where it is possible to deviate from these standards, based on site specific circumstances. However, this would need to be fully discussed and agreed with the Council's Strategic Housing Team. Firstly, viability will be a key consideration that determines how much and what type of affordable housing can be provided. Schemes that do not meet policy requirements are therefore expected to go through the Council's viability assessment process. Where viability is poor, and a lower than policy level of affordable housing is accepted by the Council, conditions will be attached to any agreements to ensure the maximum level of affordable housing is provided if the schemes viability improves.

**3.2.20** Normally all affordable housing should be provided on site. There may however, be exceptional circumstances where financial contributions towards off-site provision would be preferable. This could be where there is evidence that an over-concentration of affordable products exists, and a greater provision of market housing would aide the creation of mixed and balanced communities. Such an approach is consistent with both the London Plan and the Mayor's Draft Supplementary Planning Guidance on Affordable Housing. Section 3.74 of the London Plan sets out exceptional circumstances where funds towards off site affordable housing may be preferable to direct provision on site, which includes 'to secure a more balanced community.' In addition, the Mayor's Draft Supplementary Planning Guidance on Affordable Housing also states that exceptional circumstances could be 'where there are existing concentrations of particular types of housing (usually social), and there are demonstrable benefits to be gained by providing new units in a different location, such as to create more mixed balanced communities.'

**3.2.21** Where a financial contribution is deemed acceptable, this should be of a broadly equivalent value to the cost of providing units on site. Funds gathered will then be pooled towards the provision of new affordable housing in areas of the borough where a lack of such products exists.

### **Relevant objectives:**

- Objective 2 – A Place to Live

## **3.3 Employment**

### **Introduction**

**3.3.1** The Blackhorse Lane area has a strong industrial heritage, which is still apparent from the urban fabric today. Some parts of the area are designated as SIL, meaning the Mayor considers them important not just in terms of local employment, but also in supporting the wider London economy. Falling within the Upper Lee Valley, it forms part of one of London's major corridors of economic activity, and is also one of the borough's main concentrations of employment land.

**3.3.2** 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.

**3.3.3** 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.

### Policy BHL6: Employment

The role of the Blackhorse Lane area as a major employer of local people will be retained and enhanced by:

A) providing new high quality B1 floorspace for a range of small/ medium businesses and creative industries as part of mixed use developments in the sites identified in Section 4: Opportunity Sites. Where provided, new floorspace should;

- meet the requirements of Development Management Policy DM19c
- provide suitable access, servicing and parking for commercial vehicles
- be of a sufficient scale to ensure the continued employment function of the area is not undermined; giving due consideration to the indicative targets for new employment floorspace set out in section 5.3 of this document
- be marketed at rents and service charges affordable to small and medium enterprises; which may be controlled through the use of planning obligations.

B) 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.

C) requiring redevelopment of existing employment land that is neither designated as SIL nor identified as an opportunity site in Section 4 of this AAP, to demonstrate that the existing space is no longer fit for purpose, and has no reasonable prospect of coming forward for future employment use. Evidence should be provided that:

- the site has been appropriately advertised at a price in line with local market values, with terms and conditions that are reasonable and attractive to potential business

- all opportunities to re-let for employment generating uses have been adequately explored, including where this requires flexibility in terms of sub-dividing existing floorspace

Where it is accepted that existing business space is no longer fit for purpose, redevelopment should incorporate new fit for purpose B1 space in accordance with the requirements of policy point A to ensure the development brings an uplift in levels of employment on site. Where this is not possible, justification on viability grounds will be required.

D) supporting the refurbishment of existing industrial buildings of architectural merit where viable; to provide new employment space with high environmental standards for small and medium businesses;

E) supporting uses that offer education and training opportunities for local residents within new, mixed use developments, outside of land designated as SIL;

F) securing employment and/ or training of local people within new developments and during their construction; through local labour agreements, jobs brokerage initiatives, or financial contributions towards wider employment and training initiatives.

G) 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.

## Justification and explanation

**3.3.4** Our Core Strategy sets an indicative target of 10,000m<sup>2</sup> new employment space in the area. Whilst there will be some redevelopments for new B2 and B8 uses in areas designated as SIL over the lifetime of the plan, as traditional manufacturing is known to be declining nationally, a significant contribution towards new employment space is envisaged to come through high quality B1 business units as part of mixed use schemes.

**3.3.5** B1 business space can sit more comfortably alongside residential neighbourhoods than B2/ B8, due to less demand for heavy goods deliveries, less noise and fumes. They can also secure a greater intensity of employment, meaning a greater number of jobs on smaller building footprints. Research cited in our Development Management Policies indicates average employee to m<sup>2</sup> floorspace ratios are 1 employee per 12m<sup>2</sup> for B1, 1 employee per 32m<sup>2</sup> for B2 and 1 employee per 65m<sup>2</sup> for B8. As Blackhorse Lane is one of the borough's key employment areas, we will seek to maximise fit for purpose B1 uses in the opportunity sites where mixed use development is considered appropriate (see Section 4). 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.

**3.3.6** As set out in the Council's Local Economic Assessment (Navigant Consulting 2010), small businesses make a significant contribution to the local economy, and prospects of attracting major new employers to the area are bleak. It is therefore important that space is provided for a range of start up businesses in order to encourage entrepreneurship. There is an established creative cluster in the area, which has the potential to grow as such sectors are priced out of areas of East London such as Hackney. 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 should be celebrated (as done so through the E17 Arts Trail), 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. Matters such as generous floor to ceiling heights, capability of storing machinery, and suitable access and parking arrangements will all ensure that where new business space is provided, it is well placed to attract a variety of occupants; and not just studio space for artists. This will help avoid potential future vacancy, upgrade the employment offer in the area, and could help secure a greater range of employment opportunities for our residents. Whilst it will be down to developers to demonstrate that appropriate standards have been applied to respond to the markets needs, as a general rule clear ceiling heights of at least 3.35m and loading capacities of 4.25kN per m<sup>2</sup> will normally be acceptable. This is common with practice elsewhere in London of the operational requirements of light industrial users.

**3.3.7** Flexible floor plates including minimal supporting columns can ensure employment space is future proofed and offers scope for small start up businesses to grow and flourish. This will be particularly important given the reduction in public sector employment and the government's assertion that this will be offset by a growth in private enterprise. In addition, some live/ work units may also help provide for emerging creative industries in the area. Where done so, it is important that these are designed for their dual purpose, and attention is drawn to guidance in our Development Management Policies.



**3.3.8** 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 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.

**3.3.9** 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 to form some workshop 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.

**3.3.10** 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, 2013) of the benefits of providing a critical mass of new employment spaces for small businesses to enable networking and use of shared facilities. 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.

**3.3.11** The area shown in figure 5 below has been designated as SIL in our adopted Core Strategy, the London Plan, and the Upper Lee Valley Opportunity Area Planning Framework. This safeguards the land for employment generating uses that sit less comfortably alongside residential than the B1 uses referred to above; thus ensuring a full range of jobs can be provided in the area.

# Blackhorse Lane AAP Incorporating Modifications

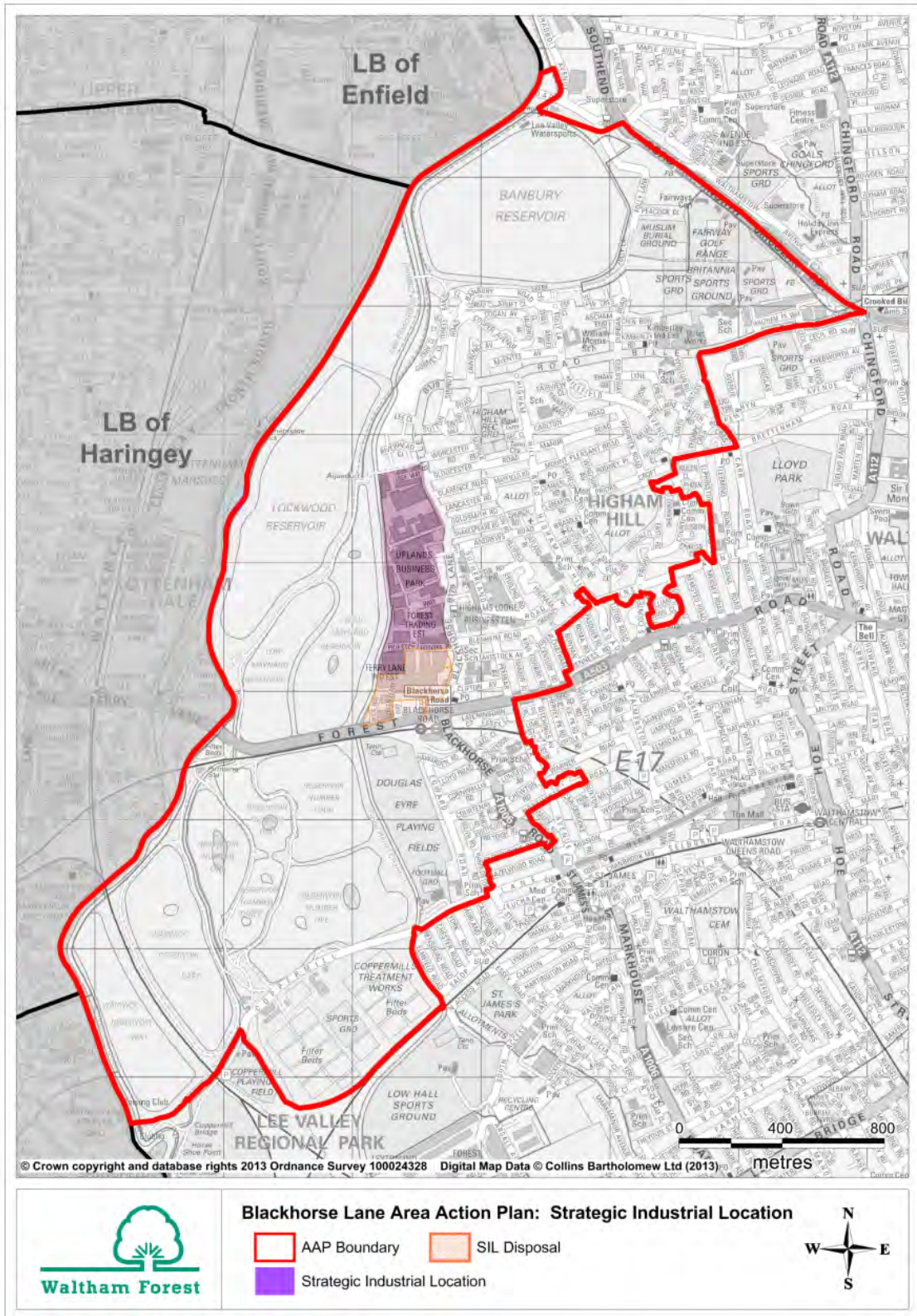


Figure 5 SIL designation

**3.3.12** The extent of the SIL designation has been subject to negotiation and agreement with the Mayor, since the land also plays a strategic role in providing a reservoir of industrial and warehousing land to support the wider London economy. As set out in the Mayor's Land for Industry and Transport SPG, such land is needed to fulfil economic and wider sustainability objectives, including retaining some capacity for responsive 'just in time' logistics in proximity to the Central Activities Zone and Canary Wharf to support the financial and business services sector and growth in other services, including culture, leisure, tourism and hospitality. The Gort Scott Employment Study (2013) provides evidence of the nature, levels of activity, and productivity of existing businesses in this area. Furthermore, the strategic location between the Green Enterprise District in the Lower Lee Valley, and existing Energy from Waste facilities in Enfield, means the area is well placed to capitalise on the growth of green industries in the region, which is a key objective of the Mayor's Upper Lee Valley Opportunity Area Planning Framework. In terms of specific opportunities the NLSA report 'Upper Lee Valley Low Carbon Economy: Opportunities, Barriers and Interventions (July 2011)' noted that the refitting or removal of older building stock in Blackhorse Lane SIL offers opportunities for low carbon economic activity. Sub sectors identified for the area, which could include research and development, are:

- Waste and recycling - vehicle recovery;
- Manufacturing and engineering - precision component engineering;
- Construction and retrofit - component manufacture, installation and distribution;
- Low carbon vehicles - supply and servicing, component production; and
- Power and fuels - waste to energy, alternative energy generation, renewable energy technology.

**3.3.13** 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 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 residential 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, an analysis of the local property 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.

**3.3.14** 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 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.

**3.3.15** The AAP has been prepared in consultation with relevant landowners. Later in the document, guidance is provided on key sites where opportunities exist for mixed use developments that can bring regeneration benefits. Reasons are also provided for why certain proposals that have come forward have been dismissed.

**3.3.16** Over the lifetime of the plan, it is possible that there will be pressure for further loss of employment space to more profitable uses. In land designated as SIL, alternative uses will not be acceptable due to their incompatibility with the reasons for the designation, as discussed above. Elsewhere a greater degree of flexibility may be possible, subject to a variety of tests to ensure the existing employment space genuinely no longer holds potential for such use. This is necessary because the loss of further employment space would be detrimental to the vitality and economic prosperity of the area, and also to discourage intentional neglect of sites to realise 'hope value', as set out in the Mayor's Land for Industry and Transport SPG.

**3.3.17** In terms of compelling evidence that land is no longer fit for purpose, prominent advertising through a range of media should be used. 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](http://www.focusnet.co.uk)

**3.3.18** Furthermore the terms of conditions of any lease (including length of lease), and price for which the site is available will also have a major impact on the likelihood of finding willing occupiers. 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.

**3.3.19** Where substantial evidence has been provided that there is no prospect of attracting future occupiers to the existing site, redevelopment should seek to incorporate new high quality B1 business space as part of any scheme. This will help support the continued business function of the area. We will seek to maximise the provision of new B1 space in such schemes. Open book assessments will be needed to support any claims that such space cannot be provided on viability grounds.

**3.3.20** Through mixed use developments, other uses such as health or community centres, and retail, may also play a positive employment function. However their impact on existing centres and parades, and the aspiration for Blackhorse Lane to have a clear neighbourhood centre, will be important considerations.

**3.3.21** As set out in Section 3.5: Design and Local Character, the industrial legacy of the area means that some attractive industrial buildings exist that offer scope for refurbishment for employment generating uses to help contextualise development. Practice in other areas with a strong creative base, such as parts of Hackney, indicates such buildings could viably be put to productive use and add to the vibrancy of the area. For example, the Kings Network Building, which is currently underutilised, benefits from a prominent road frontage, and generous industrial proportions that could reasonably home a variety of small businesses. Meanwhile, some existing buildings in Sutherland Road are currently occupied by employment uses that cause nuisance to surrounding residential occupiers, but could be better utilised as Artisan Workshops. The Council is in the process of exploring options for converting such units using money from the Outer London Fund.

**3.3.22** As set out in the Core Strategy, worklessness is a major issue in the borough; with unemployment higher than the London average. Lower than average skills are a contributing factor, and if traditional industries continue to decline this could result in a workforce that is not adequately skilled for the needs of modern business practices. As set out in our Local Economic Assessment (Navigant Consulting, 2011), nearly 20% of employment in Blackhorse Lane is in the manufacturing sector. Meanwhile William Morris Ward (which partly falls in the Blackhorse Lane area), already has the highest proportion of male Job Seekers Allowance claimants in the borough.

**3.3.23** Training and education centres can help aid the employment function of the area by enhancing local resident's skills and qualifications. Co-locating them amongst areas of employment can also offer synergies between business and education, by offering opportunities for 'on the job training', and strengthening relations

between education providers and employers. Such uses can also often sit comfortably alongside residential, and offer greater opportunities for buildings that raise the bar in terms of design standards than the types of uses to be directed to SIL.

**3.3.24** A commitment to both the training and employment of local residents can be secured through conditions to planning permissions. Alongside new training and education establishments, this provides a key mechanism for addressing worklessness through new developments. Where training is provided during the construction phase, this could include valuable skills such as the installation of renewable technologies, green roofs, and high quality insulation. Given aspirations for the growth of green industries in the Upper Lee Valley, this would provide local residents valuable skills to enhance their chances of finding gainful employment.

**3.3.25** In addition effort will be made to ensure existing jobs are retained in the area. This can be through protecting existing businesses that sit comfortably alongside residential (e.g. Dunhills), or assisting displaced businesses to find alternative sites; such as in land designated as SIL. Supporting existing businesses will be particularly important given NLSA evidence of notably high company closure rates in the borough (19.6% compared to a London average of 15% and Great Britain average of 13%).

### **Relevant objectives:**

- Objective 5 – A Place to do Business and for Creative Industries

## **3.4 Neighbourhood Centre and Local Retail Parades**

### **Introduction**

**3.4.1** The Tryst Public House and Standard Music Venue have 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. The Council has secured money for shop front improvements to some of these units as part of the Outer London Fund. However, the current lack of a diverse offer of retail, leisure and community facilities for residents, businesses, and passers by, means the area fails to function effectively as a destination where people are happy to spend any significant length of time.

**3.4.2** The recently built Tesco Express at the 'edge of centre' site of the former Essex Arms Public House (site BHL9) will help provide a range of convenience goods to the locality, but given projected levels of growth, a greater quantum of commercial development, including facilities that contribute to a sense of community, will be necessary. A central hub of town centre uses is needed to compliment the existing retail parade, meet local need, and help the area function better as a destination.

### **Policy BHL7: Neighbourhood Centre and Local Retail Parades**

A) A new neighbourhood centre will be created at Blackhorse Lane within the designated area shown on figure 6 to meet the needs of local communities by:

i) Protecting and enhancing the Neighbourhood Retail Parade as shown on the policies map in line with DM Policy 25: Managing Changes of Use in Town Centres, and securing physical improvements to these properties.

ii) Focussing new A1-A4 and D1-D2 uses along the ground floor of the Forest Road Neighbourhood Retail Parade shown in figure 6

iii) Resisting all proposals for new A5 units and avoiding the proliferation of betting offices

iv) Restricting the net floor area of any individual retail development to 1000m<sup>2</sup>

v) Ensuring redevelopment of the Station Hub (Site BHL1) either retains and refurbishes the Tryst Public House and Standard Music Venue for their established uses, or re-provides a public house capable of hosting live music within the scheme as part of a high quality mixed use development.

vi) Ensuring proposals provide, and do not compromise opportunities for, an enhanced public realm and new public open spaces including internal courtyards, in accordance with the Urban Design Framework.

B) 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 25: Managing Changes of Use in Town Centres. Environmental enhancement projects that support the viability of these parades will also be supported.

C) Outside of the designated local retail parade, the loss of units 256, 260 and 318-322 Higham Hill Road to residential use will be resisted, unless they can be re-provided within the designated parade.

D) Any proposals for town centre uses outside of the neighbourhood centre and local retail parades will need to meet the requirements of Development Management Policy DM26: New Retail, Office and Leisure Developments.

## Justification and explanation

**3.4.3** Based on the findings of our Retail and Leisure Study (2009), The Core Strategy designates Blackhorse Lane as a new neighbourhood centre. Consultation with residents and businesses, both on the Interim Planning Policy Framework produced in 2006, and on the development of this AAP, has highlighted local support for a greater range of shops, cafes, bars and restaurants.

**3.4.4** As the most accessible part of the area, such facilities should be co-located in prominent locations close to the station. Consolidating commercial uses in the centre will help create a central hub of activity, provide an active frontage, and mean units can benefit from passing trade from commuters and visitors to the area. They are proposed to be focussed along the Blackhorse Lane frontage in order to compliment the existing retail parade opposite, and to ensure they are well placed to serve the major areas of population growth. Ensuring the area has a successful and vibrant neighbourhood centre could help ensure the area has a clear identity and discourage the population churn referred to in the housing section of this AAP.



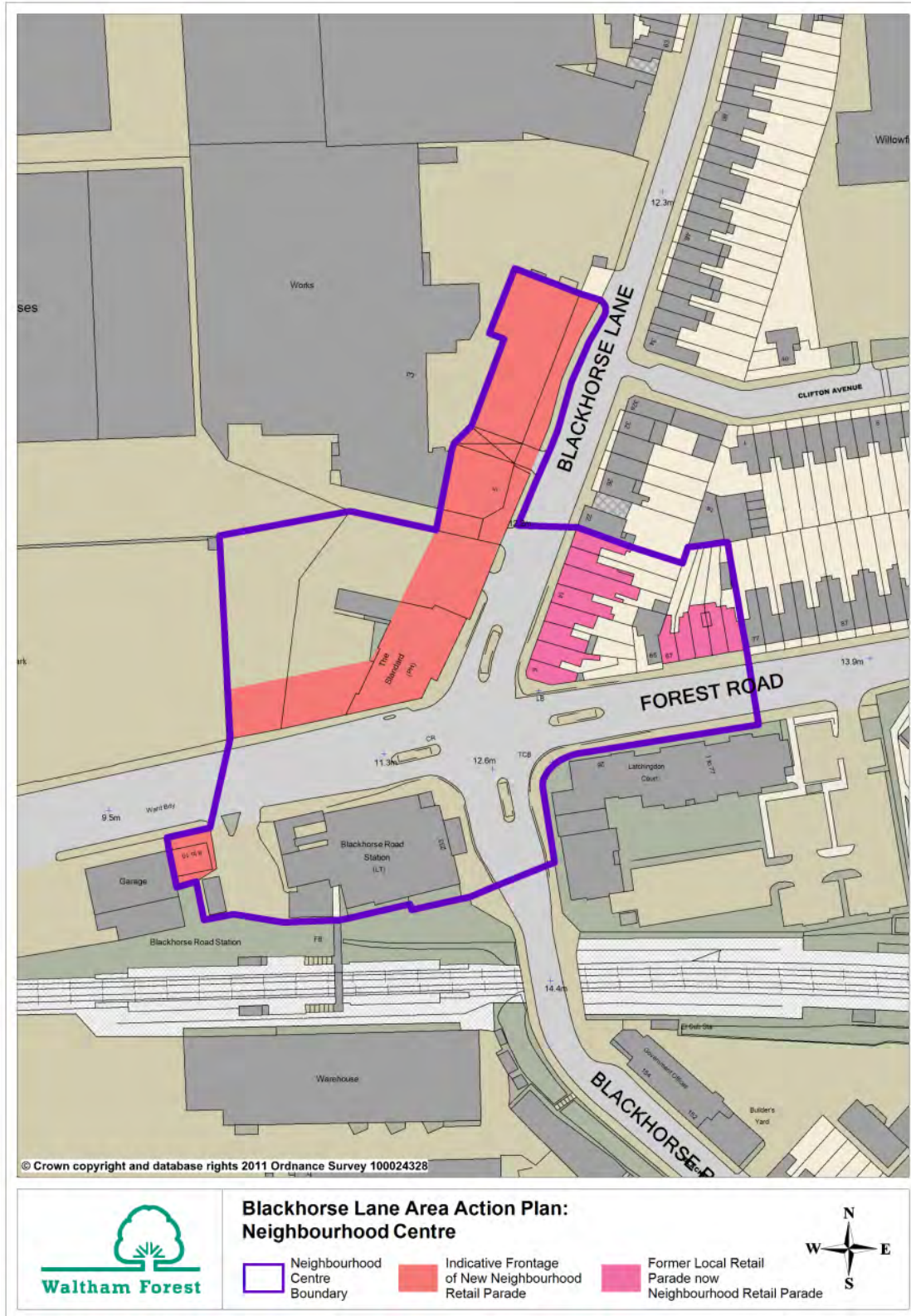


Figure 6 Neighbourhood centre

**3.4.5** A small parade of independent retail units already exists at the junction of Blackhorse Lane and Forest Road. The designation covering these should be upgraded from Local Retail Parade to Neighbourhood Retail Parade and be protected from pressure for alternative uses in line with Development Management Policies. Some of these units will also be subject to environmental improvements using money committed from the Outer London Fund. This will include enhanced shop fronts and the installation of public art at the blank gable of the unit at the junction of Blackhorse Lane and Forest Road. By consolidating additional retail and other town centre uses close to this existing parade is in line with Core Strategy objectives in terms of enhancing residents access to local shopping and reducing unsustainable trips to other shopping destinations. Focussing to the north of Forest Road will also help ensure this serves the main areas of population growth and mean units could benefit from natural movements north towards the linear park at the Station Hub and Waterfront site (see Section 3.6: Public Open Space and Nature Conservation).

**3.4.6** The mix of uses within the neighbourhood centre will be important in ensuring it fulfils its role as a community hub. The National Planning Policy Framework outlines main town centre uses as retail, leisure and entertainment facilities, offices, and arts, culture, and tourism development. Broadly speaking, this covers uses falling within Use Classes A1-A5 and D1-D2.

**3.4.7** Whilst hot food takeaways (Use Class A5) are a recognised town centre use, the Council seeks to avoid their proliferation in the borough. Compared to other retail uses, they are more likely to have a detrimental impact on amenity and retail character. As set out in our Hot Food Takeaways Supplementary Planning Document and tested at various appeal decisions, harmful impacts can include: increased incidence of litter, smells, crime and antisocial behaviour, noise and general disturbance, parking, and traffic problems. Clearly such potential impacts do not sit comfortably with our aspirations for an attractive neighbourhood centre that encourages people to spend time in the area.

**3.4.8** Furthermore, the proximity of the neighbourhood centre to the proposed site of a new school (Site BHL2 South – Blackhorse Road/ Hawarden Road) could have negative impacts on community health. The potential availability of low priced unhealthy food close to a school could encourage and tempt young people to make unhealthy dietary choices on a regular basis. This would undermine the government's strategy of promoting healthier food choices in its document 'Healthy Weight, Healthy Lives: A Cross Government Strategy for England' (Jan 2008).

**3.4.9** The existing parade of retail units at the junction of Blackhorse Lane and Forest Road was surveyed in January 2012. Of 13 individual units, 2 can be clearly categorised as hot food takeaways, whilst a further unit operates as both a restaurant and takeaway. As these 3 units combined equates to 23% of the total existing parade, it is considered that it is not necessary to provide for any further such units in the new neighbourhood centre; given the concerns outlined above, and in the interests of securing a vibrant mix of uses.

**3.4.10** Similarly, betting offices are a use whose proliferation should be avoided. As set out in our Core Strategy, regular Police bulletins indicates such uses can be magnets for disorder, yet evidence suggests they have a growing presence in our town centres. A survey conducted in December 2011 found that since 2005, there had been a 39% increase in the number of betting offices operating in our designated centres. To ensure the vitality and viability of the new centre, the proliferation of such uses should be avoided. Any proposals for such use will need to be supported by strong evidence of an unmet local need.

**3.4.11** The scale of development at the neighbourhood centre is also important. It should only cater for local need, and not encourage trips from outside the area. Large comparison shopping facilities (i.e. non food shopping such as for electronic goods or clothing) will not be appropriate as these should be located in Walthamstow Town Centre in the first instance, or to a lesser degree, in our district centres. Limiting net retail areas to 1000m<sup>2</sup> should help discourage such use, as may the existing presence of such units at Tottenham Hale in Haringey.

**3.4.12** Whilst the Retail and Leisure Study advocates stores in the region of 500m<sup>2</sup> within the neighbourhood centre, it is considered that scope for a larger flagship store may be necessary to kickstart the centre, and ensure it fulfils its role as the main focus of activity in the locality. The recent permission for a Tesco's Express at the site of the Former Essex Arms Public House (Site BHL9) is in the region of 500m<sup>2</sup>, but is an edge of centre location. Provision is therefore needed for larger developments 'in centre'. Proposals that are likely to undermine aspirations for a new neighbourhood centre will need to be supported by a Retail Impact Assessment.

**3.4.13** In helping foster a sense of community, provision should be made for both indoor and outdoor meeting spaces. 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 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. In addition, outdoor spaces should take two forms. One is the proposed east-west green link through the Station Hub to Walthamstow Wetlands (see Section 3.6: Public Open Space and Nature Conservation). The second is more urban open space. Given the proximity to a major A road, the best way of achieving this is considered to be through internal courtyards to the north of Forest Road as detailed in the Urban Design Framework. This will enable an attractive public realm to be created, whereby new buildings effectively screen nearby road traffic. Money from the Outer London Fund will also be invested in the area around the station to ensure an enhanced public realm.

**3.4.14** 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 DM25: 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 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.

**3.4.15** The Council has invested in the public realm in the form of a corridor scheme that includes pavement widening and removal of street clutter. 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.

**3.4.16** It is recognised that some existing uses outside of 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 public house - The Warrant Officer, at number 318-322). Their loss to residential should therefore be resisted unless they can be re-provided within the designated parade.



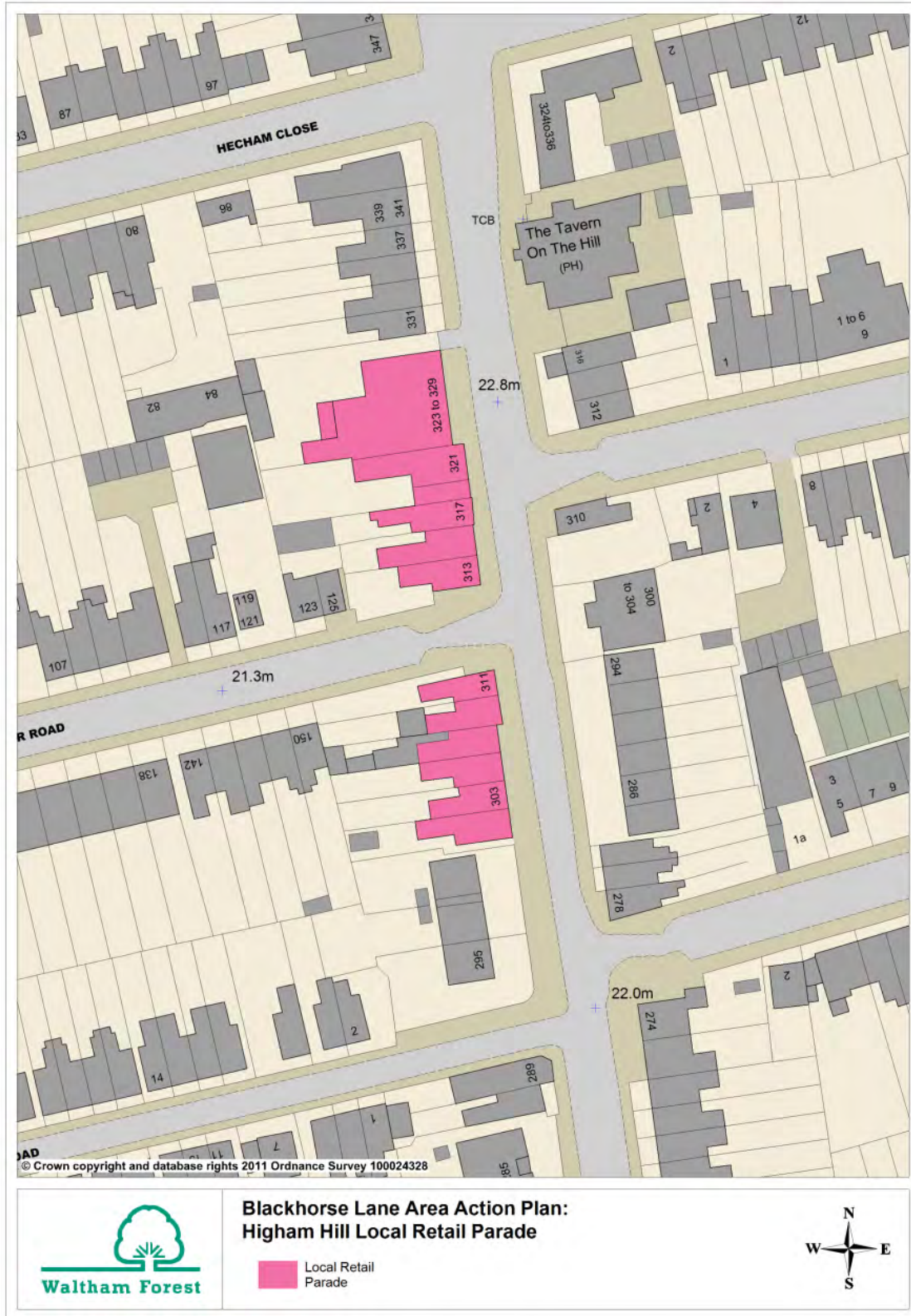


Figure 7 Higham Hill Local Retail Parade



**Figure 8 Billet Road Local Retail Parade**

**3.4.17** Where any proposals come forward for town centre uses outside of the neighbourhood centre or local retail parades, the onus will be on the applicant to clearly justify why the proposal should be considered favourably. They should be designed to meet a localised need only, and not result in any leakage from existing centres or parades.

**Relevant objectives:**

- Objective 1 – A Neighbourhood Centre
- Objective 8 – A Community Place

## 3.5 Design and Local Character

### Introduction

**3.5.1** The existing built fabric in Blackhorse Lane is of variable quality and generally low/ medium density. Historical development has largely turned its back on one of the areas main assets; the Lee Valley Regional Park. New developments offer opportunities to address this, upgrade the image of the area, and secure more efficient use of land in areas well served by public transport.

**3.5.2** Our Urban Design Framework (Maccreanor Lavington, 2011) has identified that there are a number of buildings and features within the urban grain that make a positive contribution to local character. Ensuring new developments respect this will be a key challenge as new development proposals emerge.

### **Policy BHL8: Design and Local Character**

New developments in Blackhorse Lane should:

A) ensure the highest standards 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;

B) reinforce and develop a network of connected streets that will form the principal means of access and movement within a regenerated area, and encourage walking, cycling, and the use of public transport;

C) where viable, integrate buildings of merit and ensure that new development is carefully integrated to respect and enhance existing built heritage;

D) ensure appropriate building heights that respond to the existing built context and adjacent landscape features. Across the AAP, building heights should normally be 3-6 storeys. At the key gateway site of BHL1: The Station Hub and Waterfront, some taller elements that exceed this range (up to but not exceeding 9 storeys) may be acceptable, subject to an exemplary standard of design. Tall buildings (i.e. 10 storey and above) will not be acceptable anywhere in the plan area.

E) ensure residential development has active frontages with front doors onto streets and windows that overlook them.

### **Justification and explanation**

**3.5.3** The Urban Design Framework for Blackhorse Lane, produced by Maccreanor Lavington in 2011, provides an assessment of the existing character of the area. This notes that the area displays a 'highly diverse built character.'

**3.5.4** The area contains a diverse mix of building types ranging from Victorian residential and industrial development, 1930's inter-war buildings and more recent contemporary housing. Some of the existing older industrial buildings are poor both in terms of their construction and visual quality.

**3.5.5** High quality design can secure an upgrade in the image of the area, which can then serve to encourage investor confidence; enabling more developments of the right type to come forward. Attractive developments that link well to their



surroundings and offer good quality public realm can also encourage people to stay in the area. This could help address current issues of population churn (see Section 3.2: Housing). The use of durable materials and minimal street clutter will be important in securing a high quality public realm that does not deteriorate quickly, and requires minimal long term maintenance costs. Such principles are already proving a success elsewhere in the borough as part of the Leyton Links project. The Council will utilise money from the Outer London Fund to enhance the public realm; through projects such as enhanced footpaths at the Sutherland Road area and the installation of public art at the blank gable at the junction of Blackhorse Lane and Forest Road. To ensure public realm works come forward in a coordinated manner, a Public Realm Masterplan for the Sutherland Road area is being prepared.

**3.5.6** The surrounding landscape also provides an opportunity for a strong underlying natural theme that emphasises links to Lee Valley Regional Park; rather than turns its back on it in the way some historical developments have. The use of street trees and landscaping will therefore form an important element of the public realm.

**3.5.7** The existing built form of the Blackhorse Lane area means that permeability through the area for pedestrians and cyclists is poor; particularly in terms of east-west movements. An underlying principle of new developments is to exploit opportunities for improved access to the wider environment and unique landscape for residents and visitors. The current built form has largely turned its back on the Lee Valley Regional Park, with imposing industrial buildings providing a barrier to public access.

**3.5.8** A move towards a mixed use environment (whilst also retaining some important industrial areas as discussed in Section 3.3: Employment) means that such barriers can be addressed as requirements for large warehouses, service yards, and private access roads is rationalised. Mixed use developments can instead secure a network of connected streets that improves movement through the area for all. Gearing these particularly towards pedestrians and cyclists will also help optimise opportunities for sustainable living when twinned with availability of public transport. In enhancing the image of the area and transforming it to an area where people choose to spend time, the quality of this public realm and its relationship to new and retained buildings is as important as the design and materials palette of individual buildings. It will also be consistent with aims of the Mayor's Transport Strategy; that streets are designed and managed as 'streets for people', emphasising their function as social spaces. In securing 'streets for all', traffic calming measures will be necessary as increased permeability can sometimes run the risk of encouraging 'rat-running' by private cars.

**3.5.9** As set out in the Urban Design Framework, whilst the overall quality of existing developments across the area is variable, there are some existing buildings that make a positive contribution to local character. In some instances these already accommodate productive uses, whilst others offer scope for refurbishment. Buildings identified in the Urban Design Framework include:



- The Tryst Public House and Royal Standard Music Venue
- Kings Family Network, 57-61 Blackhorse Lane
- The Old Station Café, 16 Blackhorse Lane (which was also added to the Council's Local List in November 2012).

**3.5.10** The location of each is shown in figure 9. This includes the Tryst Public House and Standard Music Venue discussed in the previous chapter. In addition, units 1-7, and 63-69 (odd numbers) Sutherland Road offer scope for refurbishment and conversion into employment uses more compatible with surrounding residential; such as creative and light industry such as those already present at units a-k Blackhorse Mews. Meanwhile, in the Lee Valley Regional Park, to the west of the built up area, the Marine Engine House is locally listed and the Old Coppermill is listed. Details of both are provided in section 4: Opportunity Sites.

**3.5.11** It is noted that none of the buildings in of merit in figure 9 above are statutorily listed or fall within a Conservation Area. They are therefore not offered statutory protection. However, where it is viable to incorporate them into redevelopment opportunities, they can help reinforce and strengthen local identity, character and sense of place, ensuring the area is distinct from other modern developments. This is consistent with our approach set out in Core Strategy Policy CS12, which promotes heritage led regeneration.

**3.5.12** Existing building heights are predominantly 2-3 storeys. This provides somewhat low/ medium densities and inefficient use of land given the areas status as a key growth area, and the availability of public transport. Recent developments such as Papermill Place signal a shift towards higher densities. That scheme in particular, demonstrates how higher densities can be achieved in modern developments without compromising design quality.

**3.5.13** Policy CS15 (Well Design Buildings, Places and Spaces) from our adopted Core Strategy sets out that 'tall' (10 storey +) and 'taller' (5-9 storey) buildings may be appropriate on specific sites in the borough's key growth areas, including Blackhorse Lane. However, the Urban Design Framework considers that tall buildings are problematic close to SSSI and SSA designations, and recommends building heights of 3-6 storeys in order to strike a balance between optimising densities and being sensitive to the existing built fabric. Recent planning permissions at Site BHL1 (The Station Hub and Waterfront) include developments that partially exceed this range. In this context, whilst new developments in the area should normally be 3-6 storeys, there may be some scope for an element of taller buildings at Site BHL1 (Station Hub and Waterfront), where these can act as landmarks and contribute to good placemaking, by adding to the legibility of the area.

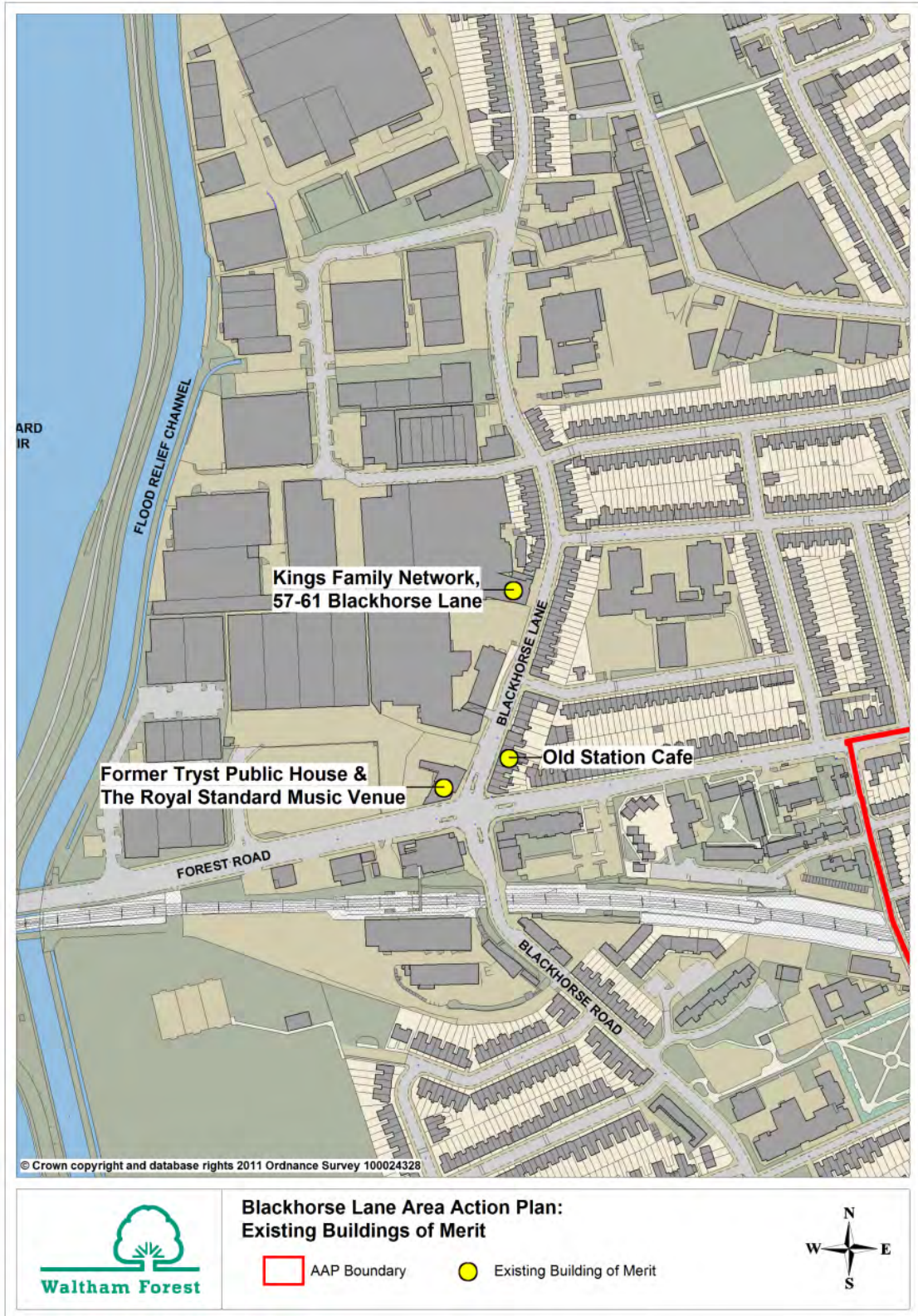


Figure 9 Buildings of merit

**3.5.14** Where additional height is proposed, schemes should be exemplars of design quality, demonstrate that they would have no potential effect, either directly or indirectly, on the Lee Valley SPA and RAMSAR sites and on the Walthamstow Reservoirs Site of Special Scientific Interest, and address the detailed criteria set out in Development Management Policy DM31 - Tall Buildings. Any such development would also need to pay careful consideration to its interrelationship with existing buildings of merit such as the Tryst Public House and Royal Standard Music Venue.

**3.5.15** Providing active frontages to properties will avoid the occurrence of dead space and aid natural surveillance. In mixed use schemes, this can help ensure alternative uses compliment each other in terms of amenity and safety. This can be particularly important in realising aims to improve public access to the natural landscape, without compromising the security of businesses and properties. It also complies with the principles of 'designing out crime' which is a requirement of Core Strategy Policy CS16: Making Waltham Forest Safer.

### **Relevant objectives:**

- Objective 4 – A Well Designed Place

## **3.6 Public Open Space and Nature Conservation**

### **Introduction**

**3.6.1** A series of open spaces are located within the Blackhorse Lane area, including playing fields, allotments, parks, and watercourses. It also includes a significant portion of the Lee Valley Regional Park. Despite this, the area has a largely urban feel, and is identified as deficient in access to both nature and open space, as shown in figure 10. Whilst sites such as Higham Hill Recreation Ground, Stoneydown Park, and Coppermill Park all offer public access (see figure 11), there are a number of outdoor sports facilities and allotments with only limited access.

**3.6.2** Walthamstow Reservoirs, part of the Walthamstow Wetlands project, are an exceptional and extensive blue/green asset adjoining the Blackhorse Lane area. Together with the wider Lee Valley Regional Park they potentially offer access to nature, leisure and recreation for local residents, workers and visitors. They could also be an important resource for education. However, it is important that any such gains are balanced against their nature conservation and biodiversity value, due to Site of Specific Scientific Interest (SSSI), Ramsar site and Special Protection Area (SPA) designations. The boundary of the Walthamstow Wetlands project area is shown in figure 12.



# Blackhorse Lane AAP Incorporating Modifications

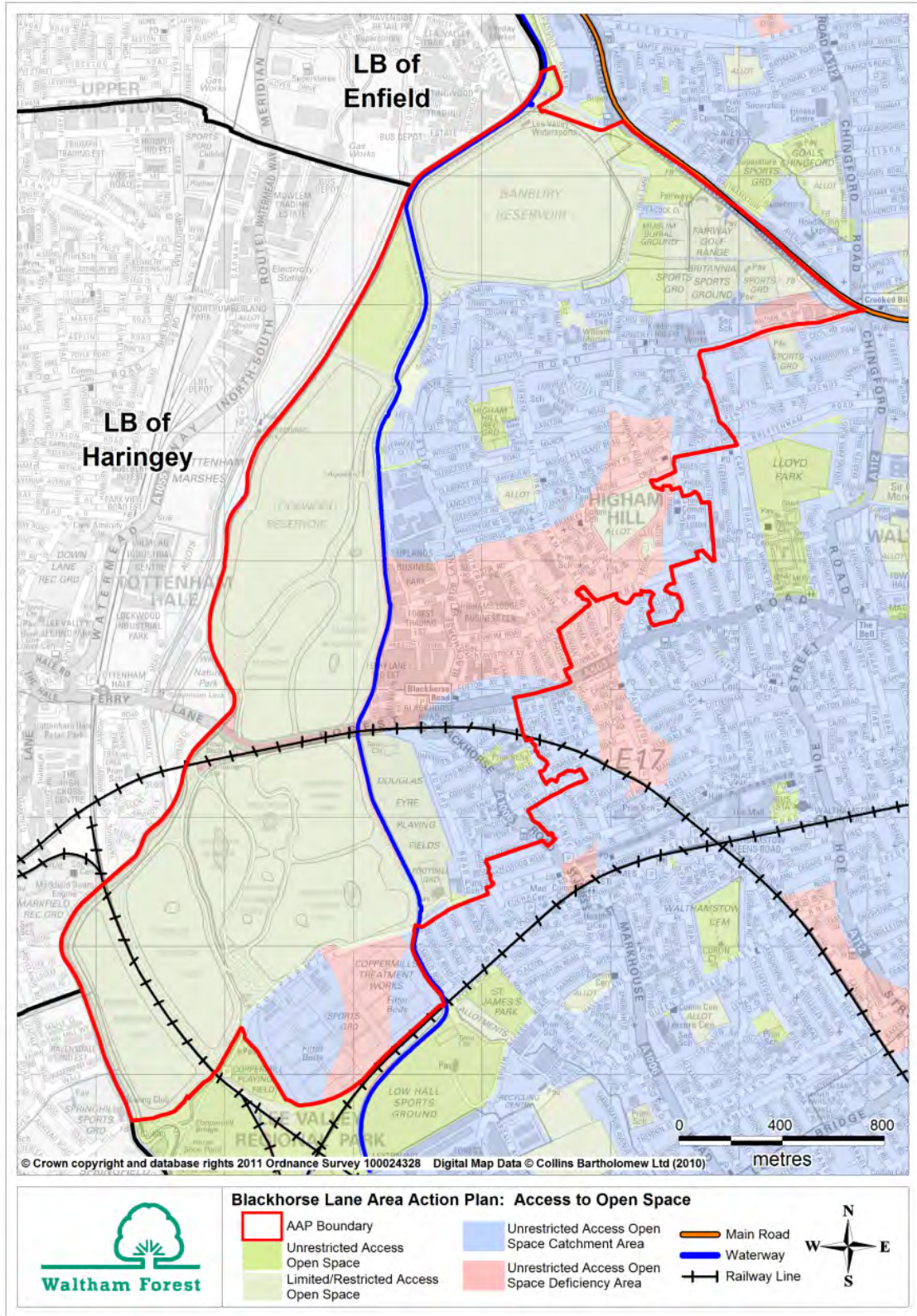
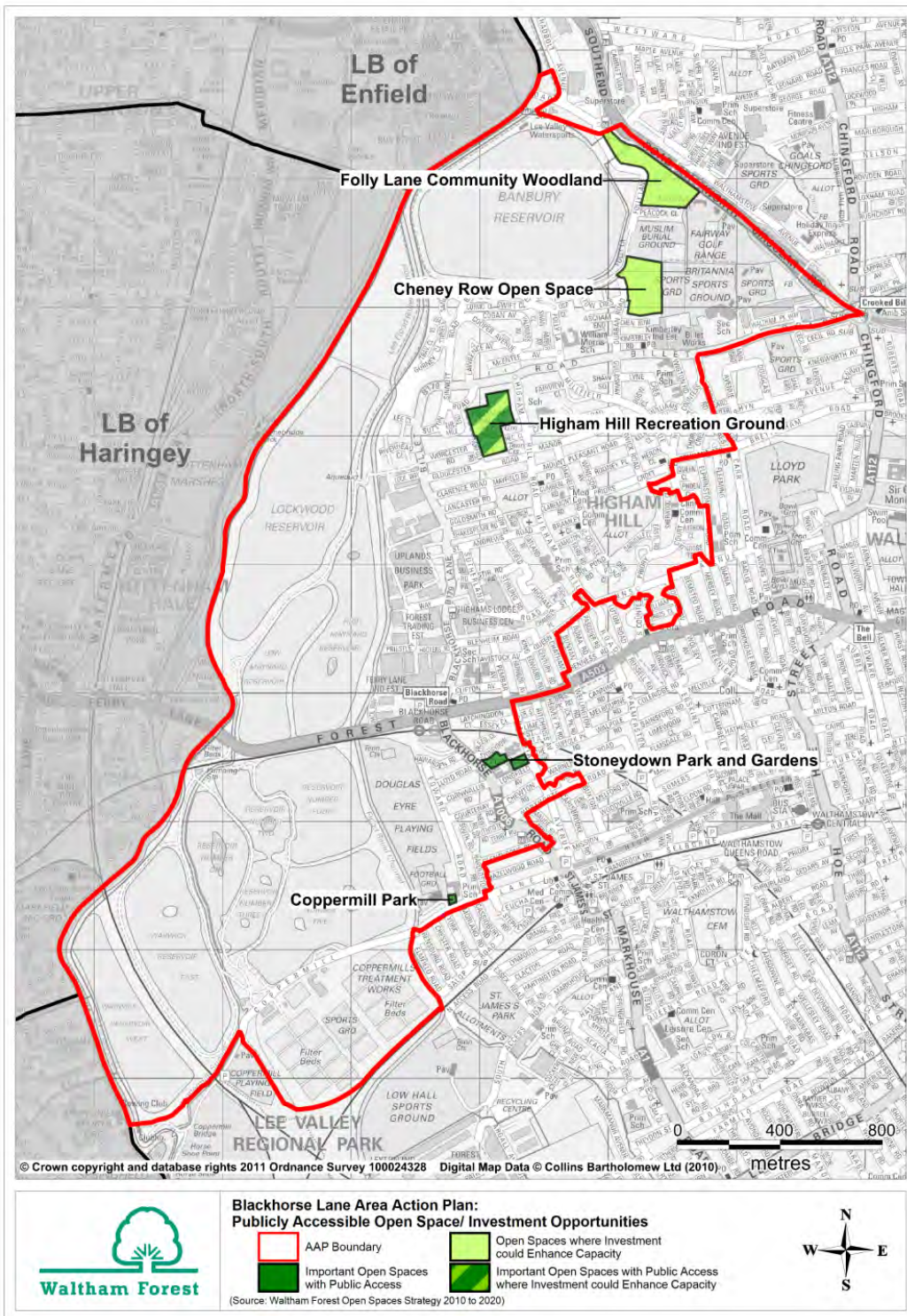


Figure 10 Existing levels of access to open space



# Blackhorse Lane AAP Incorporating Modifications



**Figure 11 Open spaces with public access & where investment could enhance capacity**

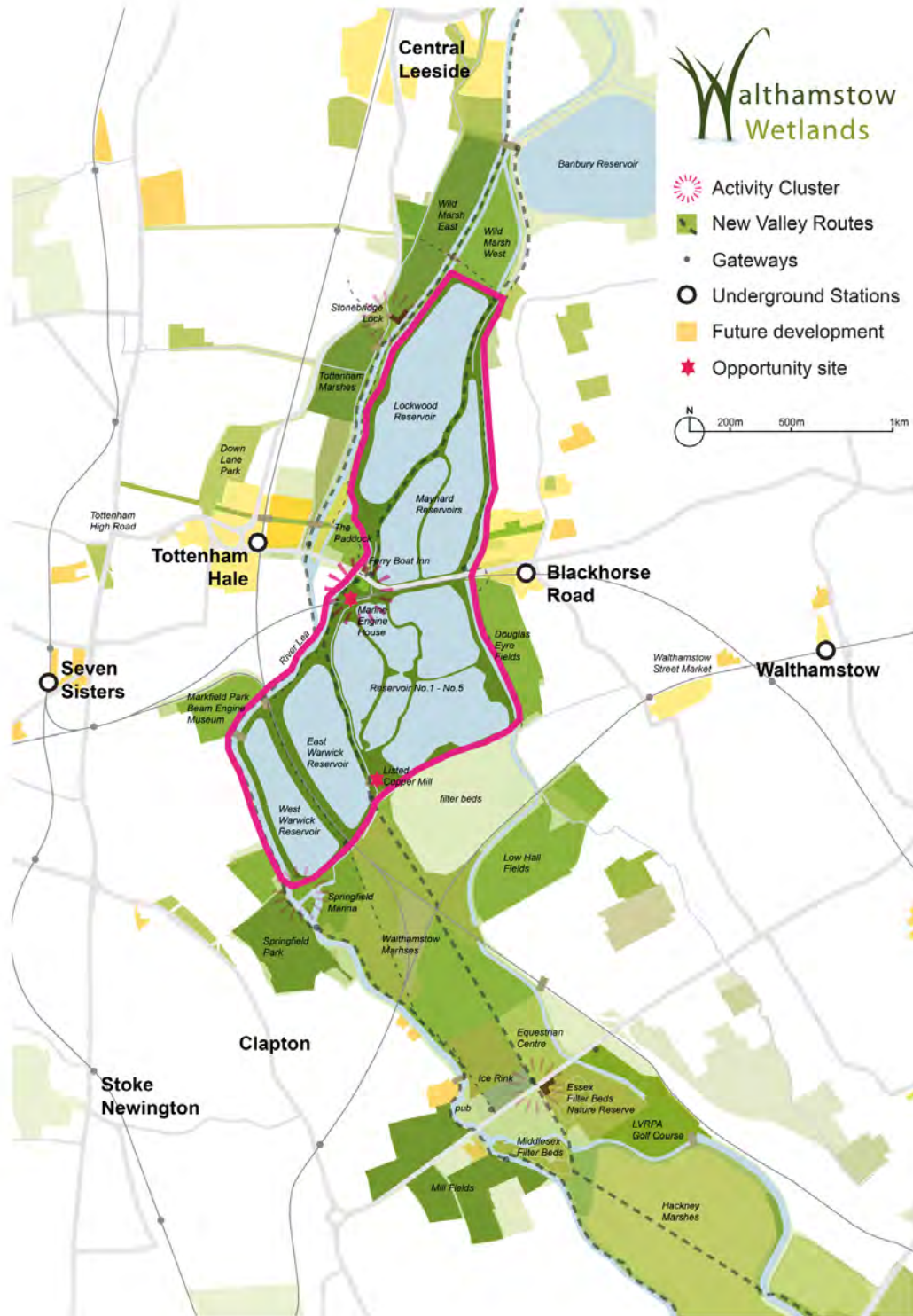


Figure 12 Walthamstow Wetlands in context



## Policy BHL9: Open Space and Nature Conservation

A) New developments in Blackhorse Lane should:

i) provide new green public open space, and appropriate landscaping, to ensure new development has a 'green signature' and to provide opportunities for social interaction and help alleviate flood risk. Play facilities should also be sought in appropriate cases;

ii) be designed to respect the setting of the natural landscape, particularly along the valley edge, and improve physical, visual and intellectual access to the Lee Valley Regional Park and Walthamstow Wetlands.

iii) avoid any negative impact on Lee Valley Special Protection Area and Ramsar site and other sites of importance to nature conservation, including watercourses. In exceptional circumstances a development causing negative impacts may be permitted, but only where appropriate mitigation for any harm has been provided, and no adverse impacts on the integrity of the Lee Valley Special Protection Area/ Ramsar Site would result;

iv) incorporate measures to enhance biodiversity, such as green/ brown roofs, wildlife-friendly landscaping, tree planting, creating green corridors along watercourses, bird nesting and roofing spaces;

v) provide financial contributions towards projects that enhance the quality of open space and public access to it, in particular the Lee Valley Regional Park and Walthamstow Wetlands.

B) Existing open spaces in the area should be protected and enhanced. Opportunities for increased public use will be welcome.

C) To enhance biodiversity, water quality and public enjoyment, opportunities to open up and naturalise the Dagenham Brook will be supported.

D) Development proposals that help protect and enhance the ecological integrity of the Lee Valley Special Protection Area/ Ramsar Site, in order to sustain the complex habitats and the levels of populations for which it was classified, will be supported.

E) The area shown in figure 13 is no longer designated as a playing field.

## Justification and explanation

**3.6.3** Successful open spaces are fundamental to sustainable growth. If well incorporated into developments, they can act as a common space and shared asset that helps support social cohesion allowing communities from different backgrounds to meet and mix. In preparing this AAP, the need for a 'sense of community' has been highlighted by local residents. Whilst a new neighbourhood centre will go some way to offering urban space for people to mix, the landscape character of green spaces along the western and northern fringes of the area is a key asset that new developments should utilise.

**3.6.4** Providing new public open spaces and appropriate landscaping will help signal a better relationship with Walthamstow Wetlands and the Lee Valley Regional Park, and help address climate change. Such measures can create locally distinctive landscapes, ecological/ green connections, and enable wildlife to flourish. Some features could also provide additional functional benefits, such as flood mitigation; by 'making space for water' within developments. Alongside the encouragement of green industries, this can make a positive contribution for the successful transformation to an area with high green credentials.

**3.6.5** New open spaces could also include play areas and natural greenspaces close to where people live and work, to provide opportunities for physical activity, relaxation, healthy living, and general well-being. Opportunities for increased walking, cycling, play, recreation and leisure are all compatible with the aims of the Lee Valley Park Plan, and can enhance quality of life. Play spaces should be designed to maximise their use, following principles set out in the Play England guide 'Design for Play: A Guide to Creating Successful Play Spaces'.

**3.6.6** A full range of attractive and well functioning open spaces throughout the area will help overcome a largely grey and uninviting area that is currently dominant within the urban fabric. This could help boost investor confidence and further improve opportunities for regeneration and investment, since access to open space can increase land values, as set out in the CABI publication 'Does money grow on trees?' (2005). It is also consistent with aspirations of the All London Green Grid SPG (Design for London, 2012), that a shift from a grey to green infrastructure will secure environmental, social, and economic benefits.

**3.6.7** In addition to providing new green spaces, such as the new pocket park at Sutherland Road (see section 4: Opportunity Sites), improved public access to Walthamstow Wetlands and Lee Valley Regional Park should be an underlying theme to developments. This will compliment the provision of new spaces as part of a co-ordinated approach to tackling the stark urban environment. Intellectual access refers to an enhanced understanding of an area, including its historical context, through matters such as appropriate signage and information. Enhancing such access



will help give the area a better sense of place. Where developments do not facilitate improved physical and intellectual access, their designs should at least seek to improve and exploit visual links to these major assets.

**3.6.8** Walthamstow Reservoirs is a fully functional site, used by Thames Water for London's Water supply. Their full extent is shown in figure 12. It is recognised that the functional aspects of the site will need to be considered when introducing public access. Appropriate measures will need to be introduced to ensure that access arrangements do not impact on the sites primary function.

**3.6.9** All waterbodies in the area form part of London's Blue Ribbon Network, which provides corridors for both wildlife and recreation as set out in the London Plan. Due to their function as a crucial habitat for wildlife, it is important that any new developments do not lead to the degradation of water quality, in line with the Water Framework Directive (2000).

**3.6.10** The Lea Valley is one of the key routes for migrating, wintering and breeding birds in the Greater London area and as such acts as a refuelling site and safe haven for tens of thousands of birds, primarily because it offers an extensive expanse of wetland marsh and waterways. This environmental value has been recognised through the designation of the reservoirs as a Site of Special Scientific Interest (SSSI). In addition the reservoirs are designated under European law as part of the Lee Valley Special Protection Area (SPA) which is also considered to be a wetland of international importance under the Ramsar Convention.

**3.6.11** It is therefore imperative that both developments in the locality, and our aspirations for improved public access, are dealt with sensitively. Where individual planning applications come forward, depending on the scale and location of proposals, a Habitat Regulations Assessment may be required. This should identify potential disturbance to natural habitats both during the construction phase and in the long term. Any proposals that cause harm or disturb established habitats will need to be supported by very strong demonstrable benefits, and if this is considered to outweigh potential harm, mitigation such as habitat recovery and relocation will be necessary. Any proposals would need to demonstrate that no adverse effects on the integrity of the Lee Valley Special Protection Area/ Ramsar Site would result.

**3.6.12** Respecting and enhancing the biodiversity of the area in new developments will be expected. For example design features such as green/ brown roofs, bird nesting and roofing spaces will all enhance the green credentials of the area. This will underline an emerging 'green signature' in the area, and help ensure new developments enhance rather than detract from, the existing nature conservation value of their surroundings. This is consistent with the objectives of our Core Strategy to protect and enhance biodiversity.

**3.6.13** As new developments come forward, there will be an increased need for open space in the area. Where this cannot be provided on site, financial contributions will be sought towards improving existing public open space in the vicinity of the development in order to enhance its capacity. The proximity of Lee Valley Regional Park and Walthamstow Wetlands to a number of sites likely to come forward for development, along with the scale of these areas of open space, means that these will in most cases be the logical areas to focus such investment. It should be noted that where amenity space is provided on site, this may not be sufficient to cater for increased demand in the area and financial contributions will still be sought.

**3.6.14** Whilst the Lee Valley Regional Park and Walthamstow Wetlands offer major potential gains to the local community, other open spaces in the area are also of value. Our Open Space Strategy has highlighted that there is potential for investment in existing open spaces at Cheney Row, Folly Lane Community Woodland, and Higham Hill Recreation Ground (all shown in figure 11) in order to enhance their capacity. Investment in Cheney Row and Folly Lane Community Woodland are also highlighted in the Lee Valley Park Development Framework. As part of its regeneration programme, the Council is investing in environmental improvements to Higham Hill Recreation Ground.

**3.6.15** Investment aimed at enhancing access to and quality of existing open spaces along with provision of new open space within new developments, will ensure the health benefits of better quality useable open space are distributed fairly across the Blackhorse Lane area.

**3.6.16** The Dagenham Brook (shown in figure 14), is a tributary to the River Lee that runs alongside the Flood Relief Channel. Within the Blackhorse Lane area, much of it is culverted. Not only does this raise maintenance issues (i.e. impact of any blocked debris), it also eliminates any potential amenity and biodiversity value this watercourse could bring to the area. Opening up and naturalising the Brook could therefore help enhance the setting and green credentials of the area; which will further underline the 'natural signature'.

**3.6.17** 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 overcome 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. As the site also falls within the Lee Valley Regional Park, any proposals should also conform with the Park Development Framework.

### **Policy BHL10: Walthamstow Wetlands and Lee Valley Regional Park**

A) We will work with partners to promote and deliver Walthamstow Wetlands as an urban wetland nature reserve and visitor centre for the benefit of local residents and to support the wider visitor economy. Improved access to open space, and enhancement of the sites natural and industrial heritage will be achieved by:

i) securing improved public access to Walthamstow Wetlands; through the provision of a new pedestrian and cycle route connecting to the Lee Valley Path, and more legible circulation through the site; and enhanced entry points at 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 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.

iv) pooling funding from a range of sources, including developer contributions where appropriate.

B) We will also support and work with the Lee Valley Regional Park Authority and other stakeholders to deliver the proposals set out in the Lee Valley Park Plan 2000 and Park Development Framework where these will help to integrate the Walthamstow Wetlands with the wider Regional Park. Proposals to enhance and redevelop visitor facilities including new visitor accommodation should be developed to complement the whole Park, extending to the Queen Elizabeth Olympic Park as one visitor destination.

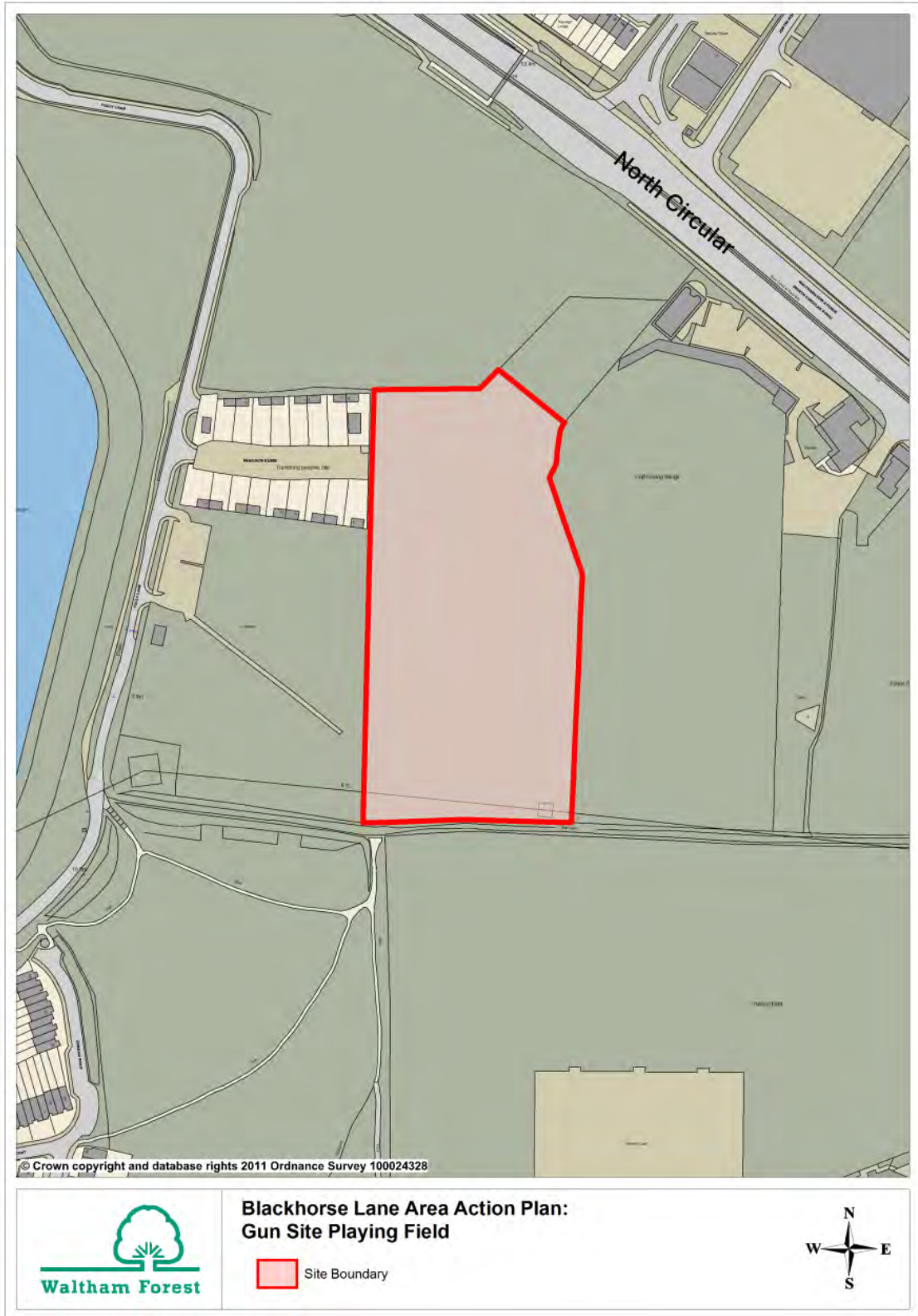
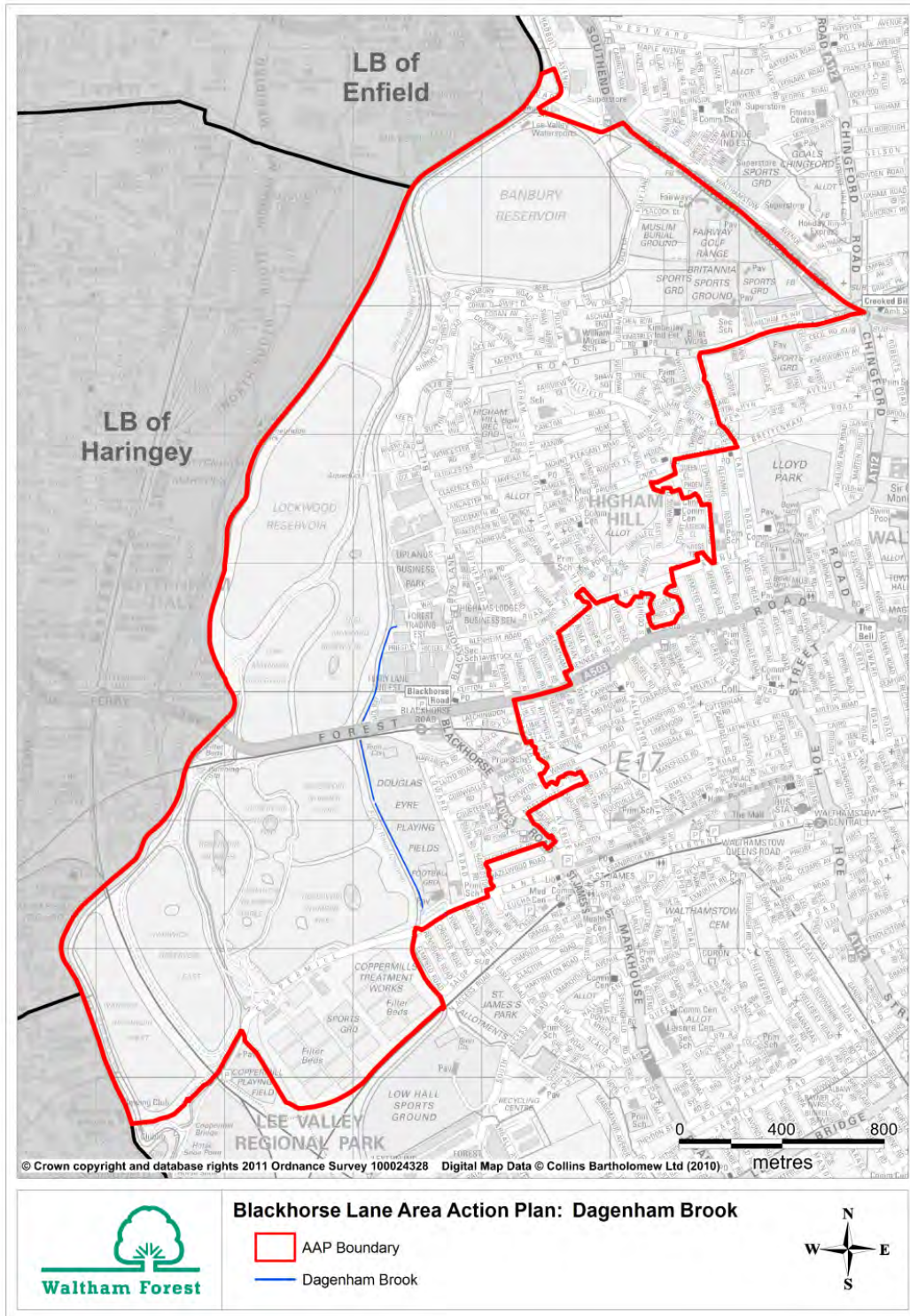


Figure 13 Former Gun Site Playing Field



# Blackhorse Lane AAP Incorporating Modifications



**Figure 14 Location of the Dagenham Brook**

## Justification and explanation

**3.6.18** Walthamstow Wetlands comprises of ten reservoirs, which form part of a larger chain of reservoirs along the Lea River Valley. This chain is the largest single man-made body of water in London. The reservoirs are owned and managed by Thames Water and as well as being used for the supply of drinking water, are a well established fishery. Recently described by the Mayor as ‘London’s best kept secret’, public awareness and access to the reservoirs is poor. Together with the wider Lee Valley Regional Park the reservoirs offer a valuable resource that can greatly enhance the setting of new developments and improve the quality of life of the wider community.

**3.6.19** The reservoirs have the necessary physical infrastructure and natural characteristics to make the prospect of developing them into an urban wetland nature reserve an attractive and obvious proposition. Approximately 310,000 people live within a two mile radius of the reservoirs, and this figure is set to grow as the result of regeneration efforts in Waltham Forest, Haringey and Enfield. Nestled between Tottenham Hale and Blackhorse Road Stations, the excellent public transport links mean the site can be sustainably accessed by visitors from further afield. Opening Walthamstow Wetlands to wider public access and establishing the site as a nature reserve is one of the Council’s objectives, which it is seeking to deliver through a partnership with Thames Water and key agencies. Developments in Blackhorse Lane can both contribute to, and benefit from this initiative.

**3.6.20** 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. The project won the London Planning Awards 2012 under ‘best conceptual project’ category.

**3.6.21** 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. Sensitive wildlife areas will be protected through appropriate mitigation. The access management strategy will include low key gates at strategic 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.

**3.6.22** 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. Managed access and

circulation 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. 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.

**3.6.23** 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, that will create a new east-west link into the Wetlands. The location of the linear park, and an indicative location of the proposed viewing platform 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.



# Blackhorse Lane AAP Incorporating Modifications

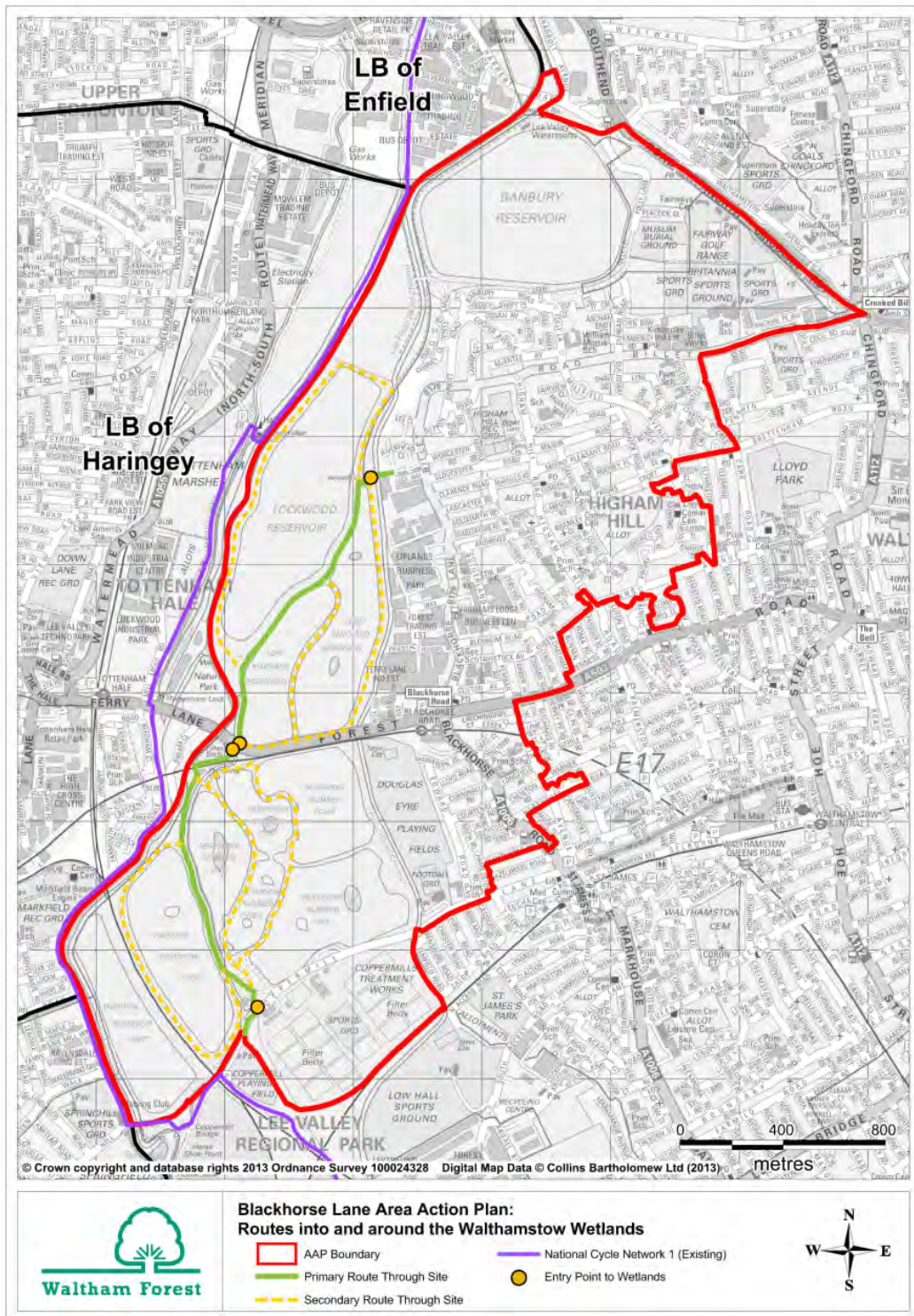


Figure 15 Routes into and around the Wetlands





Figure 16 East-West link through the Station Hub

**3.6.24** The Marine Engine House was originally a pumping station and is located near the entrance to the Wetlands at Forest Road. The building is architecturally distinctive and is locally listed. It is partially in use as a workshop, but largely vacant; making it vulnerable to dilapidation. Its location offers opportunities for refurbishment and re-use as an educational resource and wetland centre. Major benefits of doing so include:

- Bringing a redundant building of heritage value back into productive use;
- Creating educational opportunities for adults, and local schools and promoting learning about the sites natural and industrial heritage and water sustainability (previous consultation exercises have highlighted an appetite amongst local schools for improved access to the reservoirs for educational purposes);
- Create an amenity in the Wetlands which will encourage access by the wider community including families and young children;
- Promote sustainability by utilising existing infrastructure to support the Walthamstow Wetlands project.

**3.6.25** 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 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.

**3.6.26** Further details of proposals for the future use of these buildings are set out in Section 4: Opportunity Sites. Their location is highlighted on figure 12.

**3.6.27** 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.

**3.6.28** Funding the Walthamstow Wetlands project will require pooling from a range of sources. A round one application was submitted to Heritage Lottery Fund in February 2012 and partnership funding has been identified from Thames Water and the Environment Agency. The partnership is also developing a strategy to ensure the long-term financial sustainability of the site including developer contributions towards the project. Requiring such funds would be compliant with CIL regulations; since the project will help address need for open space generated through new developments, and help overcome the lack of opportunities for provision of significant areas of new open spaces in the area.

**3.6.29** A significant area of the Lee Valley Regional Park lies within the Blackhorse Lane area. The Lee Valley Regional Park Act 1966 gives the Lee Valley Regional Park Authority a statutory responsibility to provide directly or with partners facilities for sport, recreation, leisure, entertainment and nature conservation throughout the Park. Under section 14 of the Park Act, we have a duty to include the Regional Park Authorities proposals in our planning policies. 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>

### Relevant objectives

- Objective 3 – A Green Place

## 3.7 Flood Risk

### Introduction

**3.7.1** Blackhorse Lane is an area in need of regeneration, but it is also an area that is vulnerable to flooding. Some key sites within the area fall within flood zones 2 and 3a, as identified by the Environment Agency. A balanced approach is therefore needed that neither precludes regeneration, nor increases the current level of risk to human safety.

**3.7.2** The Dagenham Brook also falls within the area covered by the AAP (see figure 14). It is important that new development does not compromise its role, and opportunities to enhance its function and amenity value are taken.

#### Policy BHL11: Flood Risk

A) New developments in Blackhorse Lane should be designed and sited to minimise and reduce flood risk to new and existing communities.

B) Basement dwellings will not be permitted, in the interests of avoiding groundwater flooding issues.

C) All sites in flood zones 2 or 3, and any other sites over 1 hectare, should be accompanied by a site specific flood risk assessment. This should be used to ensure new developments minimise risk through matters such as:

- i) incorporating Sustainable Urban Drainage Systems (SuDs) to achieve Greenfield run-off rates, including maintenance schemes to ensure their long term effectiveness is not compromised;
  - ii) configuring road and building layouts to preserve and improve existing flood routing;
  - iii) raising habitable floor levels to an appropriate height above the maximum flood water level;
  - iv) using flood resistant or resilient construction techniques dependent on likely depth of flooding;
  - v) providing safe routes to and from properties, and evacuation strategies, so that site users and residents have a means of safe access and egress during times of flood
- D) Where any development is proposed in areas susceptible to a 1 in 100 year flood event, taking account of climate change (as shown in figure 17), provision should be made for an equal level of compensation storage in the local area to mitigate for this loss. This compensation must be level for level and volume for volume and not alter flooding mechanisms or increase flood risk offsite. Compensation must also be able to account for climate change.
- E) Only water compatible and essential infrastructure uses (as defined by national policy and associated technical guidance), will be allowed in flood zone 3b.
- F) Where development is proposed near the Dagenham Brook:
- i) No new development should be built over the Dagenham Brook Culvert;
  - ii) All development should be set back at least 4 metres from the edges of the culvert and 8m from the open sections of the Dagenham Brook;
  - iii) Opportunities should be investigated to open up the culvert and naturalise the banks of the watercourse and implemented where possible.

### Justification and explanation

**3.7.3** The need for regeneration of Blackhorse Lane is well established, and as such it is identified as a key growth area in our Core Strategy. Flood risk is one of many issues in the area, and a balanced approach is needed. To avoid new development in Blackhorse Lane on flood risk grounds would do little to address deprivation, or minimise existing levels of risk. Instead it will be more beneficial to



both existing and new communities to use new developments as an opportunity to minimise or reduce existing levels of surface water flooding, whilst also siting more vulnerable uses away from areas of highest risk.

**3.7.4** Our Level 2 Strategic Flood Risk Assessment does not advocate the construction of new, large scale flood defence infrastructure. This is due to the probability that such measures relocate problems to adjacent areas; such as the Northern Olympic Fringe; which is also a key growth area. Instead, wherever possible, new developments should be directed to sites of lowest flood risk, and designed to make space for water. Such an approach will minimise and reduce future risk to occupiers of both new and existing properties.

**3.7.5** It should be noted that there are sites within the AAP that are being advocated for development, despite known flood risk. Most notably, part of the Station Hub and Waterfront (Site BHL1) is identified at risk in our Level 2 Strategic Flood Risk Assessment. Reasoning of why this is considered an exceptional circumstance, where there are overriding benefits to development, is detailed in the Opportunity Sites section of this document. Sensitive designs that give due consideration to making space for water, will obviously be critical as detailed proposals are drawn up. Proposals that do not adequately mitigate for the risk posed by development will not be supported. The extent of flood zones in the AAP area are shown in figure 18.

**3.7.6** Basement dwellings are particularly vulnerable to flooding. Given that there is an established risk in the area, they are therefore unacceptable due to the likely danger this would pose to occupiers.

**3.7.7** Since there are no planned new large scale flood defence infrastructure to protect new and existing properties, Site Specific Flood Risk Assessments will be important in ensuring development proposals take the necessary measures to minimise and reduce risk to human safety through their design. Whilst our Level 2 Strategic Flood Risk Assessment provides a useful starting point for informing these assessments, it is worth noting that once it is available, The Environment Agencies two-dimensional modelling study of the Lower Lee Valley will provide a more thorough assessment of levels of risk, and should therefore also be used to inform detailed development proposals.

**3.7.8** Minimising risk takes two forms. The first is to seek to prevent major risks through making space for water within new developments. This includes using permeable surfaces to allow for natural drainage, providing storage ponds, and enabling direct movement of water to storage/ drainage areas that does not affect other properties. The second is to minimise damage caused by any flood. This includes: raising habitable floor levels so that damage to properties and risk of injury are minimal, providing safe routes to and from properties in the event of a flood, and taking account of likely flood depths to determine if properties should be designed to keep water out of a property, or where this could cause structural damage, allowing it to enter the property.

**3.7.9** When raising floor levels is considered an appropriate course of action, finished floor levels should be set at least 300mm above the 1 in 100 chance in any year flood level, taking the effects of climate change into account. This is based on advice from the Environment Agency, and will ensure risk of damage to property is suitably minimised.

**3.7.10** The level of growth proposed in the areas around Blackhorse Road Station, which is logical in terms of aiding sustainable travel patterns, means building footprints could increase in areas already susceptible to flooding. This is especially true when likely impacts of climate change are factored in; as shown in figure 17. Where such proposals come forward, to ensure there is no increase in flood depths, compensatory storage should be provided on a level for level and volume for volume basis nearby. Failure to provide appropriate mitigation in this respect would result in proposals that increase flood risk in the locality, meaning they could not be supported.

**3.7.11** As can be seen in figure 18, in Blackhorse Lane, Flood zone 3b is broadly defined as the areas covered by the River Lee Flood Relief Channel and the Dagenham Brook. To minimise risk to human health, land uses here are limited to matter such as essential utilities infrastructure that must remain operable in a flood, amenity space and outdoor recreation, and flood control infrastructure. This means that existing uses within the designation are supported, and in principal the proposals set out elsewhere (see Section 3.6: Public Open Space and Nature Conservation) for a new towpath along the waters edge, and bridge into Walthamstow Wetlands, can be supported. This is because such uses should not increase flood risk or prevent the functional floodplain (i.e. flood zone 3b) from performing its intended purpose by reducing storage volume or impeding water flow.

# Blackhorse Lane AAP Incorporating Modifications

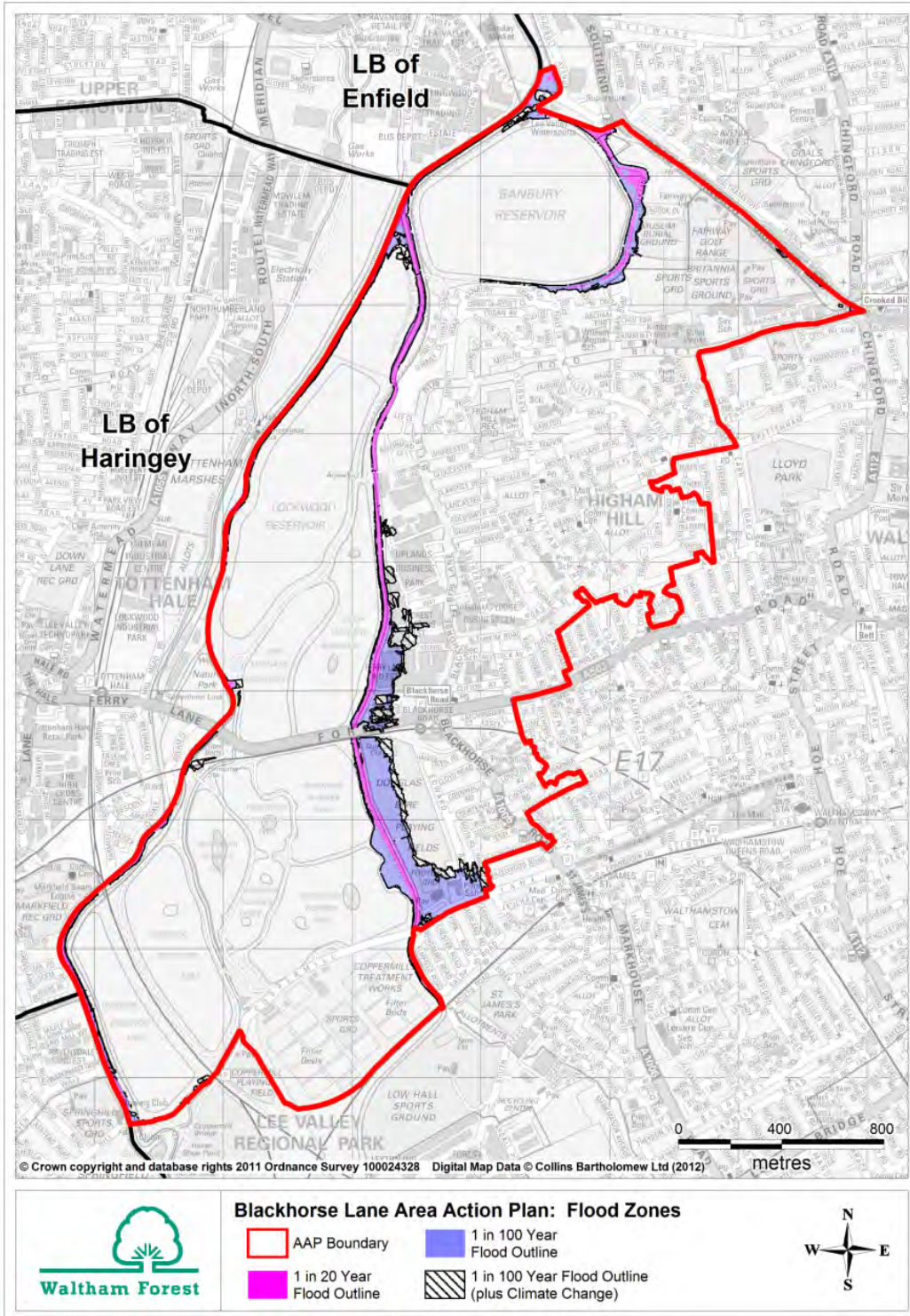


Figure 17 1 in 100yr plus climate change



# Blackhorse Lane AAP Incorporating Modifications

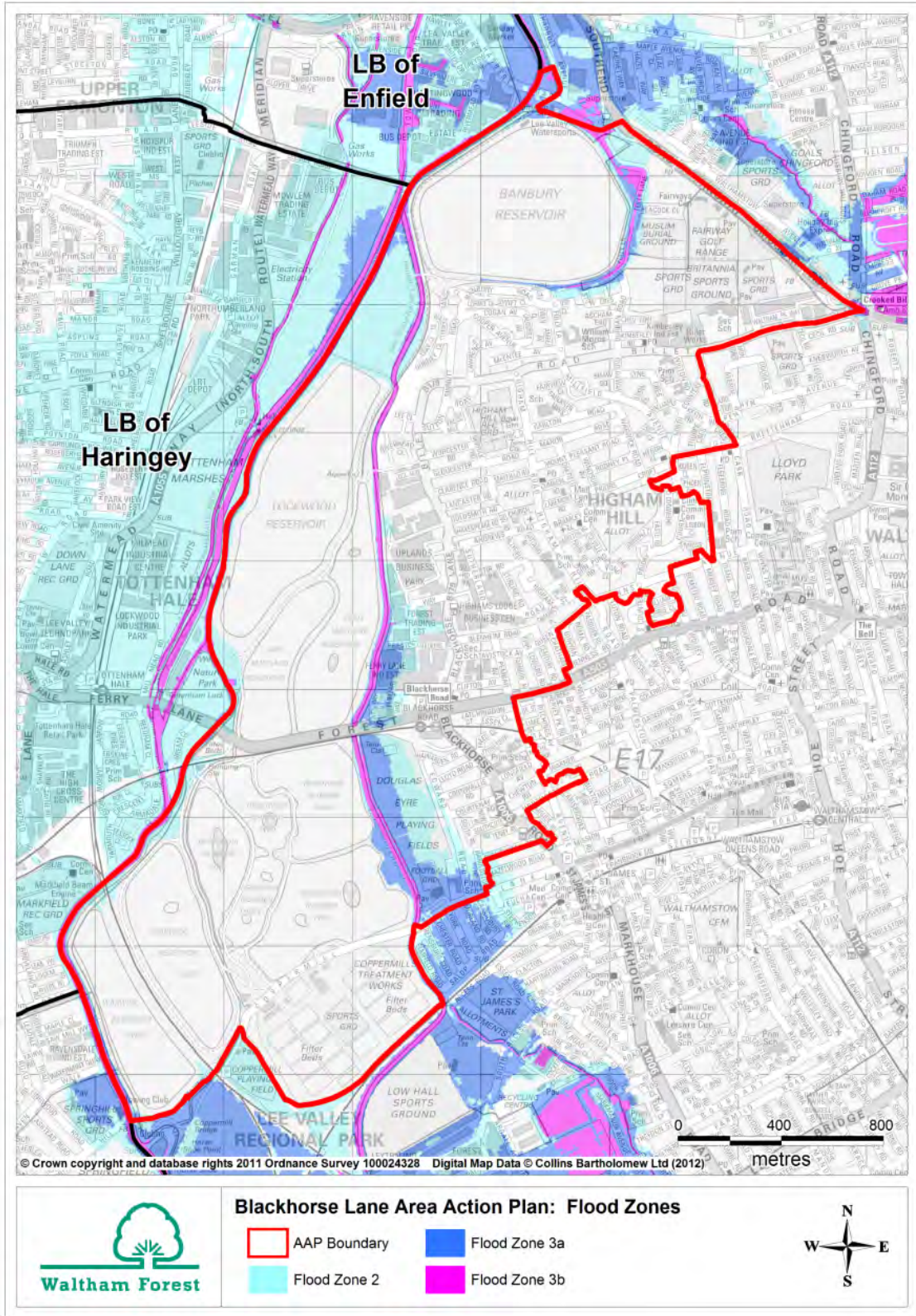


Figure 18 Flood zones



**3.7.12** The Dagenham Brook is a heavily urbanised tributary to the River Lee. Areas around it are susceptible to surface water flooding, causing some of the highest flood depths in the borough, as evidenced by our Level 2 Strategic Flood Risk Assessment. A cautious approach of providing a generous set back from the Brook in any new development, is therefore necessary to minimise the level of risk to people and property.

**3.7.13** Within the Blackhorse Lane area, much of the Dagenham Brook is culverted. This raises maintenance issues as any blockage of the culvert could undermine its effectiveness. Furthermore, they undermine the ethos of ‘making space for water’, and utilising watercourses as an opportunity, rather than constraint, on creating attractive developments through redevelopment.

### Relevant objectives

- Objective 6 – A Sustainable Place

## 3.8 Transport

### Introduction

**3.8.1** When compared to other areas of the borough, Blackhorse Lane has strong public transport links. This is a major asset that can help support a sustainable pattern of growth that is not car dependent.

**3.8.2** Oxford Circus is only 20 minutes away on the Victoria line, and overground rail links the area to Barking and Gospel Oak. Bus routes 123, 158 and 230 means the regeneration areas of Tottenham Hale, Walthamstow, and Stratford are also within easy reach.

**3.8.3** Despite these assets, the current layout of pedestrian crossings at the Standard Junction compromises the ability of Blackhorse Road Station to effectively serve the local area. Road traffic issues also exist, and throughout the AAP area, the pedestrian and cyclist environment is largely poor. Transport for London are currently investing in the capacity of the Victoria Line, and exploring options for the bus network. However, a number of other measures will also be needed to mitigate for the impact of future developments on the transport network.

### Policy BHL12: Transport

A) Major new developments will be required to:

i) incorporate a network of streets designed for all users, that prioritises pedestrians, cyclists, and public transport users, following the guidance in the Urban Design Framework;

ii) incorporate appropriate traffic calming measures within the street network to encourage pedestrian and cycle permeability and discourage rat-running by vehicles;

iii) consider access to shops and services and public transport accessibility to inform the density of new developments;

iv) take opportunities to enhance pedestrian and cycle access to the Lee Valley Regional Park and Walthamstow Wetlands including the proposed extension to the National Cycle Network (NCN) Route 1 between Lockwood Way and Coppermill Lane;

v) accord with the maximum car parking and minimum cycle parking standards set out in Appendix 4 of the Development Management Policies DPD;

vi) make a financial contribution towards proposed improvements to pedestrian crossings at the Standard Junction and/ or other sustainable transport projects in the area;

vii) provide and comply with a Travel Plan in order to minimise private car use and harmful emissions, whilst also meeting the operational and servicing needs of the development;

viii) secure adequate provision for buses and taxis to meet the needs of the proposed development, which may include financial contributions.

B) On sites within easy walking distance of Blackhorse Road Station, car free developments will be encouraged.

C) The Council will support in principle other sustainable transport measures that encourage a modal shift including; the removal of unnecessary street clutter, new secure cycle parking at public transport hubs, road narrowing and pavement widening, Home Zones and DIY streets, Advance Stop Lanes, Greenways and the introduction of bus priority measures.

D) The Council will work in partnership with the Greater London Authority , Transport for London, London Legacy Development Corporation , and the Lee Valley Regional Park Authority to explore opportunities for improved sustainable transport up the east side of the Lee Valley, drawing together a string of development clusters and enhanced leisure activities.

## Justification and explanation

**3.8.4** Part of the justification for directing growth towards the Blackhorse Lane area is its comparative advantage to other parts of the borough in terms of public transport accessibility and easy accessibility to opportunities and services nearby at Walthamstow town centre. The availability of the tube, Overground trains, and local buses means that if planned properly, a sustainable pattern of growth, that is not overly reliant on the private car, can be achieved.

**3.8.5** However, at present the area is largely car orientated, which discourages sustainable travel choices. New developments offer a major opportunity to incorporate a new high quality public realm that includes streets for everyone. The Urban Design Framework includes detailed guidance on a network of streets that includes a street hierarchy, street widths, and hard and soft landscaping requirements. Following this guidance will help ensure places are created rather than roads; enhancing the social function of the streets as a public space and encouraging walking and cycling. Alongside a new neighbourhood centre, this will be important in encouraging walking for short trips, and meeting the Mayor's target for an increased mode share for cycling. 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 traffic, and has been shortlisted for the Mayor's Outer London Transformation 'Mini Holland' Funding.

**3.8.6** Encouraging walking and cycling can have health benefits to our resident's, whilst both in terms of increased uptake in physical activity, and stemming the growth in polluting car trips. There are also benefits in terms of improved road safety. This will be particularly important given plans for a new school in the area (see Site BHL2 South in Section 4: Opportunity Sites). The negative effects of growth in car use on the environment are well documented.

**3.8.7** Promoting sustainable transport is consistent with national, regional and local policy and guidance, namely:

- Creating Growth, Cutting Carbon: Making Sustainable Local Transport Happen (Department for Transport, 2011);
- Manual for Streets 2 (Department for Transport, 2010)
- The Mayor's Transport Strategy (GLA, 2010);
- Waltham Forest 2nd Local Implementation Plan 2011-2014 (Waltham Forest, 2011).

**3.8.8** Increased permeability will be a key theme of providing a network of streets that encourages walking and cycling. However, given that the main road network already suffers from some congestion, such as at the Standard Junction, there is a danger that new streets are misused by private vehicles passing through the area as an opportunity to avoid traffic hot-spots. Such treatment would undermine the good intentions of creating an attractive public realm that is inviting to pedestrians and cyclists. Rat-running should therefore be actively discouraged through traffic calming measures such as 20mph speed limits, and psychological barriers such as landscaping, narrow road widths, raised pedestrian crossings and some on street parking. Traditional traffic calming measures such as bollards and gates which allow pedestrian and cyclist access but restrict vehicular movement may be necessary in appropriate cases. However, a cluttered street environment should be avoided.

**3.8.9** PTAL is a transport planning methodology, which assesses the geographical access level of areas to public transport. The London Plan includes a density matrix which can be used to inform a sustainable pattern of living that focuses higher density developments to areas best served by public transport. In terms of the Blackhorse Lane area, this logically means that highest density developments should be located on sites such as the Station Hub. The availability of public transport here, along with the proposed new neighbourhood centre, means that residents of such developments are less likely to be car dependent. Whilst PTAL provides a useful indicator of acceptable densities, site specific matters such as the need for high quality designs, application of appropriate space standards etc will also influence what is acceptable. In addition, it is worth noting PTAL standards are based on current land use patterns. Regeneration efforts could improve the general accessibility of the area or reduce the need to travel by car, by securing improved connectivity to the station, and the provision of new shops and essential social infrastructure such as GP surgeries and schools.

**3.8.10** Walthamstow Wetlands and Lee Valley Regional Park offers an often undervalued tranquil environment away from nearby busy roads. Improved public access will not only bring benefits in recreational terms, but also provide a more inviting environment for movements to and from the Olympic Park, and employment opportunities in neighbouring boroughs, and Central London for pedestrians and cyclists. Policy BHL10 and figure 15 sets out where access into the park will be improved, whilst a new fully DDA compliant cycle path is proposed through the site from Lockwood Way to Coppermill Lane, as shown in figure 15. This will link with the Lea Valley Path and Queen Elizabeth Olympic Park in the Lower Lee Valley. In addition, money from the Outer London Fund has been secured for the provision of new cycle parking at Lockwood Way and Forest Road entrances.

**3.8.11** In the interests of a sustainable pattern of development, walking, cycling and public transport should all be prioritised over the private car. Parking standards set out in our Development Management Policies DPD apply. These aim to strike a



balance between prioritising alternative modes of transport, and meeting the functional needs of development. Generally speaking, these standards should be applied as a maximum.

**3.8.12** Achieving modal shift is not just about making it difficult to use the car though. It is also about enhancing and promoting opportunities for alternative modes. In terms of cycling, alongside an improved public realm, generous provision of secure cycle parking should be sought. Again, standards set out in our Development Management Policies DPD apply; although these should be treated as a minimum rather than a maximum. Additional guidance forthcoming in the planned Sustainable Transport SPD will also apply once adopted.

**3.8.13** The current layout of the Standard Junction prioritises vehicular traffic at the expense of the pedestrian and cyclist. ‘Sheep pen’ staggered crossings, whilst intended to enhance safety, means the capacity for pedestrian crossings is low, causing problems at peak hours when there are significant movements to and from Blackhorse Road Station. It also makes crossing by wheelchairs, pushchairs and the visually impaired difficult to achieve in one movement. Projected growth in the area will exacerbate these existing problems, and infrastructure improvements are therefore necessary.

**3.8.14** As set out in our preferred options paper, improvements to the existing highway network (namely a new by-pass through the Station Hub site from Forest Road to Blackhorse Road) has been considered and dismissed. The feasibility study conducted by JMP in 2011 (Blackhorse Lane Traffic Management Scheme) found such proposals to be unviable due to costs involved, loss of developable land, and a requirement to purchase and demolish residential properties in private ownership to achieve adequate visibility splays.

**3.8.15** Furthermore, if such proposals were viable, they would do little to enhance the pedestrian and cycle environment, and the major beneficiaries of the scheme would be commuters by-passing the area who do not strengthen or contribute to the local economy.

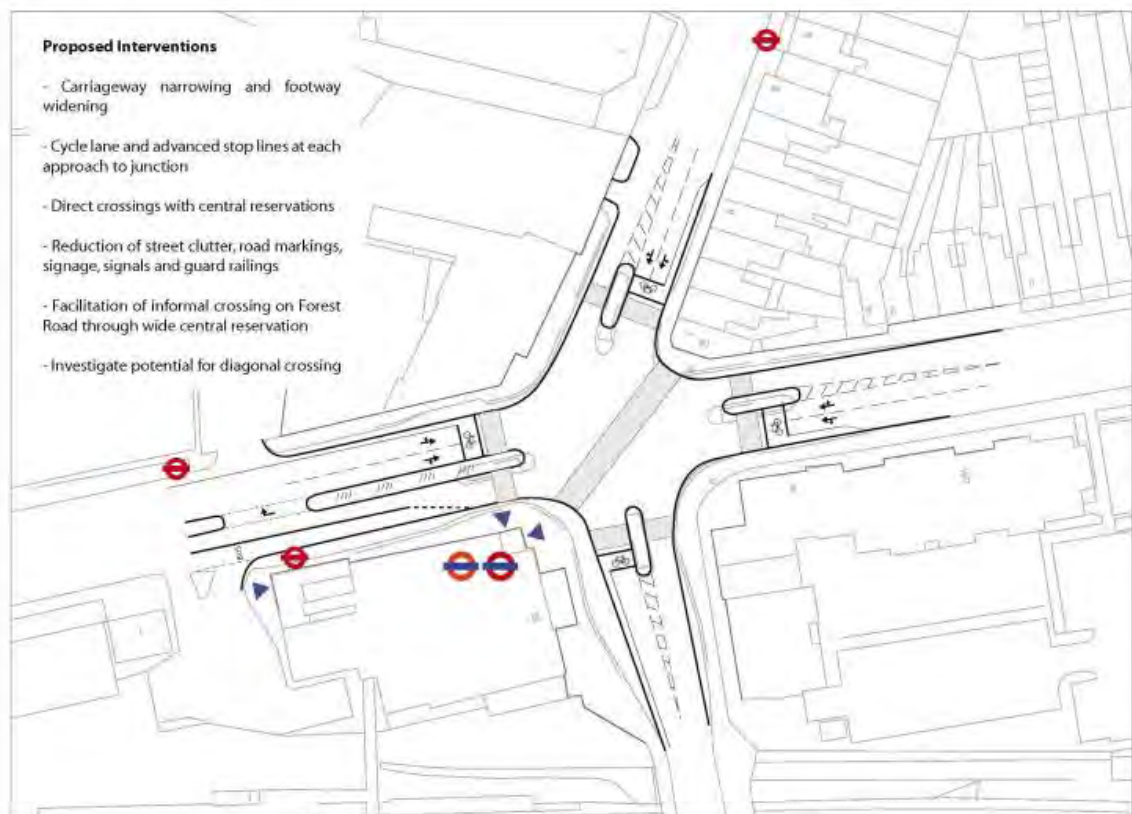
**3.8.16** Whilst detailed interventions are yet to be fully worked up, broad solutions that prioritise pedestrians and cyclists are set out in the Urban Design Framework and figure 19 below. This package of measures includes footway widening, advanced stop lanes for cyclists, reduction in street clutter, direct crossing points for those with wheelchairs and pushchairs, and central reservations offering opportunities for informal crossings at Forest Road for other pedestrians. It is anticipated that such measures could rebalance priority between different users of the junction, without causing major additional delays to road users (as signal alterations could). The benefits of these proposals are wide reaching for existing and future residents of the Blackhorse Lane area. They include improved:

- links from the north of Forest Road to Blackhorse Road Station;

## Blackhorse Lane AAP Incorporating Modifications

- east-west links into Lee Valley Regional Park and Walthamstow Wetlands;
- access to the new neighbourhood centre and linear park into Walthamstow Wetlands for residents in the south of the Blackhorse Lane area.

**3.8.17** Detailed feasibility works to inform final designs of the new Standard Junction, following the principles set out above, are now underway.



**Figure 19 Standard Junction improvements**

**3.8.18** As all new developments are likely to increase movements across the Standard Junction, financial contributions towards the interventions proposed in the Urban Design Framework will meet the tests set out in CIL regulations. At this stage it is anticipated that these interventions could cost in the region of £1m. The Council will therefore explore opportunities to supplement developer contributions towards this infrastructure project with external funding.

**3.8.19** Over the lifetime of the plan, additional sustainable transport projects may come forward to further support sustainable development in the area. Where this is the case, developer contributions may also be necessary.

**3.8.20** All major development proposals must be accompanied by a Travel Plan, which sets out a full package of actions to encourage safe, healthy and sustainable travel options. Measures will vary depending on site specific circumstances, but in all cases a 'carrot and stick' approach is needed. This means that sustainable transport modes should be incentivised alongside the discouragement of private car use. Focus should not therefore simply be on matters such as Controlled Parking Zones, but also securing improvements to the public transport network, pedestrian and cyclist environment. Furthermore, where provision for motor vehicles is made, charging stations for electric vehicles can facilitate a move towards less polluting vehicles, whilst car clubs can encourage people to drive less by reducing the need for car ownership. Further advice is provided in the Transport for London document: 'Travel Planning for new development in London'. Whilst significant and co-ordinated effort is needed to minimise growth in private car use, such efforts must be balanced against the operational needs of the development. In some circumstances, such as for commercial developments, provision for servicing and waiting areas for taxis may be necessary. Proposals should therefore meet the requirements of policy DM16C of our Development Management Policies. Furthermore, vehicular access to sites off of Forest Road and Blackhorse Lane should be provided from local roads, so that they do not disrupt the Strategic Road Network.

**3.8.21** Much of the quantum of development proposed in the Blackhorse Lane area is to be directed towards sites close to Blackhorse Road Station. Improved pedestrian access to the station, alongside better provision for cyclists (both in terms of new/ improved routes, and generous cycle parking provision), and the provision of car clubs, will minimise the need for car ownership amongst residents moving into the area. This will be particularly true in areas within reasonable walking distance of the station such as sites BHL1, BHL2 and BHL8. Subject to appropriate Travel Plans and developer contributions, car free developments will therefore be encouraged in such locations. Meanwhile, the Council will work with partners to secure additional cycle parking at Blackhorse Road Station.

**3.8.22** A corridor scheme has been implemented in Higham Hill Road to improve road safety through a range of public realm works, including carriageway narrowing and pavement widening, removal of street clutter, and bus stop enhancements. Over the lifetime of the plan, funding may be secured for similar interventions in and around the plan area.

**3.8.23** Redevelopment of the Transport for London car park as a car-free or low-car development as part of plans for the Station Hub (see site BHL1), will also bring benefits in reducing car trip generation to the site. Such proposals will help reduce unnecessary road trips from commuters using the car park in conjunction with the Station as a park and ride facility to central London. The potential impacts of displaced commuter parking on neighbouring streets and local amenity needs to be carefully managed; something that enforcement of existing Controlled Parking Zones should help achieve.

**3.8.24** It is important that developments in Blackhorse Lane are not viewed in isolation, but instead as part of a wider corridor of development activity along the Lee Valley. As set out in the Growth Boroughs Prospectus (2012), opportunities may exist for improved sustainable transport projects along the east side of the Lee Valley to link new residential and employment generating developments with enhanced leisure activities. Given the environmental designations covering the Lee Valley Regional Park, as proposals are worked up, options will need to be subject to Sustainability Appraisal and Habitats Regulation Assessment.

### Relevant objectives

- Objective 7 – A Connected Place

## 3.9 Climate Change and Decentralised Energy

### Introduction

**3.9.1** Climate change is one of the greatest challenges facing the world today. Its potential implications for the natural and built environment are widely acknowledged.

**3.9.2** In line with national and London Plan targets, we are committed to reducing carbon emissions in the borough by 60% by 2025, and 80% by 2050. The Mayor also expects 25% of the heat and power used in London to be generated through the use of localised decentralised energy systems by 2025.

**3.9.3** The strategic location of Blackhorse Lane within the Upper Lee Valley means that the area is well placed to secure new developments with strong green credentials; and make a positive contribution towards the achievement of our carbon reduction targets.



### Policy BHL13 Climate Change and Decentralised Energy

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 DM11 from our Development Management Policies DPD will be met;

- how the proposal will link in the short to medium term to the planned Blackhorse Lane Cluster, and ultimately the Upper Lee Valley Decentralised Energy Network, unless this can be demonstrated to be unfeasible or unviable. Where schemes come forward in advance of this 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 effect.

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.

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.

### Justification and explanation

**3.9.4** Measures set out elsewhere in this AAP, such as providing new open spaces as part of developments, and co-ordinating land uses to minimise road travel, can play a positive role in tackling climate change.

**3.9.5** The area's setting within the Upper Lee Valley provides excellent opportunities for new developments to have strong sustainability credentials. Existing employment areas offer scope for a growth in green industries, whilst use of green roofs, landscaping, tree planting and SUDs in new developments can help signal a better relationship with the adjacent Lee Valley Regional Park. The creation of new green

corridors can also support walking and cycling; which alongside the comparatively good level of provision of public transport, and a planned new neighbourhood centre, means new developments can provide exemplars of sustainable living.

**3.9.6** Designing new buildings so they use less energy, supply energy efficiently, and use renewable energy will also be important. The standards that we will apply to new development proposals are already established in Policy DM10 of our Development Management Policies, and will apply to sites in Blackhorse Lane as they would the rest of the borough.

**3.9.7** Decentralised energy works by combining heat and electricity generation processes and distributing heat to buildings via district heating pipes. Such networks can secure substantial carbon dioxide emission savings, since they run at a greater efficiency than centralised power stations. This can make it cheaper for developers to meet carbon reduction targets and environmental standards such as Code for Sustainable Homes and BREEAM. They also offer benefits to future occupants of developments in terms of increased storage space and reduced maintenance costs by removing the requirement for individual boilers.

**3.9.8** The Upper Lee Valley combines strategic energy assets which could make a Decentralised Energy Network commercially viable in the area. These assets include energy from waste opportunities, significant regeneration activities, and a vibrant industrial corridor that hosts several significant users of energy.

**3.9.9** As part of the Upper Lee Valley Opportunity Area, there is therefore a long term vision for a Decentralised Energy Network. Pre-feasibility work undertaken by Parsons Brinckerhoff (2011) at a sub-regional level indicates that to deliver such a network, in the short to medium term there will be a need for small 'satellite schemes' whereby developments in close proximity to one another can be served by a single energy centre. This will ensure necessary infrastructure is delivered across different development phases; which could then be linked together at a later date; potentially south to the Northern Olympic Fringe and the Olympic Park.

**3.9.10** Feasibility work carried out by Parsons Brinckerhoff (2012) identified Blackhorse Lane as an area offering potential for a satellite scheme. Whilst this did not confirm exact locations for such a scheme, it highlighted key considerations as:

- proximity to the proposed network route
- visual impact and neighbour amenity
- access for maintenance.

**3.9.11** Building on the Parsons Brinckerhoff Study, further analysis of the opportunity in the area is underway, which has highlighted the Station Hub and 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.

**3.9.12** 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 200-300m<sup>2</sup> in size. Furthermore, it may be possible for such centres to be located within the basements of developments (subject to access and flue arrangements); which would minimise loss of developable area.

**3.9.13** Where Decentralised Energy is proposed, infrastructure should be designed in line with district heating best practice. The Greater London Authority has developed a 'Decentralised Energy Manual', which new developments should comply with, both in terms of principles and standards.

### Relevant objectives

- Objective 6 - A Sustainable Place

## 3.10 Social Infrastructure

### Introduction

**3.10.1** Social infrastructure covers a wide range of services and facilities that can help contribute to the creation of a sustainable community. It includes:

- education facilities;
- health services;
- facilities for the emergency services;
- sports and leisure facilities including swimming pools, sports halls and outdoor sports spaces;
- libraries;
- jobs brokerage centres;
- community space and faith facilities;
- meeting rooms and halls;
- public houses;
- courts.

**3.10.2** Green infrastructure such as public open spaces and children's play space are also an important aspect of sustainable communities, but are addressed separately in the section on public open space and nature conservation.

**3.10.3** Since being identified as a regeneration area in 2006, there has been some success in terms of provision of new social infrastructure. Walthamstow Academy has been built, Essex Hall has been redeveloped for healthcare purposes, new open space is being provided as part of residential developments at Sutherland Road, and sites have been made available for temporary community and faith use within underused employment sites.

**3.10.4** The level of growth anticipated for the area means more social infrastructure will be needed. Providing this in today's climate of public spending cuts will be a major challenge. As set out in our Preferred Options document and supported by its accompanying Sustainability Appraisal, education and health facilities are therefore being prioritised in the area alongside green infrastructure.

### **Policy BHL14: Social Infrastructure**

To secure a sustainable pattern of development:

A) sites BHL2 South and BHL3 (see Section 4: Opportunity Sites) will be protected for education use in the medium to long term to meet increased demand as population in the area grows;

B) we will work with health providers and developers to secure the provision of a new GP and dental practice within site BHL1, BHL4 or BHL6 (see Section 4: Opportunity Sites);

C) The Tryst Public House and Standard Music Venue will be retained or re-provided as part of the redevelopment of site BHL1 (see Section 4: Opportunity Sites), as an important social facility;

D) a new community meeting space will be provided as part of the development of site BHL7 (see Section 4: Opportunity Sites)

E) additional community uses and social infrastructure will be supported as part of mixed use developments on opportunity sites, where there are no overriding concerns in terms of neighbour amenity;

F) developer contributions will be sought to support the provision of new, or expansion and maintenance of existing social infrastructure;

G) the net loss of key social infrastructure in new developments will be resisted.



## Justification and explanation

**3.10.5** Our Social Infrastructure and Needs Assessment (URS, 2009) identified a range of infrastructure that needs investment in the borough, including open spaces, indoor leisure facilities, community halls, libraries, education and health. However, in the current climate of public spending cuts there is a need for a rationalisation of services to areas with a wide catchment. Within the definition of social infrastructure, as set out in our Preferred Options document, it is considered that education and health facilities are those that offer the greatest value to new and existing residents in the area. Other forms of social infrastructure such as libraries and leisure centres do provide obvious benefits, but in the interests of prioritisation it is considered that residents can be reasonably expected to travel further for such infrastructure; e.g. to Walthamstow town centre. The importance of green infrastructure to the successful regeneration of the area is discussed in detail in the section on public open space and nature conservation.

**3.10.6** New high quality education facilities will be important in supporting the raising of educational standards and attracting 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 621 primary school places and 443 secondary school places. Site BHL3 is therefore also earmarked for education use. Prior to the development of a new school at Site BHL2 South, temporary uses such as storage may be acceptable.

**3.10.7** The findings of the Social Infrastructure Needs Assessment included an identified need for a new doctors and dentists surgery in the borough, based on estimated levels of growth. As set out in the infrastructure delivery plan of the adopted Core Strategy, a total of 4 additional GP practices and 4 dental practices are required over the plan period, to be focussed in our key growth areas. As one of the key growth areas, it is therefore logical that 1 GP practice and 1 dental surgery are provided. Through discussion with landowners, opportunities have been identified on sites BHL4 and BHL6 that are being further explored. Alternatively, such uses are appropriate to the scale and function of the new neighbourhood centre proposed at Site BHL1.

**3.10.8** 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. Development proposals will therefore be required to secure the provision of a public house capable of hosting live music, in order to help provide opportunities for social interaction and foster a sense of community.

**3.10.9** Through negotiation with landowners, a new community meeting space is to be provided as part of the development of site BHL7: Billet Works. A requirement for the provision of this has been conditioned to the recent planning permission.

**3.10.10** Since all forms of social infrastructure do provide benefits in terms of a mixed and inclusive community, where further opportunities arise such uses will normally be supported. This will however be subject to careful consideration of any conflicts of interest with neighbouring occupiers. Furthermore, where proposals are likely result in increased demand for social infrastructure that has not been mitigated on site, developer contributions will be sought.

### **Relevant objectives**

- Objective 8 – A Community Place

# Opportunity Sites

## 4 Opportunity Sites

### 4.1 Introduction

#### Introduction

**4.1.1** A range of opportunity sites have come forward through previous consultation. The sources of these are varied. They include the:

- Interim Planning Policy Framework developed in September 2006;
- Borough wide 'Call for Sites' in the summer of 2009;
- Area Action Plan Issues Paper and Preferred Options Paper;
- Ongoing discussions with landowners.

**4.1.2** This section sets out our aspirations for these sites, based on what we think is an appropriate and viable use of land that can secure regeneration benefits for the wider area. Proposals have been subject to liaison with relevant landowners. The realisation of our aspirations for these sites will help contribute to the achievement of the vision and objectives set out at the beginning of this AAP. They provide an appropriate balance of uses to achieve an integrated and attractive urban environment, and are broadly consistent with the growth targets for the area as set out in the adopted Core Strategy.

**4.1.3** Where figures are provided of commercial floorspace or number of residential units, these provide a broad indication of what we think the capacity of the site may be, based on matters such as PTAL ratings, pre-application discussions, and the context of the surrounding area.

**4.1.4** However, as the AAP covers development in the area up to the year 2026, it is acknowledged that the economic market and other external forces may change the potential developments over time. A degree of flexibility in terms of uses and densities may therefore be necessary; especially if current market conditions persist. For this reason, site specific guidance contained here is intentionally not overly prescriptive.

**4.1.5** Any proposals that depart considerably from the guidance in this section will need to be supported by strong evidence of the benefits they bring and how they comply with the vision, objectives, and broad principles of this AAP and the remainder of the Waltham Forest Local Plan. As the Council has assessed the viability implications of its policies on development in the borough, proposals that depart from policy will also need to be supported by viability evidence to justify schemes that are not strictly policy compliant.



**4.1.6** Figure 20 shows where within the AAP each opportunity site is located. At the end of the site specific guidance, we have prepared some target figures for breakdown of uses and a timeframe for implementation of these developments. However, it must be stressed that this is indicative only and will inevitably be subject to change as it is dependant on the actions of a number of partners, and uncertainties such as the future economic climate.

**4.1.7** Over the plan period it is also possible that sites yet to be identified come forward for redevelopment. Where this is the case, proposals will be judged in terms of their contribution towards the vision and objective of this AAP, compliance with the key policy areas (section 3), and any other relevant policies from the Waltham Forest Local Plan.

**4.1.8** Where we do not believe sites that were put forward in the 2009 'Call for Sites' can realistically be developed, a brief commentary of our justification for discounting them is provided. Their location is also shown in figure 32.

**4.1.9** In determining development proposals for these opportunity sites, policies contained both in this AAP, and in other parts of the local plan, will be important considerations. For example, whilst no specific reference to water infrastructure has been made in the AAP, Policy DM34: Water, from the Development Management Policies, will be an important consideration in terms of ensuring the development of opportunity sites are supported by adequate water infrastructure.

**4.1.10** It should also be noted that due to the industrial past of the area, several development opportunities may give rise to issues of land contamination. Planning obligations to investigate and undertake remedial measures in accordance with Development Management Policies will therefore be necessary.

**4.1.11** All opportunity sites also fall within Source Protection Zones designated by the Environment Agency. Sites BHL1, BHL2 North and BHL2 South fall in the inner zone, whilst the remainder fall in the outer zone. These designations mean that care will be needed to ensure development activities do not adversely affect sources of high quality water usable for human consumption. Development Management Policy DM24: 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.

# Blackhorse Lane AAP Incorporating Modifications

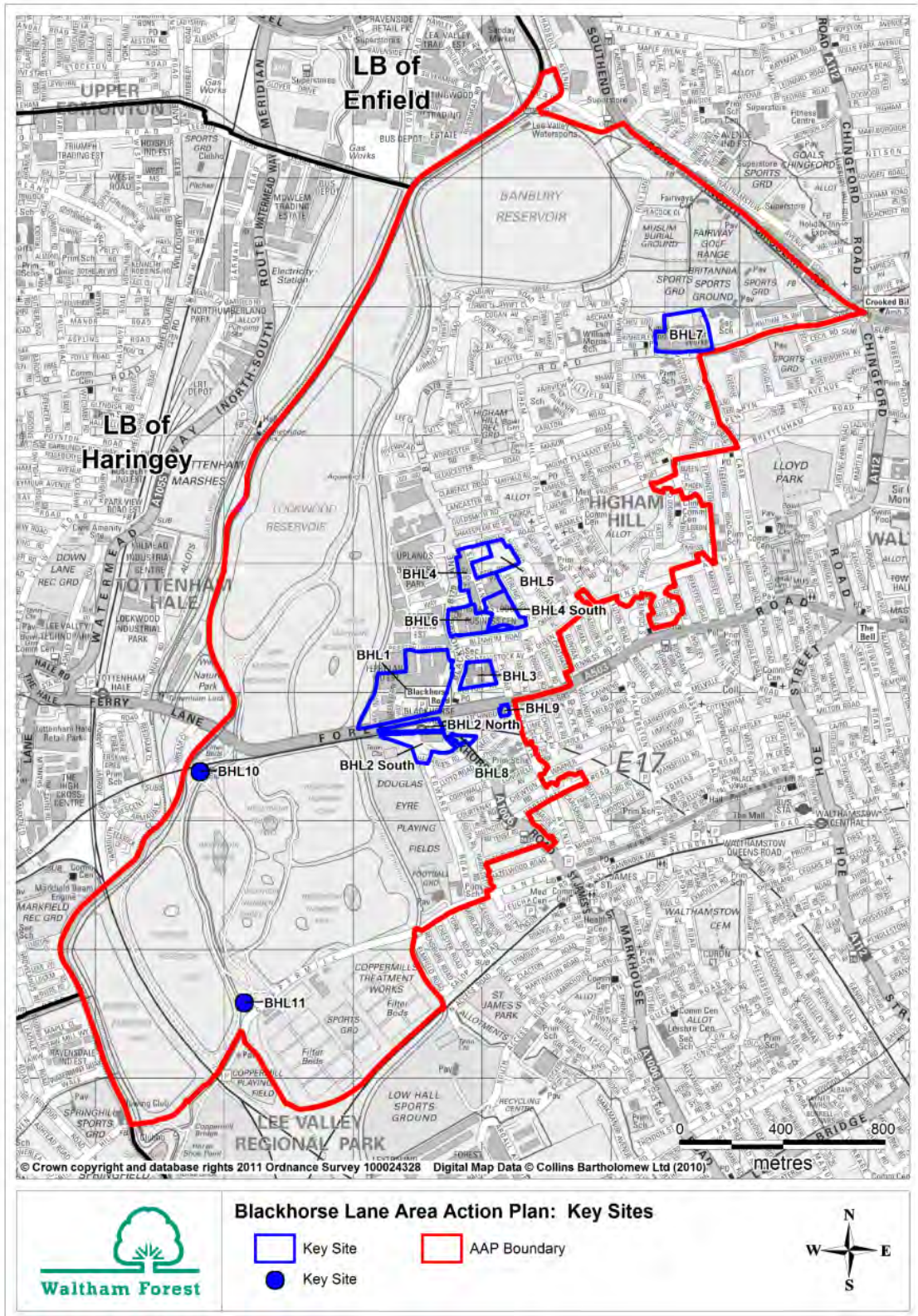


Figure 20 Opportunity Sites

## 4.2 Site BHL1 - Station Hub and Waterfront

<b>Site reference</b>	BHL1
<b>Site name</b>	Station Hub and Waterfront
<b>Site area (ha)</b>	6.8
<b>Current use</b>	Predominantly general industrial and warehousing uses. Also includes a vacant public house and music venue, surface level car parking, and some B1 business space.
<b>Planning history</b>	<p>2013 - Approval of redevelopment of part of site to provide 484 residential dwellings, 519 rooms of student accommodation, 1080m<sup>2</sup> of retail space, 305m<sup>2</sup> of B1 space, refurbishment and extension of 7 Blackhorse Lane to provide flexible A3/B1/D1 floorspace and provision of a linear park.</p> <p>2014 - Outline approval for demolition of existing and mixed use redevelopment comprising 311 residential units, up to 2210m<sup>2</sup> commercial/ community floorspace (A1/A3/B1/D1 class uses) creation of two vehicular access, new internal roads, car parking, open space/ landscaping and highways works.</p>
<b>Context</b>	<p>A large, relatively low density site located at the junction of Forest Road and Blackhorse Lane. Industrial buildings dominate, which are predominantly 2-3 storey warehouses. A large area of surface level car parking is also provided at the Forest Road frontage of the site.</p> <p>As set out in section 3.5: Design and Local Character, there are some buildings of merit along the Blackhorse Lane frontage of the site; namely the Kings Family Network building (art deco building), the former Tryst Public House and Standard Music Venue, and the frontage to Gnome House. Some mature trees exist on the southern, western, and eastern boundaries of the site.</p> <p>Surrounded uses to the site are mixed. To the south of the site is Blackhorse Road Station, which is adjacent another opportunity site (BHL2 North). To the east is two storey Victorian terrace housing, and a small retail parade, to the north is predominantly industrial uses, and to the west is Walthamstow reservoirs and the Lee Valley Regional Park. A series of cottages exist immediately north of the Kings Family Network building.</p>



	In addition to Blackhorse Road Station, the site also benefits from bus links to Walthamstow town centre, Tottenham Hale and Wood Green.
<b>PTAL</b>	3-5
<b>Proposed land use</b>	<p>Mixed use, incorporating approximately 1140 new homes and approximately 6780m<sup>2</sup> of commercial space (including retail, B1 business space, and social infrastructure), a new linear park, public open spaces, and 519 rooms of student accommodation.</p> <p>New A1-A4 and D1-D2 uses should be focussed within the neighbourhood centre frontage designated in figure 6, with no single retail unit having a net floor area larger than 1000m<sup>2</sup> to accord with Policy BHL6: Neighbourhood Centre and Local Retail Parades. Further detail of how uses should be co-ordinated is set out in the Urban Design Framework.</p>
<b>Issues/ Opportunities</b>	<p><b>Intensification</b></p> <p>The existing pattern of development has resulted in an inefficient use of land at this major transport hub. A combination of large industrial buildings and surface level car parking results in an unattractive and impermeable built form at this prominent site. Potential exists for high quality, higher density development with active frontages that better address public realm; in particular the frontages of Forest Road and Blackhorse Lane. Opportunities also exist to enhance views the striking views across Walthamstow Wetlands.</p> <p><b>Neighbourhood centre</b></p> <p>There is currently a lack of quality shops and services in the Blackhorse Lane area to meet the needs of local residents and businesses. 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 as shared public space), and social infrastructure, to compliment existing retail units in the vicinity. Consolidating these uses along the the Blackhorse Lane frontage not only helps compliment existing retail, but also maximises their accessibility</p>



to the major areas of population growth, north of Forest Road. Such units could benefit also benefit from movements from visitors entering Walthamstow Wetlands through the new linear park.

### **Employment**

5 Blackhorse Lane is home to a number of valuable businesses providing local jobs. However, the ground floor frontage has been earmarked for development of new retail uses for the reasons set out above. Any new development proposals will therefore need to secure the relocation of existing employers locally to ensure our objective that Blackhorse Lane is a place to do business and for creative businesses is not compromised. Similarly, relocation of other existing businesses within the borough, such as those at Ferry Lane Industrial Estate, will be sought.

### **Housing**

Given the sustainable location of the site, scope exists for the introduction of a significant amount of residential development. This is envisaged to be a largely flatted development, geared more towards smaller units rather than large family housing (but with some provision of larger units). As public transport provision is comparatively good, and the Lee Valley Regional Park provides an attractive setting, high quality developments that attract the upwardly mobile to the area are envisaged. The mass of people and disposable income this would generate in the area can also help support the provision of high quality shops and services in the neighbourhood centre. The size and locational benefits of the site means there is scope for some purpose built student accommodation. As a substantial amount has now been approved on part of the site, additional provision is unlikely to be supported under the terms of Policy BHL2.

### **Heritage and building heights**

Any new development needs to be harmonised with the heritage of the area. A number of buildings are identified as being of some merit; namely The Tryst Public House and Royal Standard Music Venue, and the Kings Network Building. The locations of these are shown on the plan below. In addition, immediately outside the site area are some attractive cottages (along Blackhorse Lane). Proposals for taller buildings should be designed to avoid

over-dominating these assets with particular care taken to harmonise proposed development with the setting of these existing assets.

**Public realm and pedestrian/ cyclist environment**

The area is currently car dominated, with a poor public realm and environment for pedestrians and cyclists. Redevelopment can better address the relationship of the site with the Lee Valley Regional Park through the orientation of buildings and provision of a new linear park and bridge as detailed in figure 16. Internal courtyards, as set out in the Urban Design Framework, can also provide opportunities for social interaction within the neighbourhood centre. Developer contributions should be provided towards improvements to pedestrian crossings at the Standard Junction, and new pedestrian and cycle links within Lee Valley Regional Park. To create an attractive and welcoming environment around the linear park, there may be a need for some small scale commercial uses such as cafes outside of the neighbourhood centre as part of mixed use developments, in order to secure an active frontage and bring life to this communal space.

**Car parking**

As the site is close to Blackhorse Road station and a number of bus routes, car free development can be supported on the residential element of any scheme. Some concession may be necessary for disabled access, and the operational requirements of the commercial element of any scheme.

**Flood risk**

Flood risk is also a constraint to development, and making space for water will need careful consideration in development proposals. Flood risk is highest on the western edge of the site, as shown in figure 18. This has implications for the use of ground floor buildings along the western edge of the site; since highly vulnerable uses here should be avoided; yet any uses proposed should seek to achieve an active frontage, and respect the boundaries of the neighbourhood centre.

Despite known flood risk, the site is considered to pass the sequential test required by national policy, due to the number of key regeneration benefits redevelopment for the proposed uses will bring that could not be achieved on alternative sites. These overriding benefits are:

- It is the only site close to Blackhorse Road Station that offers scope for comprehensive redevelopment incorporating a new neighbourhood centre that includes indoor and outdoor spaces for social interaction. This is important in meeting the requirements of national planning policy on economic development and fostering a sense of community;
- Its prominent location at a key junction, opposite Blackhorse Road Station, and adjacent Walthamstow reservoirs, offers scope for a high quality flagship development that enhances the image of the area and exploits fantastic views of the reservoirs;
- No other site offers the same opportunities in terms of providing new physical and visual links into Walthamstow Wetlands for surrounding communities that currently suffer from a deficient access to open space;
- Alternative sites do not offer the same opportunities for the restoration of the Dagenham Brook and enhancement of the Flood Relief Channel.

Furthermore the Preferred Options Interim Sustainability Appraisal noted that the development of the site is key to the regeneration of the Blackhorse Lane area and the borough. Nevertheless, Site Specific Flood Risk Assessments will be required when individual planning applications come forward, in order to demonstrate that dry access to a place of safety can be achieved in the event of a flood, that development would not result in an increase in flood risk elsewhere, and where possible, flood risk overall will be reduced through the proposals. On the western edge of the site, a clear buffer should be provided from the Dagenham Brook and flood relief channel, in accordance with Policy BHL11: Flood Risk.

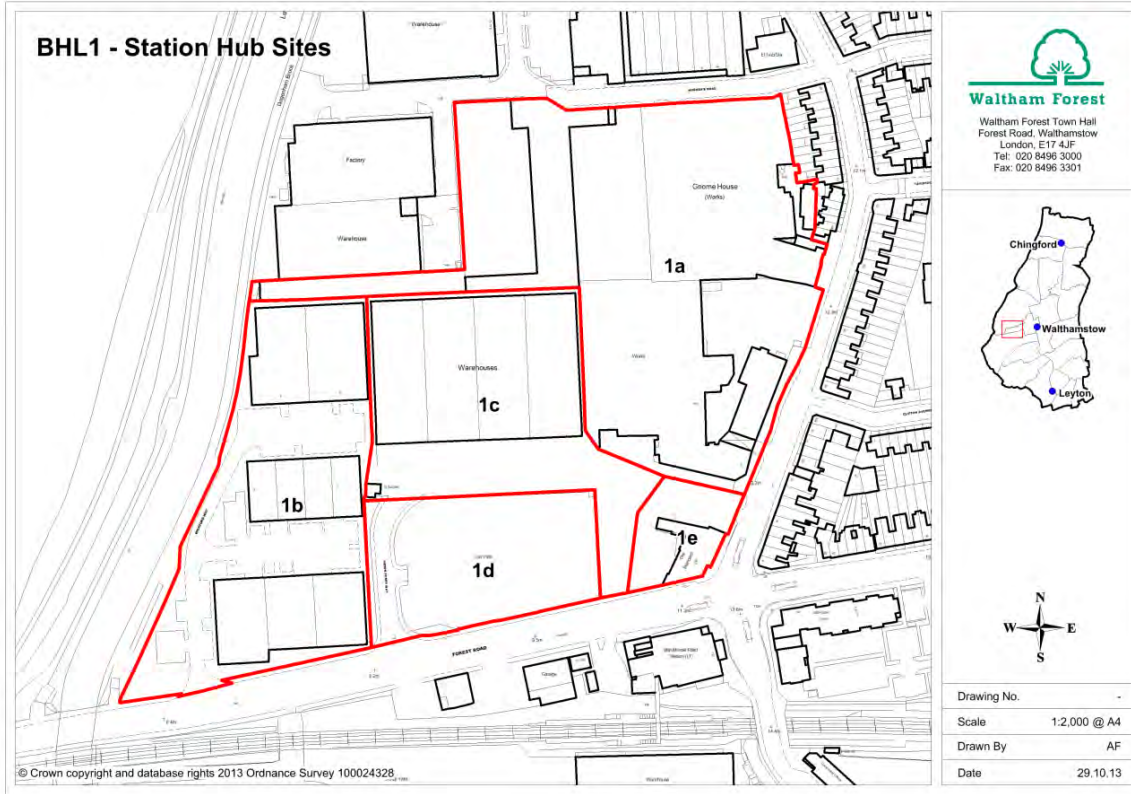
### **Decentralised Energy**

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><b>Walthamstow Wetlands</b></p> <p>Proposals should seek to enhance the relationship with Walthamstow Wetlands through the orientation of buildings, provision of new routes into Lee Valley Regional Park, and generous levels of landscaping, consideration of green roofs etc. Proposals should seek to exploit views throughout the site; not just for residents on the western edge immediately adjacent the open space. The need to provide a setback from the flood relief channel and Dagenham Brook offers an opportunity to provide a green edge to the development.</p> <p>Whilst adjacent areas of nature conservation value are an asset that developments should seek to better utilise, such interests also influence development opportunities. Any demolition and construction phases will need to minimise disturbance to wintering waterfowl populations. This will be negotiated at the planning application stage, but could include requirements such as using noise attenuation techniques, or avoiding works between September and March.</p> <p><b>Noise and air pollution</b></p> <p>As the Standard Junction experiences high levels of road traffic air quality is known to be poor. Noise and air quality assessments will therefore be needed as developments come forward, and depending on the findings, mitigation measures may be required. This could include use of commercial buildings such as business units rather than residential at street level.</p> <p><b>Land ownership</b></p> <p>One issue that has prevented the development of the site from coming forward in recent years despite our regeneration efforts is that the site is in multiple private land ownerships. A detailed masterplan for the site that allows it to come forward in compatible phases has therefore been prepared and included in the Urban Design Framework.</p> <p>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.</p>
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# Blackhorse Lane AAP Incorporating Modifications



### BHL1

Station hub and waterfront

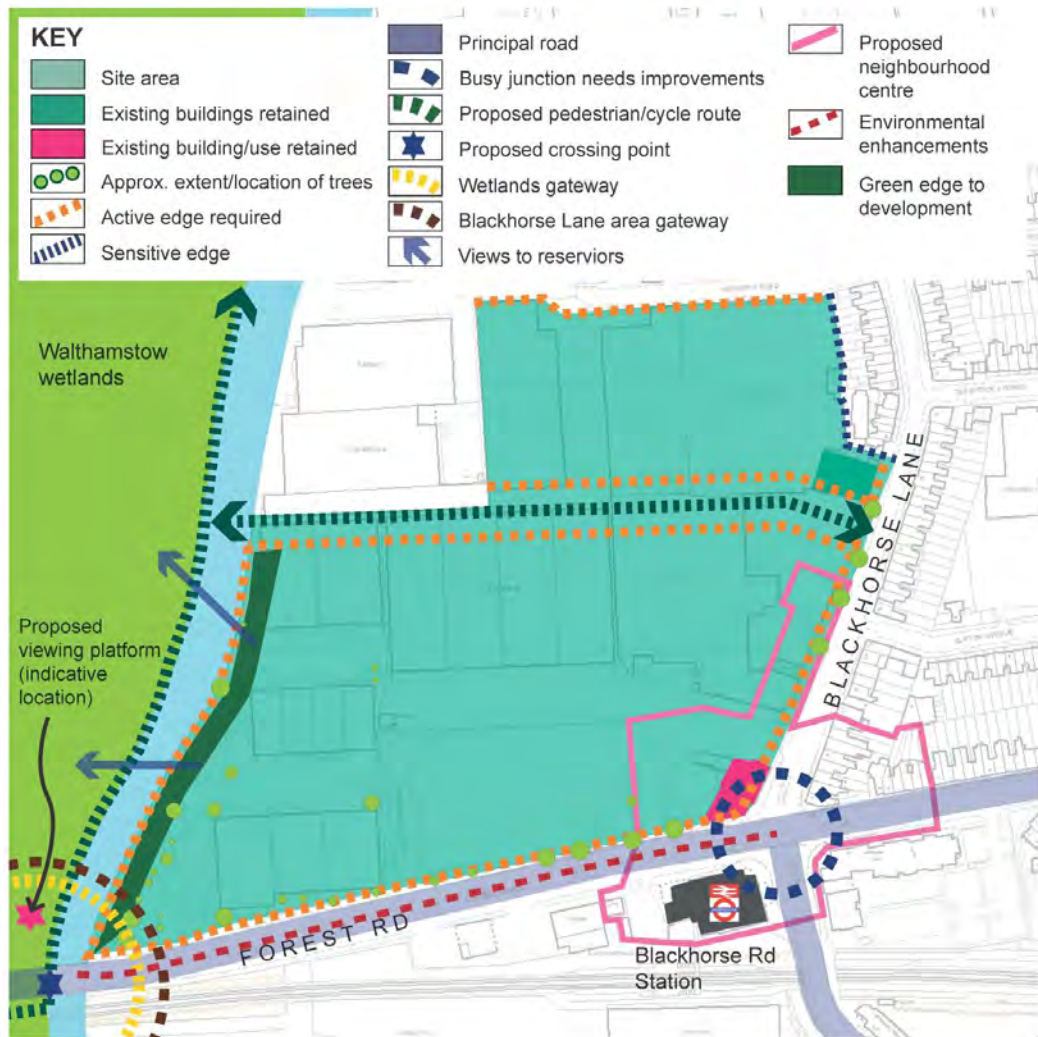


Figure 21 Site BHL1 design principles

## 4.3 Site BHL2 North - Car Wash & Garage Site

<b>Site reference</b>	BHL2 North
<b>Site name</b>	Car Wash Site
<b>Site area (ha)</b>	0.2
<b>Current use</b>	Hand car wash, Renault garage and café.
<b>Planning history</b>	2011 – Approval for retention of use of the café for a further 3 years.
<b>Context</b>	This site forms a rectangular wedge between the Barking to Gospel Oak railway line to the south and Forest Road to the north. It lies immediately adjacent to (but, does not include), Blackhorse Road Station. It is also close to one of the Walthamstow Wetlands gateways.
<b>PTAL</b>	4-5
<b>Proposed land use</b>	Mixed use with ground floor commercial units and/or social infrastructure (approximately 1500 m <sup>2</sup> ) 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.
<b>Issues/ Opportunities</b>	<p><b>Intensification</b></p> <p>This site is currently underutilised. It lies immediately adjacent to Blackhorse Road Station and is close to the proposed new neighbourhood centre. It is therefore in a prime location for a more intensive development maximising the benefits of its location. Any intensification would need to respect the operational requirements of the station though.</p> <p><b>Walthamstow Wetlands</b></p> <p>This site is adjacent to the Walthamstow Wetlands gateway and one of its access points. Development proposals should reflect the importance of this location. To enable a strong green signature to development, proposals could introduce living walls, green roofs, bird nesting boxes or plants that provide habitats and feeding stations for wildlife. Also, given the sites proximity to the</p>

	<p>wetlands, developers will need to minimise any potential disturbance to wintering waterfowl during the demolition and construction phases.</p> <p><b>High profile location</b></p> <p>Given that this site is in a high profile location, at one of the borough's gateways, design quality must be of an exemplary standard.</p> <p><b>Building heights</b></p> <p>As this site is in a prominent location at one of the borough's gateways, building heights of up to 6 storeys would normally be acceptable. However given the shallow nature of the site, and because it is adjacent to the 1-2 storey train station, building heights of 4-5 storeys are likely to be more appropriate.</p> <p><b>Nature of residential element of the development</b></p> <p>Given the sites close proximity to public transport, a higher density development (up to 700 habitable rooms per hectare) that is intended to attract young professionals wanting convenient access into central London would be appropriate. This is likely to see proposals that show a larger number of flatted units with the emphasis of amenity space provision, being quality rather than quantity. Given air quality and noise from the adjacent rail line and Forest Road, amenity space provision will be a challenge.</p> <p><b>Activity</b></p> <p>Development should seek to bring activity and natural surveillance to the Forest Road frontage. This will improve the quality and sense of safety of the public realm.</p> <p><b>Public realm/access</b></p> <p>Forest Road runs along the front edge of the site and is one of the borough's principal roads. Servicing is considered a challenge to development proposals and should ideally be provided off-street. Where on-street servicing is proposed, consideration must be given to the impact on traffic flows and where necessary mitigation measures proposed. A transport assessment will be required.</p>
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The design of Forest Road is focused on the needs of vehicles but does not provide a quality environment for pedestrians or cyclists. Proposals should consider public realm improvements near the site that celebrate this location as a gateway to the Walthamstow Wetlands and the Blackhorse Lane area. Contributions towards the Standard Junction improvements including opportunities for informal crossing along Forest Road, away from the junction, as set out in figure 19 will be required.

**Parking**

Given that the site is immediately adjacent to Blackhorse Road Station, a car free development in terms of the residential element of any scheme would be appropriate (with exception of parking provision for disabled units).

**Noise and air pollution**

The site lies between the Barking to Gospel Oak railway line and Forest Road. Noise and air quality assessments will therefore be needed, and depending on the findings, mitigation measures may be required. This could include requiring commercial uses such as business units at street level, rather than residential.

**Flood risk**

There is a risk of flooding along the boundary of Forest Road and therefore a Site Specific Flood Risk Assessment will be required.

**Contamination**

Previous use of the site as a petrol station, and potential previous use as a coal yard, means that land contamination may be an issue. Development proposals would need to be supported by investigative works and propose appropriate remedial measures.

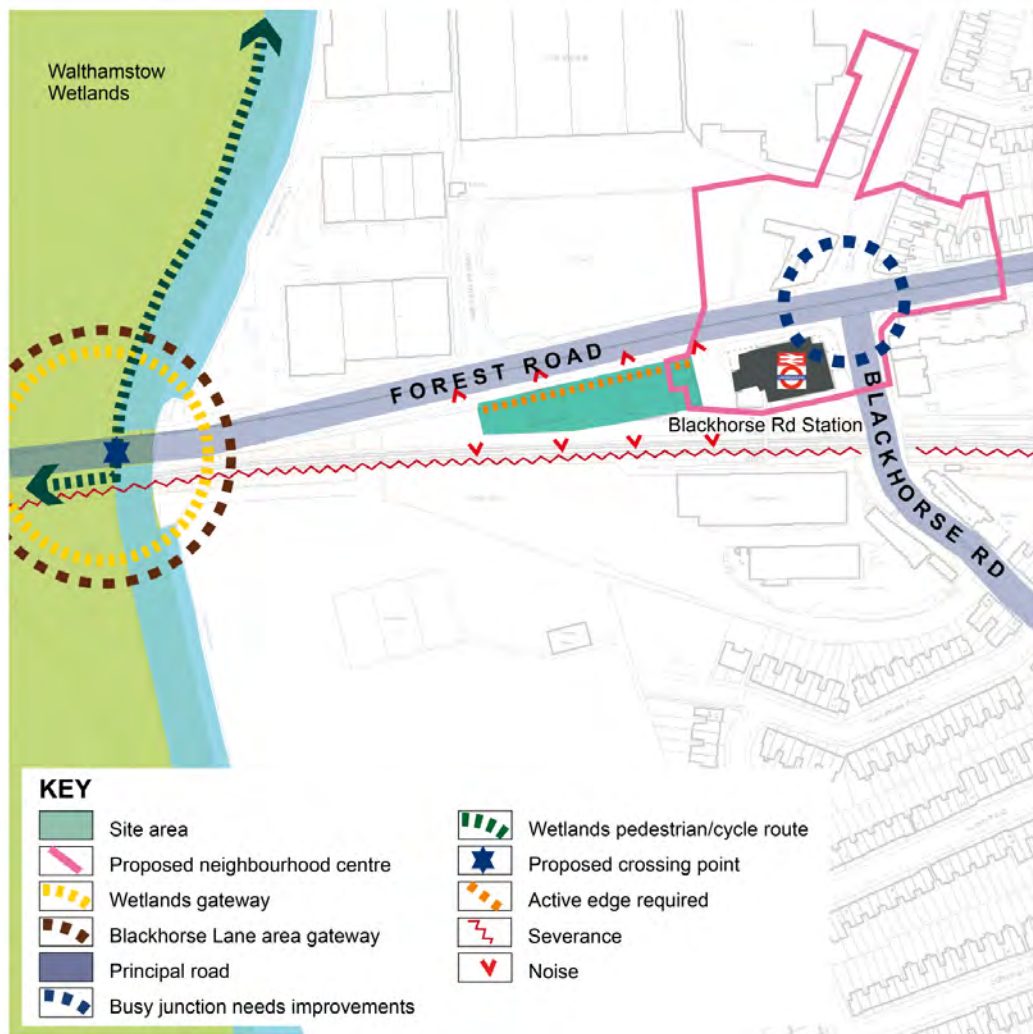
**Neighbourhood Centre**

Whilst most of the site is occupied by a Car Wash business and Renault garage, some small retail units also exist. A small proportion of the site is currently occupied by small retail units. Given the proximity to the train station, redevelopment should seek to continue to provide such uses; which can capitalise on passing trade from commuters.

**Archaeological Priority Zone (APZ)**

	<p>The site lies within the River Lea Valley APZ which is characterised by alluvial deposits. These have been shown to preserve important archaeological remains dating from the pre-historic period. A preliminary site evaluation may therefore be required before development proposals are considered.</p>
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**BHL2 North**  
Car Wash Site



**KEY**

	Site area		Wetlands pedestrian/cycle route
	Proposed neighbourhood centre		Proposed crossing point
	Wetlands gateway		Active edge required
	Blackhorse Lane area gateway		Severance
	Principal road		Noise
	Busy junction needs improvements		

**Figure 22 Site BHL2 North design principles**

## 4.4 Site BHL2 South - Blackhorse Road/ Hawarden Road

<b>Site reference</b>	BHL2 South
<b>Site name</b>	Blackhorse Road/ Hawarden Road
<b>Site area (ha)</b>	1.7
<b>Current use</b>	This site is currently vacant.
<b>Planning history</b>	2004 – Approval for an advertising hoarding.
<b>Context</b>	<p>This broadly triangular shaped site lies to the south of the Barking to Gospel Oak railway line and is very close to Blackhorse Road Station. The southern edge is largely defined by the rear of Hawarden Road properties and the Douglas Ayre playing fields.</p> <p>Walthamstow town centre can be reached via Blackhorse Road tube station in approximately 10 minutes, and there are a number of bus routes that run close to the site. The destinations of these routes include Stratford, Wood Green and Ilford.</p>
<b>PTAL</b>	4
<b>Proposed land use</b>	Education. A secondary school for 6 forms of entry. (Temporary storage uses deemed appropriate in the short term as these would not preclude later development for education purposes.)
<b>Issues/ Opportunities</b>	<p><b>Access</b></p> <p>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.</p>



Due to the developments impact on the Standard Junction, contributions will also be sought towards the improvements set out in figure 19. An additional pedestrian crossing further south along Blackhorse Road to the site may also be necessary.

Proposals should explore opportunities to provide access to the Douglas Ayre playing fields to the west of the site, given the benefits this would provide in conjunction with the proposed use.

### **Building heights**

The site is adjacent 2 storey residential properties on Hawarden Road and is opposite Opportunity Site BHL8: 152/154 Blackhorse Road; which is anticipated to bring an increase to the existing building heights. Given this context, building heights of 2 to 4 storeys would be appropriate.

### **Prominent location**

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.

### **Level variation**

The existing arrangement shows a drop in level between Blackhorse Road and the site area below. Proposals should address this level change and show a built edge that fully connects with the street.

### **Noise and air pollution**

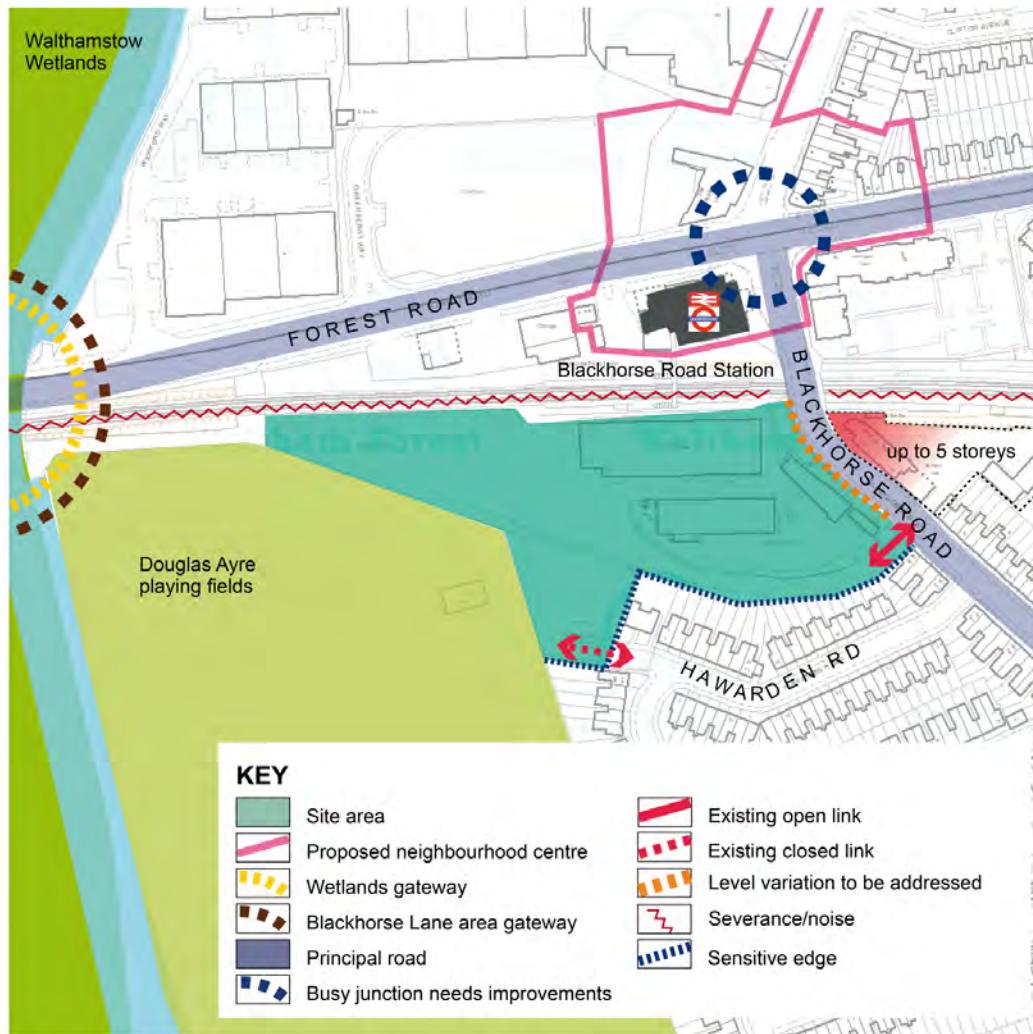
The site is adjacent to the Barking to Gospel Oak railway line and Blackhorse Road which is one of the borough's principal roads. Noise and air quality assessments will therefore be required, and depending on the findings, mitigation measures may be needed.

### **Trees**

	<p>The Council will encourage the protection, maintenance and enhancement of trees which are of public amenity and nature conservation value. Therefore appropriate adequate provision should be made for the protection of existing trees and the planting of new locally indigenous species wherever possible.</p> <p><b>Walthamstow Wetlands</b></p> <p>Given the sites proximity to the wetlands, developers will need to minimise any potential disturbance to wintering waterfowl during the demolition and construction phases.</p> <p><b>Residential neighbours</b></p> <p>Consideration should be given to the amenity and privacy of residential neighbours on Hawarden and Edward Roads and appropriate separation distances should be provided.</p> <p><b>Contaminated land</b></p> <p>There is the possibility of contaminated land due to previous uses, which should be assessed and mitigated before development commences.</p> <p><b>Archaeological Priority Zone (APZ)</b></p> <p>The site lies within the River Lea Valley APZ which is characterised by alluvial deposits. These have been shown to preserve important archaeological remains dating from the pre-historic period. A preliminary site evaluation may therefore be required before development proposals are considered.</p>
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**BHL2 South**

Blackhorse Road/Hawarden Road



**Figure 23 Site BHL2 South design principles**

## 4.5 Site BHL3 - Willowfield School, Tavistock Avenue

<b>Site reference</b>	<b>BHL3</b>
<b>Site name</b>	Willowfields School
<b>Site area (ha)</b>	1.1
<b>Current use</b>	Secondary school
<b>Planning history</b>	2006 – Approval to install security fencing to Tavistock Avenue and Blackhorse Lane boundaries.  2003 – Approval to install storage container.
<b>Context</b>	This is the site of an existing secondary school and is surrounded by two storey Victorian houses. The eastern and western edges of the site are defined by the rear gardens of properties facing onto Pembar Avenue and Blackhorse Lane, and the north and south face onto Tavistock Avenue and Clifton Avenue.
<b>PTAL</b>	3
<b>Proposed land use</b>	Education
<b>Issues/ Opportunities</b>	<p><b>Existing school buildings</b></p> <p>The school buildings are not locally or statutorily listed, however there are two sections adjacent to Tavistock Avenue that provide a typical example of a Victorian school. These sections have heritage interest and therefore developers should seek to retain where possible.</p> <p><b>Access/parking</b></p> <p>The development of this site to a primary school is likely to generate an increase in traffic around the site. Proposals should therefore be accompanied by a school travel plan and transport assessment.</p> <p><b>Public realm improvements</b></p>



Site reference	BHL3
	<p>Depending on the outcomes of the school travel plan, developers may be required to provide crossing points to improve pedestrian access to the site.</p> <p>Proposals, where possible, should also seek to bring activity and natural surveillance to the edges of Tavistock Avenue and Clifton Avenue. The Tavistock Avenue edge of the site in particular feels hostile largely due to the high security fencing.</p> <p><b>Building heights</b></p> <p>The site lies within a largely 2 storey residential context and therefore building heights of 2-3 storeys would be appropriate in ensuring development is not overbearing on surrounding uses.</p> <p><b>Residential neighbours</b></p> <p>The eastern and western edges of the site abut the rear gardens of houses on Blackhorse Lane and Tavistock Avenue. These edges should be treated sensitively ensuring appropriate separation distances are achieved.</p> <p><b>Trees/shrubs</b></p> <p>There are a number of trees and shrubs on and along the periphery of the site. The Council will encourage the protection, maintenance and enhancement of those that have public amenity and nature conservation value. Where appropriate adequate provision should be made for their protection and new locally indigenous species should be planted wherever possible.</p>

### BHL3

Willowfields School

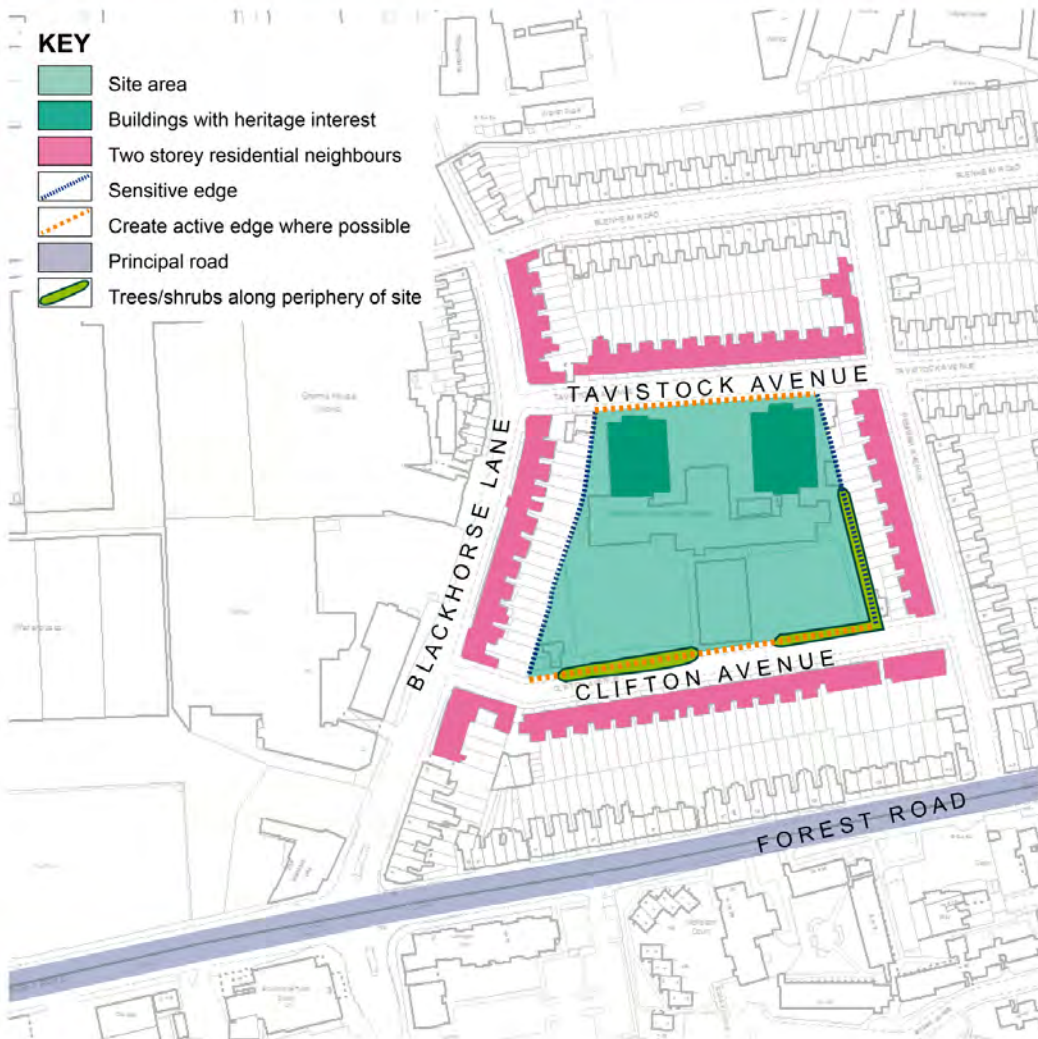


Figure 24 Site BHL3 design principles

## 4.6 Site BHL4 North - Sutherland Road

<b>Site reference</b>	BHL4 North
<b>Site name</b>	Sutherland Road
<b>Site area (ha)</b>	2.16
<b>Current use</b>	The site comprises of a combination of existing small and medium industrial units, with some modern residential development on the south-eastern portion of the site.
<b>Planning history</b>	<p>2012 - Full planning permission granted for 43 residential units at 22 Sutherland Road</p> <p>2011 – Outline permission for 45 residential units at 22 Sutherland Road</p> <p>2009 – Full planning permission for 40 residential units (8 x 2 bed, 24 x 3 bed, and 8 x 4 bed) at land adjoining Unity Works, Sutherland Road</p>
<b>Context</b>	<p>The site covers an area comprising a number of smaller sites, largely in private ownership. The area forms part of a Borough Employment Area designation in our adopted Core Strategy. Historically the majority of buildings have been 1-3 storey small and medium industrial units, but successive planning permissions granted under the Blackhorse Lane Interim Planning Policy Framework for the area has seen a move towards higher density residential schemes; particularly on the eastern side of Sutherland Road.</p> <p>Outside of the site boundary, 2 storey Victorian terrace properties exist to the north, east and west. Successive planning permissions both on this and adjacent opportunity sites means the character of the area is changing significantly; with a recent shift towards contemporary medium rise residential.</p>
<b>PTAL</b>	2
<b>Proposed land use</b>	Mixed use including approximately 160 residential units, 2850m <sup>2</sup> new/refurbished B1 business space, 300m <sup>2</sup> new retail space and a new D1 health centre.

<p><b>Issues/ Opportunities</b></p>	<p><b>Employment</b></p> <p>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 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.</p> <p>Given the employment designation that covers the area, and the cumulative impact successive residential permissions have had on changing this character, it is important that future proposals maximise the provision of new, fit for purpose B1 business space that makes a positive contribution towards a vibrant mixed use area. Proposals will be expected to demonstrate an uplift in employment levels on site and also that the level of fit for purpose B1 space provided is the maximum that can be secured on viability grounds, as part of a high quality development that offers wider benefits. Whilst it is recognised that providing new B1 business space impacts on a schemes viability, the Borough Employment Area designation that covers the site means that the Council will place high priority on the need to provide new, fit for purpose business space.</p> <p><b>Housing</b></p> <p>To help address housing need, and enhance the physical image of the area, there is scope for some additional residential use interspersed amongst the new B1 business units. Permissions referred to in the planning history above has already established that residential development is acceptable on some plots, whilst full details of other areas where residential is considered acceptable as part of a vibrant, mixed use area as set out in the Urban Design Framework. As set out above, due to the employment designation covering the area, a careful balance needs to be struck between business and residential uses, and schemes that fail to provide significant employment benefits will be unacceptable.</p> <p><b>Social infrastructure</b></p>
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The scale of growth in the wider area increases demand for health facilities. As set out in the Urban Design Framework, as part of the redevelopment of this area there is scope for a new such facility at the junction of St Andrews Road and Sutherland Road.

**Decentralised Energy**

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.

**Public realm**

Currently the pedestrian environment is unattractive and unsafe, with a lack of natural surveillance. 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. New uses should also provide active frontages to the public realm to enhance opportunities for natural surveillance.

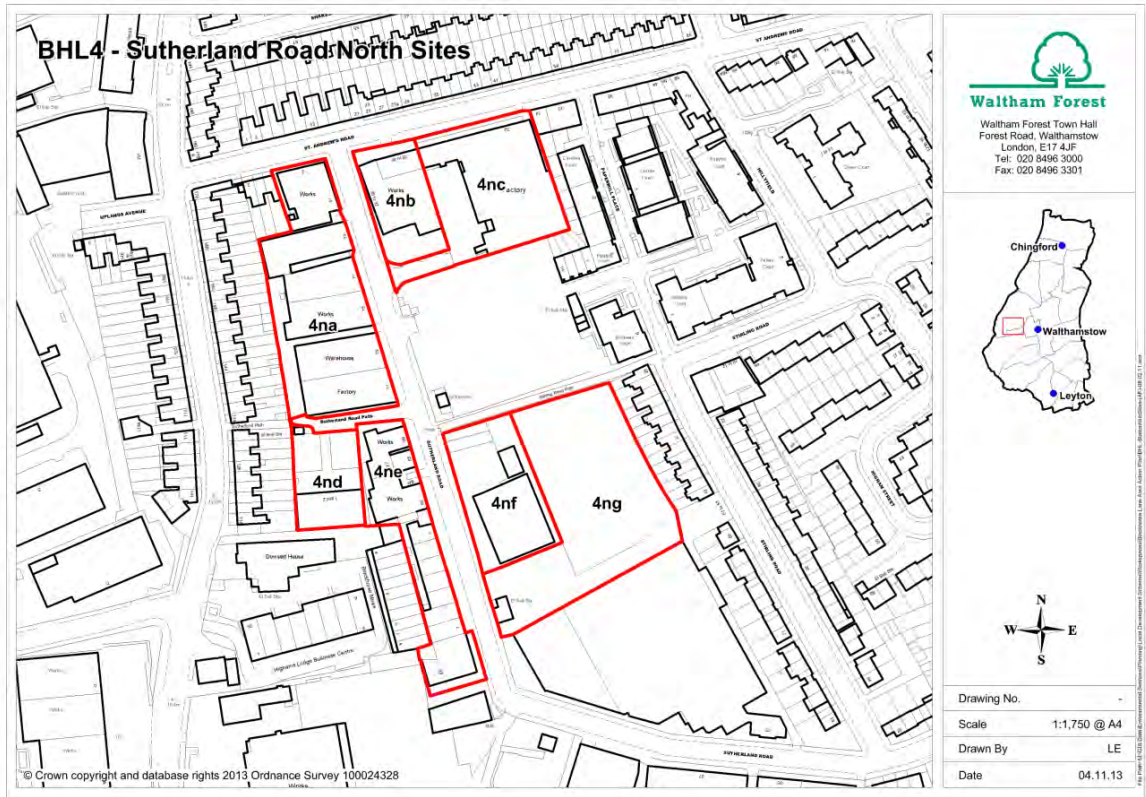
**Building heights**

Existing building heights are low but there is an emerging context of higher density development to the east of Sutherland Road. As set out in the Urban Design Framework, a mix of building heights from 2-4 storeys will enable to development to sit comfortably with the existing and emerging context.

**Land ownership**

The site is in multiple ownerships. To enable development to come forward in a phased manner that reflects land ownerships, the Council has prepared a detailed masterplan for the area as part of the Urban Design Framework. 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.

# Blackhorse Lane AAP Incorporating Modifications

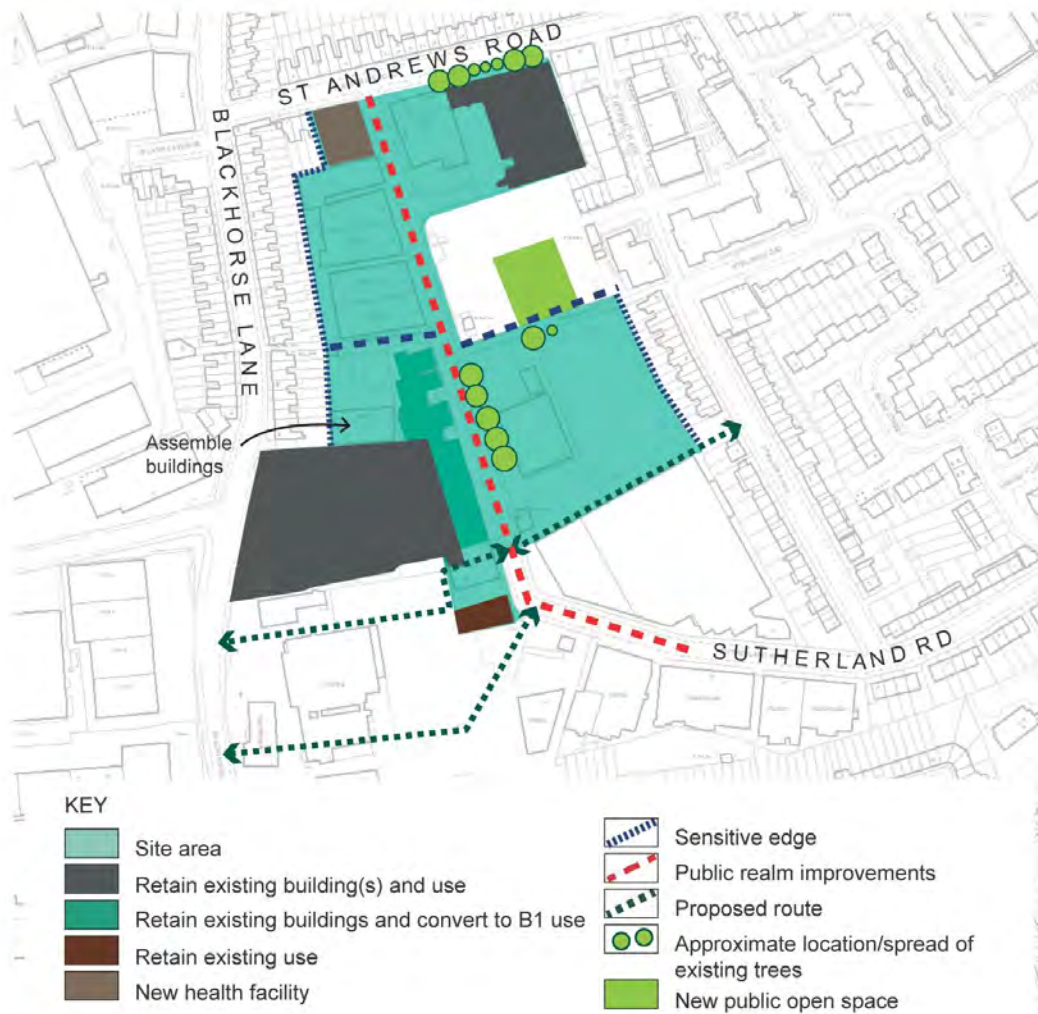


**Waltham Forest**  
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 Fax: 020 8496 3301



Drawing No.	-
Scale	1:1,750 @ A4
Drawn By	LE
Date	04.11.13

**BHL4 North**  
Sutherland Road



**Figure 25 Site BHL4 North design principles**

## 4.7 Site BHL4 South - Sutherland Road

<b>Site reference</b>	BHL4 South
<b>Site name</b>	Sutherland Road South
<b>Site area (ha)</b>	1.33
<b>Current use</b>	The site forms part of a wider development area which is largely comprised of small and medium industrial units. Some of the units on this site are vacant, and there are also offices for a community outreach facility.
<b>Planning history</b>	<p>2012 - Approval of planning permission for 110 residential units, 290m<sup>2</sup> B1 space and 142m<sup>2</sup> of flexible commercial space at Unity Works.</p> <p>2010 – Refusal to change the use of Sutherland House to a social centre.</p> <p>2008 – Approval to install telecommunications equipment on Sutherland House.</p> <p>2003 – Refusal to change of use of Sutherland House to a Church.</p>
<b>Context</b>	<p>This site fronts onto the north and south edges of Sutherland Road and is adjacent to the recently built contemporary residential scheme of up to 5 storeys (Unity Works) to the north. It backs onto Victorian houses to the East and the Webb's Industrial Estate (Site BHL6) to the south and west. Opportunity Site BHL4 North is located at the northern edge of the site.</p> <p>Blackhorse Road Station, the proposed new neighbourhood centre, and Walthamstow Wetlands can all be reached within ten minutes by foot.</p> <p>Existing buildings include a mix of dated 1-3 storey warehousing and office buildings that landowners have struggled to let and subsequently provide a low level of employment. Subsequently on the northern portion of the site a mixed use scheme incorporating high quality new B1 business space has been approved.</p>
<b>PTAL</b>	1b/2



<p><b>Proposed land use</b></p>	<p>A mixed use development with 1940m<sup>2</sup> B1 use, 140m<sup>2</sup> retail space, approximately 200 residential units above, and retained community uses.</p>
<p><b>Issues/ Opportunities</b></p>	<p><b>Employment</b></p> <p>Given the employment designation that covers the area, and the cumulative impact successive residential permissions have had on changing this character, it is important that future proposals maximise the provision of new, fit for purpose B1 business space that makes a positive contribution towards a vibrant mixed use area. Proposals will be expected to demonstrate an uplift in employment levels on site and also that the level of fit for purpose B1 space provided is the maximum that can be secured on viability grounds, as part of a high quality scheme that offers wider benefits. Whilst it is recognised that providing new B1 business space impacts on a schemes viability, the Borough Employment Area designation that covers the site means that the Council will place high priority on the need to provide new, fit for purpose business space.</p> <p><b>Housing</b></p> <p>To help address housing need, and enhance the physical image of the area, there is scope for some additional residential use alongside new B1 business units. As set out above, the mix of residential and business space will be important and must respect the employment designation covering the area. Proposals should seek to maximise business space, which could include through some live-work units.</p> <p><b>Public realm/access</b></p> <p>The area generally suffers from a lack of east-west connections. The development of this site provides an opportunity to improve the permeability by extending the proposed green link through Site BHL6 through to Stirling Road, by upgrading the existing footpath and orientating buildings so that it becomes an attractive feature of the public realm.</p> <p>Additional public realm improvements should also be made to improve the quality of environment for pedestrians and cyclists. This should include street trees to soften the hard form of built development, and strengthen associations with the nearby open</p>

	<p>spaces of Lee Valley Regional Park and Walthamstow Wetlands. A Public Realm Masterplan for the Sutherland Road Area is being prepared.</p> <p><b>Activity</b></p> <p>Proposals should seek to bring natural surveillance and activity to the edge of Sutherland Road and to the edge of the proposed east-west link as both of these areas will form part of the public realm.</p> <p><b>Existing residential neighbours</b></p> <p>The east of the site is adjacent to existing residential neighbours. Consideration should be given to the privacy and amenity of these neighbours by providing appropriate separation distances to habitable rooms.</p> <p><b>Decentralised Energy</b></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> <p><b>Trees</b></p> <p>There are a number of trees on or adjacent to the site, for example the street trees adjacent to the outreach centre and along the southern boundary with the Webbs site. The merit of these trees should be considered and where necessary incorporated into proposals with consideration given to their protection during construction and their distance from proposed buildings (allowing for future growth enabling sufficient light to enter windows).</p> <p><b>Building heights</b></p>
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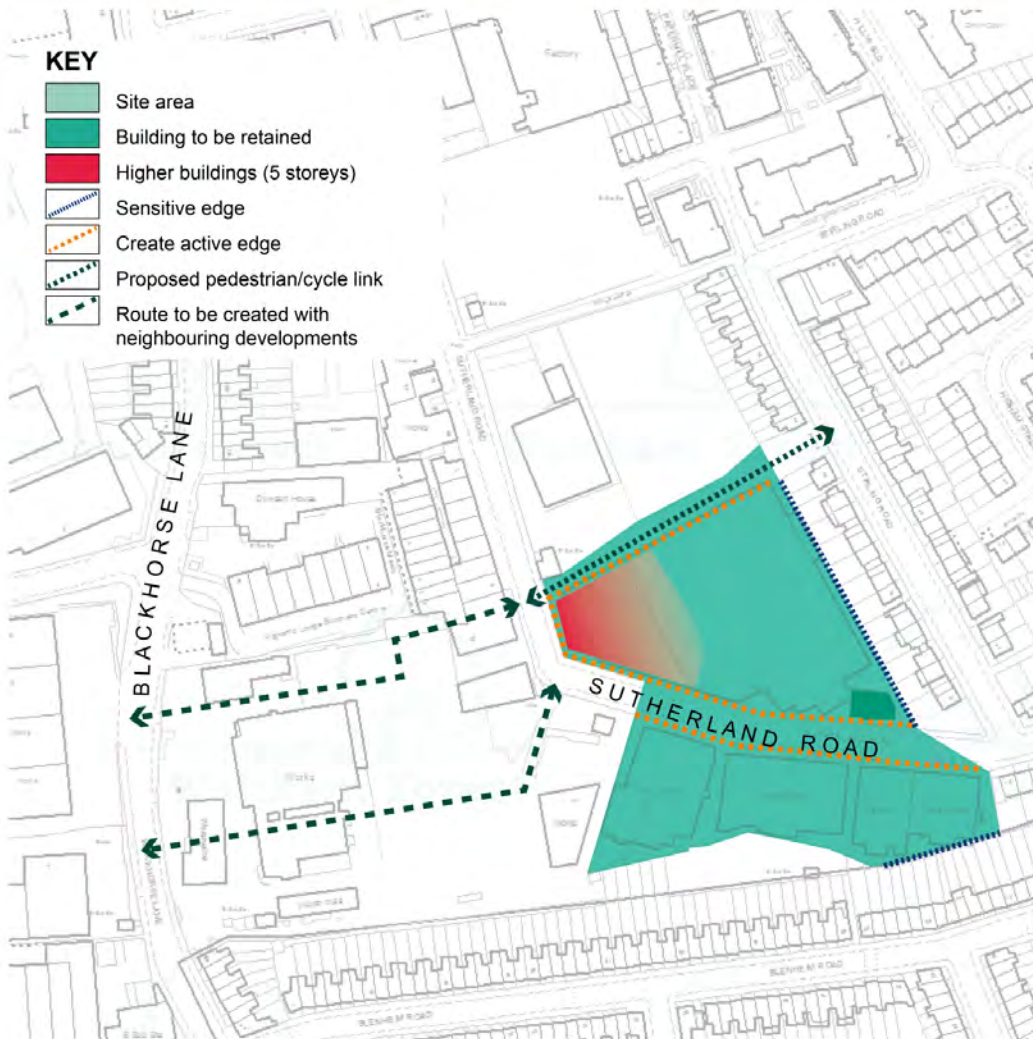
	<p>Given the sites context of 2 storey residential neighbours and the anticipated increase in building heights of nearby developments, building heights of 2-5 storeys would be appropriate for this site with the taller element towards the north west of the site edging Sutherland Road.</p> <p><b>Land ownership</b></p> <p>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>
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# Blackhorse Lane AAP Incorporating Modifications





**BHL4 South**  
Sutherland Road South



**Figure 26 Site BHL4 South design principles**

## 4.8 Site BHL5 - Papermill Place

<b>Site reference</b>	BHL5
<b>Site name</b>	Papermill Place
<b>Site area (ha)</b>	1.09
<b>Current use</b>	323 residential units (127 x 1 bed, 149 x 2 bed, 37 x 3 bed, 10 x 4 bed)
<b>Planning history</b>	<p>2006 – outline planning permission for mixed use redevelopment comprising 3220m<sup>2</sup> industrial development and 37 live-work units (3950m<sup>2</sup> floorspace) on western portion of site and full planning permission on the remainder for 241 residential units (105 x 1 bed, 117 x 2 bed, 17 x 3 bed and 2 x 4 bed), involving the erection of buildings ranging between 3 and 6 storeys in height, provision of surface and basement.</p> <p>2008 – full permission granted for 4-6 storey development to provide 115 apartments in the southern portion of the site (superceding part of earlier outline permission)</p> <p>2010 – full planning permission granted for 4-6 storey development to provide 82 residential units (22 x 1 bed, 32 x 2 bed, 20 x 3 bed and 8 x 4 bed), associated car, cycle and motor cycle parking, refuse and recycling storage facilities, and a new public open park (superseding outline element of permission 2006/0064)</p>
<b>Context</b>	The site forms part of what was in the past a larger industrial estate covering the Sutherland Road area. As warehouses and factory buildings dated and proved increasingly difficult to let, the implementation of the above planning permissions have signalled a shift towards medium density contemporary residential development in the area. Surrounding this uses include a combination of low rise industrial units and Victorian terraced properties.
<b>PTAL</b>	2
<b>Proposed land use</b>	As current use set out above
<b>Issues/ Opportunities</b>	<b>Design quality</b>

	<p>The succession of planning permissions referred to above have now been implemented. This has resulted in a contemporary residential development that makes a positive contribution towards the amenity of the local area. Phases 1 and 2 were highly commended in the London Evening Standard New Homes Awards for its high quality design. The scheme overcomes the unsightly nature of previous industrial uses and through its high quality design can help contextualise and encourage further investment in the area.</p> <p><b>Mixed communities</b></p> <p>The mix of dwellings secured provides for a sustainable mix of property types and tenures. This helps address housing need in the borough, including for families (through the inclusion of 3 and 4 bedroom properties) and first time buyers (through products such as affordable shared ownership and rent now buy later).</p> <p><b>Public realm</b></p> <p>The development has also secured community benefits through the provision of a new public park incorporating an area for children’s play adjacent Sutherland Road path and a more welcoming environment for pedestrians to use the pathway for east-west movements to and from Blackhorse Road station.</p>
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## 4.9 Site BHL6 - Webb's Industrial Estate

<b>Site reference</b>	BHL6
<b>Site name</b>	Webb's Industrial Estate
<b>Site area (ha)</b>	1.67
<b>Current use</b>	Predominantly container and scaffolding storage, with some small industrial units to the western side; including the manufacture of buckles and clothing trimmings.
<b>Planning history</b>	2011– Outline consent for mixed use development including 235 residential units (83 x 1 bed, 104 x 2 bed, 40 x 3 bed, 8 x 4 bed), 786m <sup>2</sup> of B1 Artisan Workshops, 1099m <sup>2</sup> of retail space (A1/A2/A3), highways alterations, an energy centre, and creation of new public realm works, landscaping and car parking.
<b>Context</b>	<p>The site is currently largely used for storage purposes, with a large open area and a limited number of small, predominantly 1 storey industrial units on site. 1-3 storey commercial and industrial uses are located mainly to the northern and western aspects of the site, with some additional industrial units immediately to the east. Residential is also a common use in the area, in the form of Victorian terraced housing to the south along Blenheim Road, and contemporary medium density schemes to the north-east such as Papermill Place (site BHL5).</p> <p>The estate backs onto Blackhorse Road and as such is potentially easily accessible from the tube and overground station (less than 450 metres away).</p>
<b>PTAL</b>	2/3
<b>Proposed land use</b>	Existing outline planning permission establishes appropriate uses and quantum of development for the site.
<b>Issues/ Opportunities</b>	<p><b>Intensification</b></p> <p>Webb's Industrial Estate is currently an underutilised site with a poor physical appearance. As a brownfield site close to Blackhorse Station, opportunities exist for intensification that can secure regeneration benefits.</p>



	<p><b>Employment</b></p> <p>Whilst the site falls within a Borough Employment Area as designated by the adopted Core Strategy, the nature of uses means the actual quantum of employment on site is low (recently estimated to be supporting only 77 jobs). A mixed use development can therefore support an increased job provision through the introduction of higher employment generating uses such as quality B1 units for creative industries and small scale retail and/ or social infrastructure; whilst also addressing local housing need and making environmental enhancements. In determining the recent outline application it was estimated that proposals would uplift the job creation on site to 175 jobs.</p> <p><b>Permeability</b></p> <p>Situated between Blackhorse Road station and existing and emerging residential communities to the north east, the site offers an opportunity for improved public realm and permeability in the area through the introduction of new east-west links in accordance with the Sutherland Road Public Realm Masterplan. Pedestrian/ cycle links can provide an attractive communal amenity facility, whilst as set out in the Urban Design Framework, the provision of separate vehicular access could serve new employment units.</p> <p><b>Active frontages</b></p> <p>Current land use patterns fail to address the sites most prominent boundaries; i.e. Sutherland Road and Blackhorse Lane. Redevelopment offers opportunities for the introduction of active frontages at both of these boundaries to enhance the physical image of the area.</p> <p><b>Sensitive uses</b></p> <p>To the immediate south of the site, 2 storey terraced residential exists. It is therefore important that this boundary is treated sensitively so neighbouring properties do not suffer from loss of light etc.</p> <p><b>Decentralised Energy</b></p> <p>Planned developments in the Sutherland Road area are anticipated to provide sufficient heat demand for the creation</p>
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	<p>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</p> <p>in the design process, in addition to other local environmental aspects.</p>
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### BHL6

#### Webb's Industrial Estate

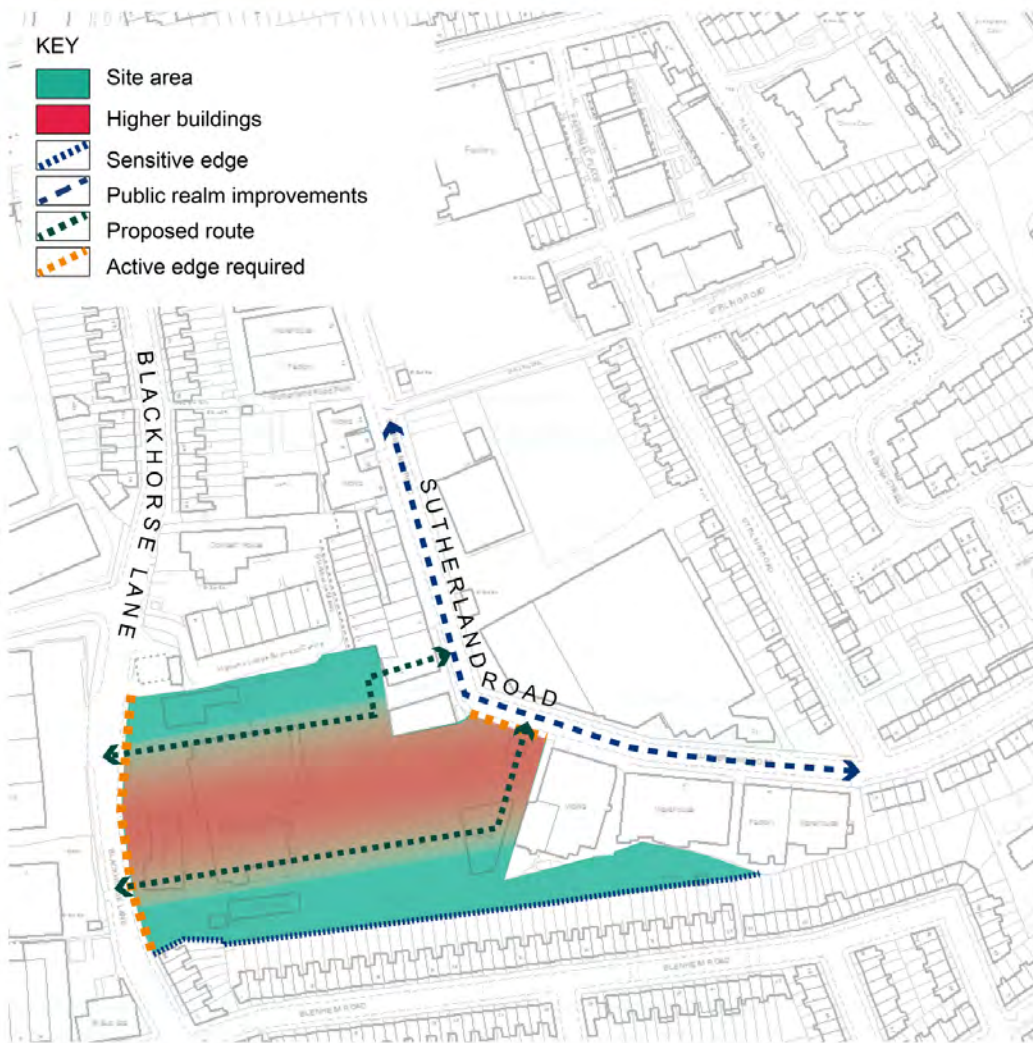


Figure 27 Site BHL6 design principles

## 4.10 Site BHL7 - Billet Works

<b>Site reference</b>	BHL7
<b>Site name</b>	Billet Works
<b>Site area (ha)</b>	3.35
<b>Current use</b>	The existing site area includes low level workshop buildings, a 1970s 5-storey office building, and 2 storey Victorian warehouse buildings. It also has a retail frontage to Billet Road.
<b>Planning history</b>	<p>2013 - permission for mixed use development including 349 residential units, 792m<sup>2</sup> retail (A1-A3), 874m<sup>2</sup> office floorspace (B1), and 444m<sup>2</sup> community space and crèche (D1), 271 car parking spaces, 710 cycle spaces, modified access and provision of amenity space.</p> <p>2012 – permission for mixed use development including 344 residential units (37 x 1 bed, 128 x 2 bed, 142 x 3 bed and 37 x 4 bed), 787m<sup>2</sup> retail (A1-A3), 1119m<sup>2</sup> office floorspace (B1), 496m<sup>2</sup> community space and crèche (D1), 293 car parking spaces, 696 cycle spaces and provision of amenity space.</p> <p>2010 – refusal of mixed used development including 562 dwellings, 863m<sup>2</sup> retail (A1-A3), 910m<sup>2</sup> business space (B1), and 1801m<sup>2</sup> of leisure/ community facilities (D2).</p>
<b>Context</b>	<p>Whilst the site is predominantly in industrial use, the condition of existing buildings is poor. In 2008 the entire site area was estimated to employ 154 people.</p> <p>To the north, the site is bounded by the Cheney Row Open Space and by playing fields within the grounds of Walthamstow Academy to the east. 2 storey inter-war housing exists to the south, and Billet Road Local Retail Parade to the west.</p> <p>Blackhorse Road Station is 1.8km to the south west of the site. The Crooked Billet roundabout (junction with the North Circular Road) is approximately 500m to the east. Bus routes 158, W15 and W16 operate within 640m of the site.</p>
<b>PTAL</b>	2



<p><b>Proposed land use</b></p>	<p>Existing permission establishes appropriate uses and quantum of development for the site.</p>
<p><b>Issues/ Opportunities</b></p>	<p><b>Design quality</b></p> <p>Existing uses result in an untidy image on this prominent location. Redevelopment brings an opportunity for a high quality contemporary design, including new fit for purpose, flexible, employment space for small businesses, and small scale retail to provide an active frontage to Billet Road.</p> <p><b>Housing</b></p> <p>Intensification can help address housing need in the area. In particular, proximity to local schools means the site lends itself towards a significant proportion of family housing. This is also consistent with requirements for lower density development than sites closer to Blackhorse Road Station.</p> <p><b>Building heights</b></p> <p>The site is largely surrounded by 2 storey development, but is large enough to define its own character. To respect existing patterns of development, a stepping up of storeys is necessary. In doing so, a range of storeys between 2 and 5 is achievable.</p> <p><b>Open space</b></p> <p>The site is bounded by open space to the north, including Cheney Row Open Space, and Lee Valley Regional Park. Development should exploit such assets through the introduction of physical and visual links to such space.</p> <p><b>Community facilities</b></p> <p>Through comprehensive redevelopment, there is scope for provision of social infrastructure to benefit residents of the scheme and those in the surrounding neighbourhood. The permitted scheme makes provision for a meeting space for local community groups, and a crèche.</p> <p><b>Transport</b></p> <p>Relative to other opportunity sites in the Blackhorse Lane area, public transport accessibility is poor. Developer contributions for matters such as increasing bus capacity is therefore necessary.</p>

## BHL7

Billet works



Figure 28 Site BHL7 design principles

## 4.11 Site BHL8 - 152/154 Blackhorse Road

<b>Site reference</b>	BHL8
<b>Site name</b>	152/154 Blackhorse Road
<b>Site area (ha)</b>	0.19
<b>Current use</b>	Offices & builders yard
<b>Planning history</b>	<p>2011 – Refusal to increase in height of the garage/workshop at rear to incorporate mezzanine floor and change the use of the building to form student common room for adjacent college.</p> <p>2011 – Approval to continue the use of the first and second floors as a training college</p> <p>2006 – Approval to install telecommunications equipment.</p> <p>2000 – Approval to install telecommunications equipment.</p>
<b>Context</b>	This site is currently occupied by a 3 storey 1970s office building and builder's yard and is very close to Blackhorse Road station. The Barking to Gospel Oak railway line runs to the north, and Victorian terraces characterise the south.
<b>PTAL</b>	3-4
<b>Proposed land use</b>	Mixed use with commercial uses on the ground floor (approximately 650m <sup>2</sup> ) and approximately 40 residential units above. Commercial uses could include B1 business space, social infrastructure, or leisure uses such as a gymnasium.
<b>Issues/ Opportunities</b>	<p><b>High profile location</b></p> <p>This site is in a high profile location on one of the Blackhorse Lane area gateways. Proposals should therefore show the highest quality of design to help enhance to image of the area.</p> <p><b>Building heights</b></p> <p>The existing building is 3 storeys, and its immediate residential neighbours are 2 and 3 storey. Latchington Court which lies adjacent but on the other side of the railway line is 4 storeys.</p>

	<p>Given this context building heights of 3 to 5 storeys would be appropriate for this site with the lower element located to respect the amenity and building heights of existing residential neighbours.</p> <p><b>Access</b></p> <p>Uses should not exacerbate traffic congestion around standard junction and therefore a traffic assessment will be required.</p> <p>Contributions will be sought to improve crossing points around the Standard junction and improve public access to the Walthamstow Wetlands.</p> <p><b>Nature of residential element</b></p> <p>The Council would expect to see medium to high residential densities in this location, and whilst the site is outside the proposed neighbourhood centre would also anticipate proposals that attract young professionals who could benefit from good links into London. This is likely to see proposals that show a larger number of flatted units with the emphasis of amenity space provision being quality rather than quantity.</p> <p><b>Parking</b></p> <p>Given the sites close proximity to Blackhorse Road station and that there are a number of buses that run along Blackhorse Road, this would be an appropriate location for a car free development for the residential element of the scheme.</p> <p><b>Trees</b></p> <p>There are trees on or adjacent to the site, for example 2 street trees to the front and large trees in the builder's yard to the rear. The merit of these trees should be considered and where necessary incorporated into proposals with consideration given to their protection during construction and their distance from proposed buildings (allowing for future growth enabling sufficient light to enter windows).</p>
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**BHL8**

152/154 Blackhorse Road



**Figure 29 Site BHL8 design principles**

## 4.12 Site BHL9 - Former Essex Arms Public House

<b>Site reference</b>	BHL9
<b>Site name</b>	Former Essex Arms Public House
<b>Site area (ha)</b>	0.14
<b>Current use</b>	Mixed use; 436 m2 A1 retail store at ground floor (occupied by Tesco Express), with 17 residential units above (6 x 1 bed, 8 x 2 bed and 3 x 3 bed).
<b>Planning history</b>	2009 – full planning permission granted for above uses and associated car and cycle parking
<b>Context</b>	<p>The site was previously occupied by the Essex Arms Public House, which closed down in 2007.</p> <p>3-4 storey social housing abuts the site boundaries, with 2 storey terraced properties opposite. The site fronts onto Forest Road, a key route through to Walthamstow to the east, and Tottenham to the west. There is a bus stop immediately outside the site, served by the 123.</p> <p>A small parade of shops is in close proximity to the site on both sides of Forest Road. This includes uses such as newsagents, takeaways, a launderette, letting agents.</p>
<b>PTAL</b>	4
<b>Proposed land use</b>	As current use set out above.
<b>Issues/ Opportunities</b>	<p><b>Positive use of site</b></p> <p>Development of the site in accordance with application 2009/1429 has now been completed. Prior to development numerous complaints had been received regarding antisocial behaviour, flytipping and rough sleepers. Redevelopment has helped overcome this, whilst also making a positive contribution to the streetscape through the use of a contemporary palette of materials and a scale consistent with its surroundings.</p> <p><b>Housing need and local convenience shopping</b></p>

	<p>The provision of a mix of affordable housing products in the scheme helps address local housing need, whilst the retail element helps improve the modest local convenience offer in the area for the established residential community.</p> <p><b>Raising design standards</b></p> <p>Along with Papermill Place (see site BHL5), development provides a useful context of how the character of the area is changing. It could also provide a catalyst for further physical enhancements along Forest Road.</p>
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## 4.13 Site BHL10 - Marine Engine House

<b>Site reference</b>	BHL10
<b>Site name</b>	Marine Engine House
<b>Site area (ha)</b>	0.5
<b>Current use</b>	Vacant
<b>Planning history</b>	Planning permission for Walthamstow Wetlands Project granted under application number 2014/0716, which includes proposals for this site.
<b>Context</b>	<p>The Marine Engine House is a former East London Waterworks Company pumping station that was erected in 1894 as part of the Walthamstow reservoirs development. It is located close to the main entrance to the Walthamstow Wetlands at Forest Road and falls approximately half way between Blackhorse Road and Tottenham Hale rail stations.</p> <p>The building is approximately 455 m<sup>2</sup> and single storey with one part having a double height ceiling. It is brick built with fine detailing and makes a positive visual contribution to the landscape of the reservoirs. The building has been recently added to the Council's Local List due to its architectural and historical interest. It is largely empty with some original pumping kit.</p>
<b>PTAL</b>	3
<b>Proposed land use</b>	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.
<b>Issues/ Opportunities</b>	<p><b>Legibility/wayfinding</b></p> <p>The site is not clearly visible from Forest Road. Developers should seek to open views to announce its presence and assist with wayfinding. Where necessary this should be supported with appropriate signage.</p>



	<p><b>Public realm</b></p> <p>Public realm improvements should be made on Forest Road outside the site to highlight this as a special location, assist with wayfinding and celebrate this as a gateway to the Wetlands.</p> <p>A crossing point may also be required outside the site to facilitate easy access for pedestrians and cyclists arriving from the northern edge of Forest Road.</p> <p><b>Access</b></p> <p>Vehicular access to the site would be from Forest Road (as at present), which leads onto a car parking area. The entrance should be welcoming for visitors, and new reception/entrance buildings and improved landscape treatments may be required.</p> <p>Given the location between Tottenham Hale and Blackhorse Road stations, and planned improvements to pedestrian and cycle movements in the locality, it is important that car parking provision is minimal and suitable provision is made for secure cycle storage.</p> <p>Those arriving to the site from Forest Road will be required to travel south to Marine Engine House and pass underneath the Barking to Gospel Oak railway line. At present there are numerous arches/underpasses that allow free movement under the line. These should be retained and improved to bring a offer quality of experience for visitors.</p> <p>It is anticipated that pedestrian and cycle footpaths are to be opened as part of the Wetlands which will enable visitors who are travelling by bicycle or by foot to arrive from the south. The Marine Engine House should provide a sufficient welcome, however landscape improvements may be required.</p> <p><b>Marine Engine House</b></p> <p>The Marine Engine House is locally listed due to its architectural, aesthetic and historical value. It is currently disused.</p> <p>Restoring it for the uses referred to above will help support the Walthamstow Wetland project, provide a positive future use for the building, and provide an important focal and orientation point for visitors.</p>
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	<p>Alterations to the building should seek to retain the original character (such as the vaulted ceiling) and where possible original features should be retained. The café area should maximise the asset of the waterside setting, and the building should be accessible to all.</p> <p><b>Parking</b></p> <p>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.</p> <p>Coach drop off/parking facilities are likely to be required for school trips. Provision should be made for the satisfactory dropping off and picking up of passengers including the manoeuvring of vehicles without the need for reversing.</p> <p><b>Habitat Regulation Assessment</b></p> <p>As the site is immediately adjacent the Lee Valley Special Protection Area and Ramsar Site, a Habitat Regulation Assessment is likely to be required.</p> <p><b>Archaeological Priority Zone (APZ)</b></p> <p>The site lies within the River Lea Valley APZ which is characterised by alluvial deposits. These have been shown to preserve important archaeological remains dating from the pre-historic period. Depending on the works proposed, a preliminary site evaluation may be required before development proposals are considered</p>
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**BHL10**  
Marine Engine House



**Figure 30 Site BHL10 design principles**

## 4.14 Site BHL11 - Old Coppermill

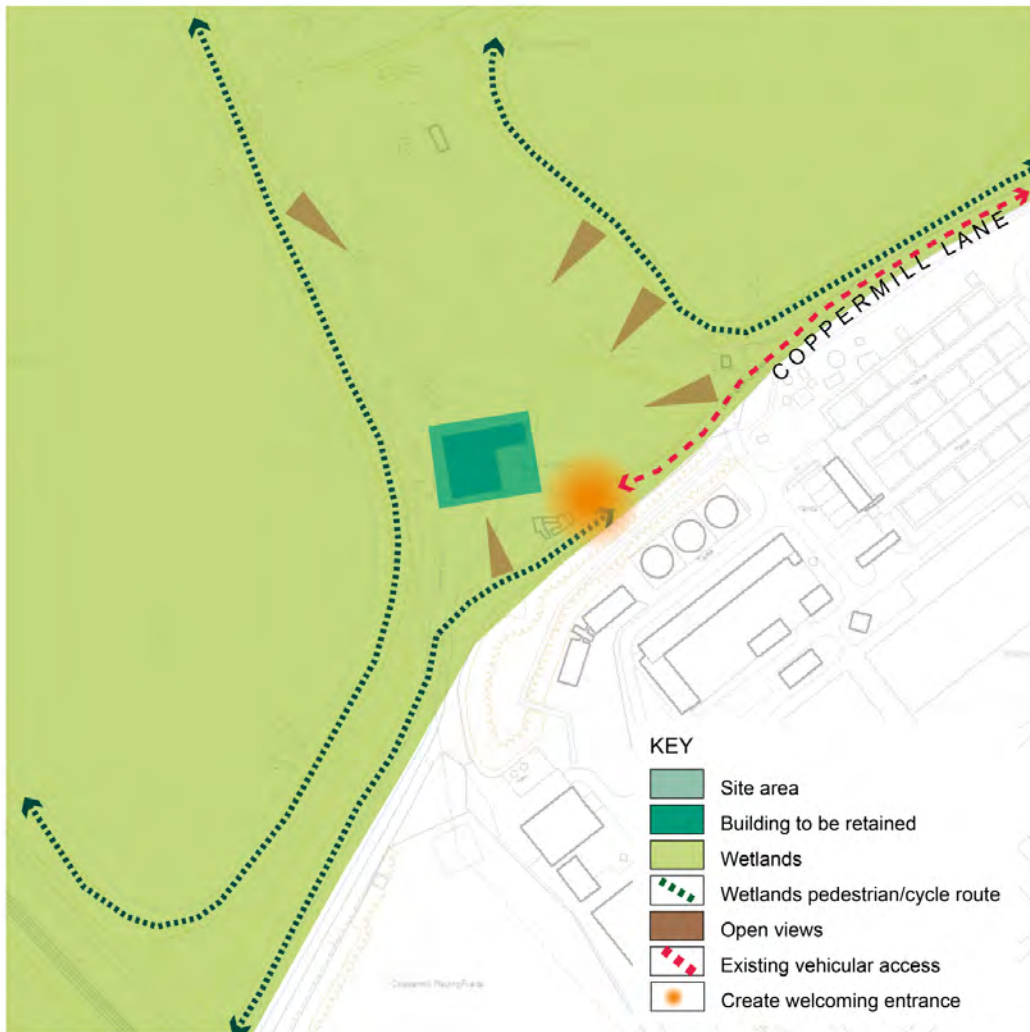
<b>Site reference</b>	BHL11
<b>Site name</b>	Old Coppermill
<b>Site area (ha)</b>	0.76
<b>Current use</b>	The building currently houses Thames Water health and safety training facility and an operational store.
<b>Planning history</b>	Planning permission for Walthamstow Wetlands Project granted under application number 2014/0716, which includes proposals for this site.
<b>Context</b>	<p>The Old Coppermill is a largely 2 storey industrial brick building with an Italianate building tower. It is owned by Thames Water.</p> <p>The site is accessible from Coppermill Lane, and is situated north of Coppermills Water Treatment Works amongst the vast open spaces of Walthamstow Reservoirs and Lee Valley Regional Park.</p> <p>The Old Coppermill is Grade II listed, dating to 1806. According to historic records, the site has been the location of a mill since the 17th Century and Domesday Book records suggest it is probable that a mill has existed on the site since 1066.</p>
<b>PTAL</b>	0
<b>Proposed land use</b>	It is anticipated that this will largely remain a Thames Water training facility and operational store, however a partial conversion is proposed to include a viewing platform in the Italianate tower and related interpretation.
<b>Issues/ Opportunities</b>	<p><b>Grade II listed</b></p> <p>The Old Coppermill is Grade II listed and therefore any alterations would have to be sensitive to the existing fabric of the building.</p> <p>In particular, the Italianate building tower offers potential for conversion into a viewing platform that exploits views across the landscape. 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.</p>



	<p><b>Access</b></p> <p>This site is located at one of the major access points to the Walthamstow Wetlands.</p> <p>It is anticipated that visitors will arrive at the Old Coppermill by foot or bicycle from either Coppermill Lane or one of the footpaths that flow around the reservoirs. These footpaths are not publically accessible at present, however they are planned to be opened as part of the Wetlands project. The Council would like to discourage visitors arriving by car as it is felt this will detrimentally affect the character of Coppermill Lane.</p> <p>The existing Coppermill Lane entrance to the site feels hostile with high palisade fencing and gates to deter members of the public entering. This entrance and other proposed entrances should be improved and made welcoming for visitors, where this would not compromise the privacy and operational requirements of Coppermill Treatment Works.</p> <p><b>Legibility/wayfinding</b></p> <p>The site is not clearly visible from surrounding paths. Proposals should seek to open views to announce the presence of the Old Coppermill which will assist with wayfinding and orientation. Where necessary this should be supported with appropriate signage.</p> <p><b>Parking</b></p> <p>The Council would like to discourage visitors arriving by car to protect the character of Coppermill Lane, proposals will therefore not be required to provide a car park.</p> <p><b>Archaeological Priority Zone (APZ)</b></p> <p>The site lies within the River Lea Valley APZ which is characterised by alluvial deposits. These have been shown to preserve important archaeological remains dating from the pre-historic period. Depending on the works proposed, a preliminary site evaluation may be required before development proposals are considered.</p> <p><b>Habitat Regulation Assessment</b></p>
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	<p>As the site is immediately adjacent the Lee Valley Special Protection Area and Ramsar Site, a Habitat Regulation Assessment is likely to be required.</p>
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**BH11**  
Old Coppermill



**Figure 31 Site BHL11 design principles**

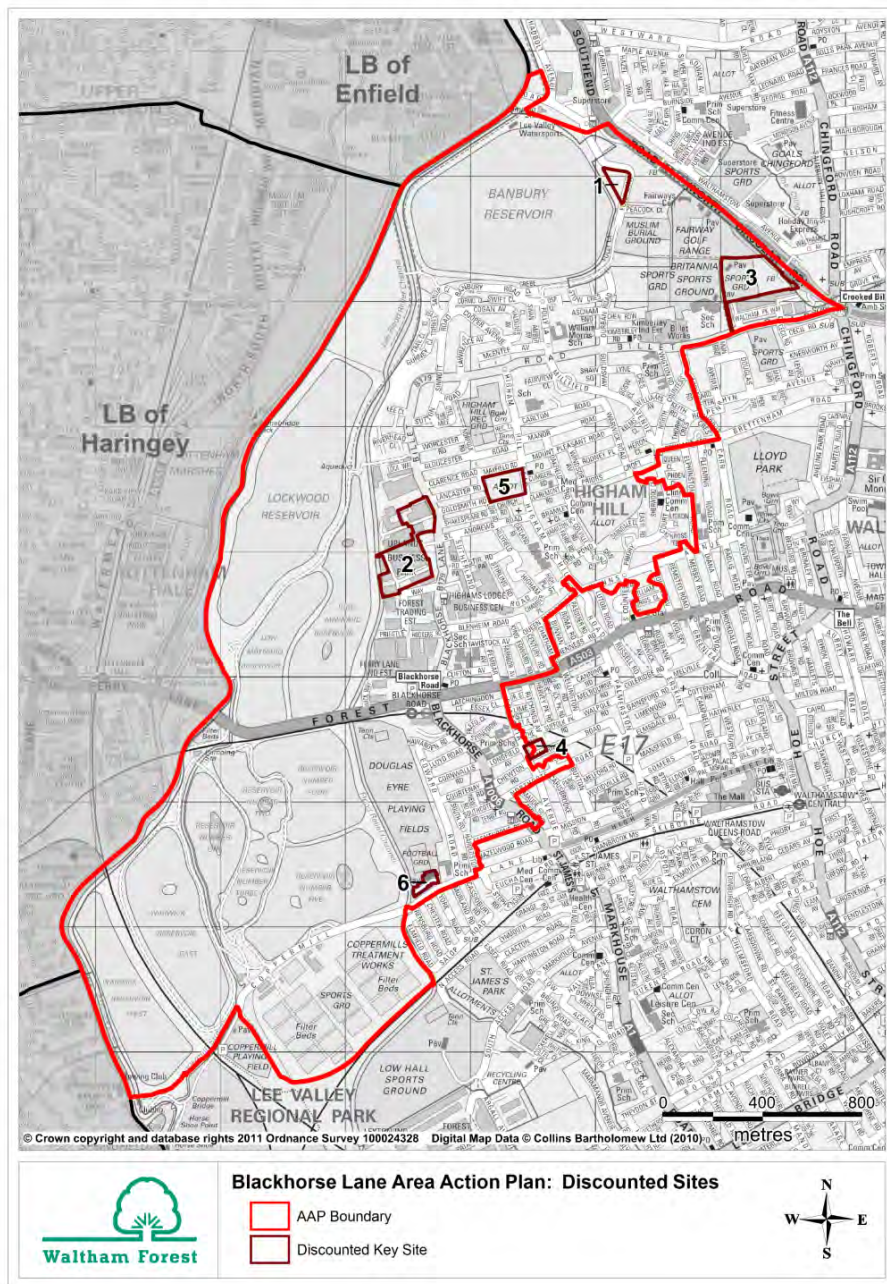
## 4.15 Discounted sites

Site	Proposed use	Reason for discounting
1) Land East of Banbury Reservoir	Employment	Site is designated as a Site of Nature Conservation and falls within the green belt. Developing the site for employment purposes would therefore be contrary to the adopted Core Strategy and the NPPF. Furthermore our evidence suggests the employment needs of the area can be met by using existing land more efficiently, so it is not necessary to designate new sites on greenfield land.
2) Uplands Business Park	Mixed use including employment, retail and residential	Site is designated as SIL in the London Plan, Upper Lea Valley Opportunity Area Planning Framework, and our Core Strategy. Mixed use development is incompatible with, and contrary to, this designation.
3) Kingfisher Sports Ground, Billet Road	Employment	Site is designated as green belt. Developing the site for employment purposes would therefore be contrary to the adopted Core Strategy and the NPPF. Furthermore our evidence suggests the employment needs of the area can be met by using existing land more efficiently, so it is not necessary to designate new sites on greenfield land.
4) Disability Resource Centre, 1A Warner Road	See Site Specific Allocations Preferred Options Document	Only a small portion of the site falls within the current Blackhorse Lane AAP boundary. The site is therefore being considered through the Site Specific Allocations DPD.
5) Trencherfield Allotments	Residential	The NPPF encourages the effective use of land by reusing previously developed land. This has been a principle that has underlined the selection of opportunity sites. Allotments do not fall within the NPPFs definition of previously developed land.
6) Land at Douglas Eyre	Residential	Douglas Eyre Sports Centre provides important local sporting facilities whose loss to alternative



<b>Site</b>	<b>Proposed use</b>	<b>Reason for discounting</b>
Sport Centre, 148 Coppermill Lane		uses should be resisted. Investment in improved sporting facilities will be welcomed in principle, and can be supported by Policy BHL8, and wider Local Plan policies. References to investment in the site are therefore made in the infrastructure plan.

# Blackhorse Lane AAP Incorporating Modifications



**Figure 32 Map of discounted sites. NB site numbers correspond with table of sites**

# Implementation

## 5 Implementation

### 5.1 Introduction

**5.1.1** To ensure regeneration in Blackhorse Lane secures major benefits for both existing and new communities, developments will be expected to contribute to the wider objectives of the area through planning obligations.

**5.1.2** Areas where it is reasonable to request funding towards include:

- affordable housing;
- sustainable transport;
- education and childcare;
- employment and training;
- health facilities;
- recreational open space;
- environmental improvements;
- community facilities;
- climate change;
- community safety.

**5.1.3** Changes in legislation and the introduction of the Community Infrastructure Levy Regulations (2010) (as amended) mean that in the future, section 106 funds 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 support growth, by funding a wide range of 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. 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.

**5.1.4** 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 m<sup>2</sup> of development for all proposals that include at least 100m<sup>2</sup> gross internal floorspace, or at least 1 dwelling.

**5.1.5** Over the lifetime of the AAP, other forms of funding will be available to supplement any developer contributions. Where appropriate we will work with partners to secure such funding in order to maximise gains for the community. This will be

particularly important where infrastructure projects align with other organisations priorities. In addition, if necessary the Council may use its Compulsory Purchase powers to ensure the successful implementation of our plans for the area.

**5.1.6** The successful regeneration of Blackhorse Lane is subject to the delivery of a range of important infrastructure projects. 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. It should be noted that target timescales are indicative only.

## 5.2 Infrastructure Plan

Infrastructure item	Responsible organisation	Funding sources	Target timescale
<b>Transport</b>			
Standard junction improvements and pavement widening	LBWF	Developer contributions, public funding	2014-2016
Upgrades to Victoria Line	TfL	TfL	2012-2013
Electrification of Barking – Gospel Oak overground line	TfL	TfL	2014-2019
Step free access to Blackhorse Road station	TfL	TfL	2014
Increased frequency of buses serving site BHL7	LBWF, TfL	Developer contributions committed from proposed developments at BHL7	2015
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	2014-2016
Provision of car clubs in new developments	Car club operator	Developer contributions	Ongoing



Infrastructure item	Responsible organisation	Funding sources	Target timescale
<b>Public realm</b>			
New access points to Walthamstow Wetlands at Forest Road and Coppermill Lane	Walthamstow Wetlands Partnership	Heritage Lotter Fund and Partner Funding	2014-2016
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
Wayfinding and interpretation within Wetlands	Walthamstow Wetlands Partnership	Heritage Lottery Fund and Partner Funding	2014-2016
Linear park at Station Hub	Landowner, Thames Water, Environment Agency	To be provided as part of development BHL1	2016-2018
New street/ green link at Site BHL6	Landowner	To be provided as part of development BHL6	2014-2016
Pocket park at Papermill Place	LBWF, Landowner	Provided as part of development of BHL5	2013
New linear park at Site BHL7	Landowner	Provided as part of development of BHL7	2014-2016
Corridor scheme at Higham Hill Road	LBWF	Council budget	2013
Improved recreation facilities at Douglas Eyre Sports Complex	London Playing Fields Foundation, LBWF	Developer contributions	2014-2020
Upgraded street lighting at Sutherland Road	LBWF	Council budget	2014
Upgraded street lighting at Higham Hill Road	LBWF	Council budget	2014

Infrastructure item	Responsible organisation	Funding sources	Target timescale
Environmental improvements to Sutherland Road path	LBWF	Developer contributions	2015
Environmental improvements to Stirling Road path	LBWF	Developer contributions	2013
Environmental improvements to Higham Hill Recreation Ground	LBWF	Developer contributions	2014
<b>Education</b>			
New secondary School at Site BHL2 South	LBWF	Council budget	2015
New education use at Site BHL3	LBWF	Developer contributions, public funding	2017
New exhibition space at the Marine ENgine House	Walthamstow Wetlands Partnership	Heritage Lottery Fund and Partner Funding	2014-2016
<b>Health</b>			
New health care facilities at Station Hub or Sutherland Road	LBWF	To be provided as part of development of one of opportunity sites	2013-2018
<b>Climate change</b>			
Decentralised Energy Network	LBWF, Landowner	Developer contributions, LBWF, London Energy Efficiency Fund, s106 or CIL	2014-2026
Flood mitigation	Landowner, Environment Agency, LBWF	To be provided as part of development sites	Ongoing
<b>Employment</b>			

Infrastructure item	Responsible organisation	Funding sources	Target timescale
Improved signage at industrial estates	LBWF	Outer London Fund	2013-2015
<b>Other</b>			
New creche and community space at Site BHL7	Landowner	To be provided as part of development of BHL7	2014-2016

## 5.3 Indicative Development Targets

**5.3.1** 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 which 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.

**5.3.2** It must be stressed that that these figures are indicative 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.

## Blackhorse Lane AAP Incorporating Modifications

Site no.	Site name	Resi. units	Empl. fspce (m2)	Retail fspce (m2)	Other	Timeframe
BHL1(a)	Station Hub and Waterfront - part a	484	1300	1080	519 rooms of student accommodation	2014-2017
BHL1(b)	Station Hub and Waterfront - part b	311	2020	190	Additional cafe element	2016-2019
BHL1(c)	Station Hub and Waterfront - part c	180	0	0		2018-2022
BHL1(d)	Station Hub and Waterfront - part d	130	1200	0		2018-2022
BHL1(e)	Station Hub and Waterfront - part e	40	0	1000		2014-2017
BHL1	Station Hub and Waterfront (Entire Site)	1145	4520	2270		2014-2022
BHL2 North	Car Wash Site	50	1300	200		2020-2026
BHL2 South	Blackhorse Road/ Hawarden Road	0	0	0	Proposed site for new secondary school	2015
BHL3	Willowfields School, Tavistock Avenue	0	0	0	Proposed site for new education use	2017
BHL4 North(a)	Sutherland Road North - part a	65	0	0		2014-2016

## Blackhorse Lane AAP Incorporating Modifications

Site no.	Site name	Resi. units	Empl. fspce (m2)	Retail fspce (m2)	Other	Timeframe
BHL4 North(b)	Sutherland Road North - part b	10	450	300		2015-2017
BHL4 North(c)	Sutherland Road North - part c	-	-	-	Retain existing building and use	N/A
BHL4 North(d)	Sutherland Road North - part d	0	1000	0		2014
BHL4 North(e)	Sutherland Road North - part e	0	1400	0		2016-2018
BHL4 North(f)	Sutherland Road North - part f	43	0	0		2014-2015
BHL4 North(g)	Sutherland Road North - part g	40	0	0		Completed
BHL4 North	Sutherland Road North (Entire Site)	158	2850	300		2013-2018
BHL4 South(a)	Sutherland Road South - part a	110	300	140		2014-2017
BHL4 South(b)	Sutherland Road South - part b	50	1100	0		2016-2019
BHL4 South (c)	Sutherland Road South - part c	20	290	0		2016-2019



## Blackhorse Lane AAP Incorporating Modifications

Site no.	Site name	Resi. units	Empl. fspce (m2)	Retail fspce (m2)	Other	Timeframe
BHL4 South (d)	Sutherland Road South - part d	20	250	0		2016-2018
BHL4 South	Sutherland Road South (Entire Site)	200	1940	140		2014-2019
BHL5	Papermill Place	320	0	0		Completed
BHL6	Webb's Industrial Estate	235	780	1100	Part of retail may be used as health facility	2014-2017
BHL7	Billet Works	349	874	792	Approximately 444m2 D1 space	2014-2017
BHL8	152/154 Blackhorse Road	40	650	0		2018-2022
BHL9	Former Essex Arms Public House	15	0	430		Completed
BHL10	Marine Engine House	0	0	258	Proposed site for visitor centre including ancillary cafe and flexible exhibition/ retail space	2014-2016
BHL11	Old Coppermill	0	0	0	Proposed partial use for community/ visitors. Small scale office space for	2014-2016

## Blackhorse Lane AAP Incorporating Modifications

Site no.	Site name	Resi. units	Empl. fspce (m2)	Retail fspce (m2)	Other	Timeframe
					Wetlands project	
<b>Totals</b>		2512	12914	5490		

# Monitoring

## 6 Monitoring

### 6.1 Introduction

**6.1.1** Following a Plan-Monitor-Manage approach, the Council will have an effective monitoring framework in place to measure the effectiveness and delivery of the Blackhorse Lane Area Action Plan. This will include identifying any unintended and unforeseen consequences. We will explain why any objectives, policies and targets are not being met/delivered and where feasible will recommend action to rectify the situation. We will publish this work in an Annual Monitoring Report (AMR) on the Council's website every year for public scrutiny.

**6.1.2** Recent changes to the requirements for monitoring under the Localism Act have further allowed local authorities to shape how they use this valuable tool. It is a matter for each Council to decide what to include in their monitoring reports while ensuring that they are prepared in accordance with relevant UK and EU legislation. Councils are now responsible for their own performance management and are accountable to the public.

**6.1.3** Statutorily, under Section 35 of the Planning and Compulsory Purchase Act 2004, each year the Council must produce an Annual Monitoring Report to assess the implementation of the Local Plan and the extent to which policies in Local Development Documents are being achieved. Under Regulation 34 of the Town and Country Planning (Local Planning)(England) Regulations 2012, the AMR must contain the following:

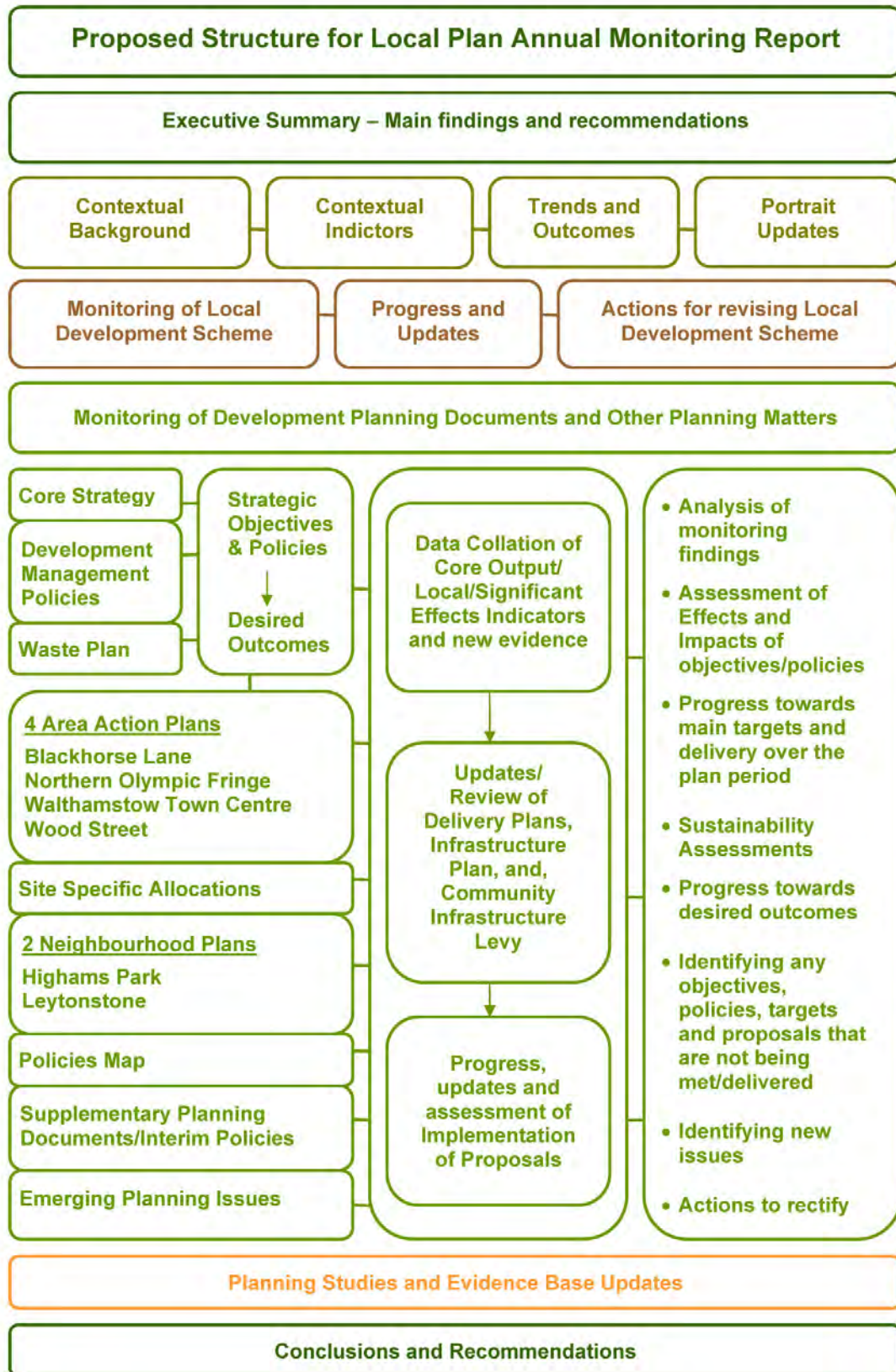
- the title and timetable of the local plans or supplementary planning documents in Waltham Forest's Local Development Scheme;
- the stage of plan preparation, reasons for any plan preparation behind the timetable, a statement of adoption/approval of any plans;
- identify any unimplemented policies with reasons in a statement and steps to take to secure implementation of the unimplemented policies
- annual numbers regarding net additional dwellings or net additional affordable housing;
- details of neighbourhood development orders and neighbourhood plans;
- information on the Community Infrastructure Levy under Regulation 62 of the Community Infrastructure Levy Regulations 2010;
- details of any joint action taken with other local planning authorities;
- provide any up-to-date information for monitoring purposes.

**6.1.4** While the Annual Monitoring Report is the principal tool for monitoring all Development Plan Documents, strategies and policies are also informed or monitored by other management/monitoring tools such as the borough's performance systems and various studies and surveys.

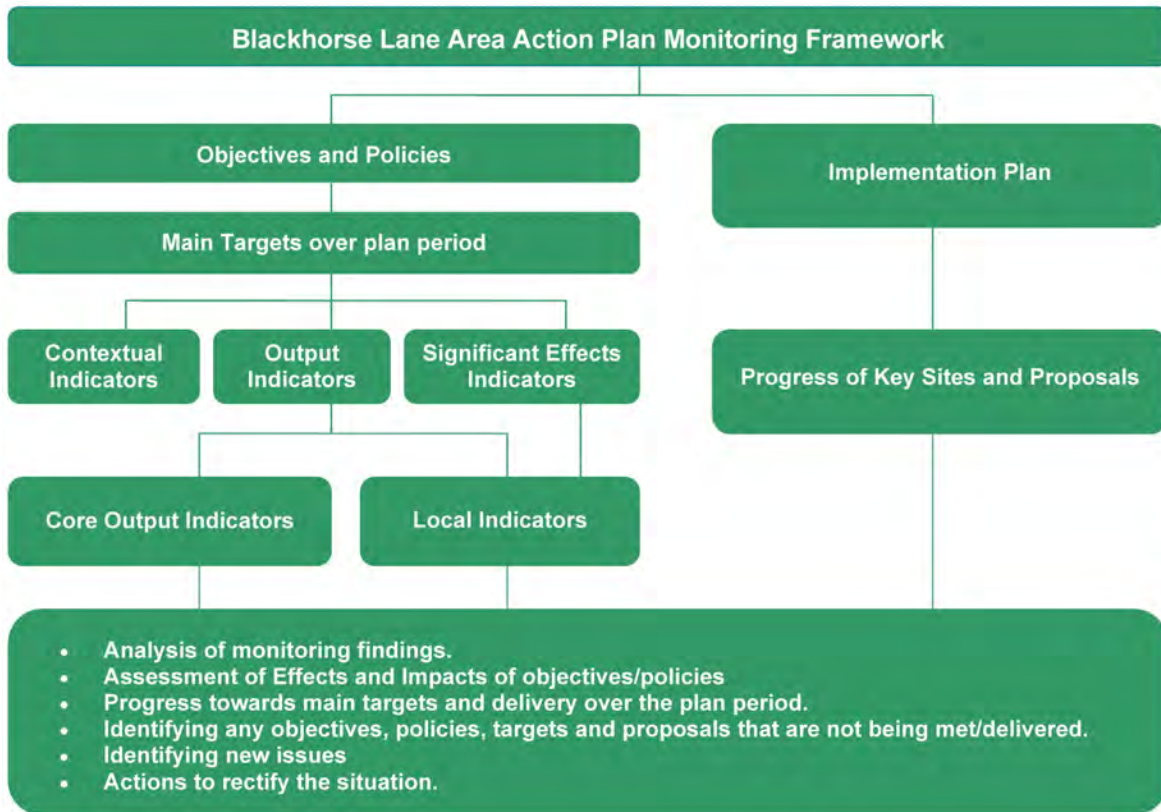
**6.1.5** Where necessary, new indicators will be created and obsolete ones will be deleted to meet changing circumstances. Reasons for changes include:

- lack of data has made some indicators unmeasurable;
- consultation responses suggested different indicators;
- changes to national policies, the Sustainable Community Strategy and Council's priorities;
- some indicators are no longer in the Council's performance dashboards;
- new studies/sustainability appraisals suggested better targets and indicators.
- The diagram below outlines the proposed structure for our AMR.





**6.1.6** Alongside other elements of the Local Plan, the effectiveness of the AAP in meeting its objectives, and progress on the delivery of key sites and infrastructure, will be reported in the AMR. The monitoring framework for doing so is set out in the diagram below:



**6.1.7** The successful implementation of the AAP, particularly in terms of individual sites and infrastructure projects, relies on the work of a number of parties. Whilst it is important to report progress on these in the AMR, the objectives of this document form the key policy direction and are therefore the main focus for monitoring; as set out in the table below. As monitoring work is resource intensive and time-consuming, targets and indicators have been drawn from the Core Strategy where possible. However, due to the nature of the document, additional indicators have also been included.

## 6.2 Monitoring Framework

Objective	Policy	Target	Indicator
1. To ensure Blackhorse Lane has a clear neighbourhood centre, which provides a range of shops and services to meet the needs of local residents and businesses, and encourages passers by to spend more time in the area.	7, 14	<p>Development of approximately 2300m<sup>2</sup> of net retail and/ or D class floorspace within the neighbourhood centre</p> <p>No single retail unit to have a net floor area of 1000m<sup>2</sup> or above</p> <p>No growth in A5 units or A2 units to be permitted</p>	<p>Local indicator - total amount of retail and D uses floorspace in neighbourhood centre</p> <p>L14 – development over 1000m<sup>2</sup> in town centres</p> <p>L17 – uses/ vacancy level in designated centres</p>
2. To provide a range of high quality homes that attracts families and the young and upwardly mobile to live in the area, as part of a mixed and balanced community that also caters for local housing need.	2, 3, 4, 5	<p>Over 2500 new homes to be built on brownfield land</p> <p>Higher density developments are concentrated in most accessible locations</p> <p>Improved results of Building for life assessments undertaken for schemes of 10 units or above</p> <p>Increased supply of housing units with 3 bedrooms or more, in line with the adopted Housing Strategy</p> <p>50% of new homes built in the area are affordable</p>	<p>H1 – plan period and housing targets</p> <p>H3 – new dwellings built on previously developed land</p> <p>L8 – housing density</p> <p>H6 – housing quality – buildings for Life</p> <p>L10 – housing development by unit type</p> <p>L9 (i) &amp; (ii) – affordable housing by type and tenure</p>

Objective	Policy	Target	Indicator
3. To ensure existing and new residents and workers in the area have better access to a range of open spaces, including Walthamstow Wetlands, Lee Valley Regional Park, and the Olympic Park.	9, 10	Reduction in areas (ha) deficient in access to nature	Local indicator - access to nature
		Reduction in areas (ha) deficient in access to open space	Local indicator - access to open space
		Improved public access to Walthamstow Wetlands	Local indicator – visitor numbers to Walthamstow Wetlands
		No negative changes in areas of biodiversity importance	E2 – change in areas of biodiversity importance
		Increase in hectares of new open space created	Local indicator – new open spaces
		Increase space for children and young people	Local indicator – provision for children and young people (e.g. playgrounds)
		Enhanced accessibility to the Olympic Park	Local indicator – delivery of new pedestrian/ cycle link through Walthamstow Wetlands/ Lee Valley Regional Park
4. To enhance the image of Blackhorse Lane by ensuring all new developments in the area (including both buildings and public realm) are designed to a high standard and fit for	8, 9, 10	100% of major applications to include an urban design statement.	L32 – Submission of design statements
		Improved results of Building for life assessments undertaken for schemes of 10 units and above.	H6 - Housing quality - building for life assessments  Local indicator – number of buildings of merit retained and incorporated into new development

Objective	Policy	Target	Indicator
purpose, and interact sensitively with their surroundings, especially blue/ green spaces.		Identified buildings of merit are retained and incorporated into development	
5. To ensure Blackhorse Lane continues to provide a range of jobs for our residents, and support the retention and growth of creative industries in the area.	6	Provision of 10,000m2 of quality new B1 employment space  Increase in businesses registered in the area  Retention of creative businesses in the area	BD1 – new employment floorspace  NI172 – New business registration rate  L1 – Loss of employment land
6. To ensure new developments incorporate the highest levels of sustainable design and their impact on climate change is minimised.	9, 11, 13	Increase in number of installed district heating systems  No increase in flood risk in the borough through appropriate design and siting of development and SuDs	Local indicator – number of district heating schemes installed  E1 – Planning applications for development on areas of flood risk; number refused, number permitted
7. To facilitate a modal shift away from private car use and towards walking, cycling and public transport for trips within the area and beyond; through a range of measures and incentives including physical enhancements to the Standard Junction.	3, 7, 10, 12	Proportion of walking increased to 34% in 2013/14 and to 37% by 2025/26  Proportion of travel by cycling increased to 2 % by 2014 and 6% by 2021  Delivery of improved pedestrian crossings at the Standard Junction  Increase in number of car free developments	Local indicator – the proportion of travel made by walking  Local indicator – the proportion of travel made by cycling  Local indicator – implementation of reconfigured Standard Junction  L23 – car free development



Objective	Policy	Target	Indicator
<p>8. To enhance or provide a range of new facilities including social spaces, to meet the needs of existing and new residents and businesses, in order to strengthen 'community spirit'.</p>	<p>7, 14</p>	<p>Delivery of 1 new secondary school and 1 new primary school</p>	<p>L20 – approvals for communities facilities (D1)</p>
		<p>Delivery of new GP and dentists surgery</p>	<p>L22 – floorspace for health services</p>
		<p>Protection of existing social infrastructure</p>	<p>Local indicator – loss of D1 floorspace</p>
		<p>Development of a new neighbourhood centre incorporating social spaces</p>	<p>L17 – uses/ vacancy level in designated centres</p>

## Appendix 1 - Evidence Base for AAP

Document	Produced by	Publication date
<b>General</b>		
The London Plan: Spatial Development Strategy for Greater London	Mayor of London	July 2011
Upper Lee Valley Opportunity Area Planning Framework	Mayor of London	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	London Borough of Waltham Forest	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	Macreanor Lavington Architects	2011
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

Document	Produced by	Publication date
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
<b>Housing</b>		
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	2010
Waltham Forest Housing Strategy	London Borough of Waltham Forest	2008
<b>Employment</b>		
London Borough of Waltham Forest 2009 Employment Land Study	URS	Oct 2009
London Borough of Waltham Forest – Local Economic Assessment	Navigant Consulting	Dec 2010
How to Promote and Support Businesses in the Current Climate	Fordham Consulting	2012
Land for Industry and Transport SPG	Mayor of London	2012

Document	Produced by	Publication date
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
<b>Retail</b>		
Waltham Forest Retail and Leisure Study	Nathaniel Lichfield and Partners	2009
Waltham Forest Hot Food Takeaways SPD	London Borough of Waltham Forest	March 2009
Healthy Weight Healthy Lives: A Cross Government Strategy for England	HM Government	2008
Waltham Forest Annual Monitoring Report 12/13	London Borough of Waltham Forest	Dec 2013
Use Class Order 2013	CLG	Jan 2013
<b>Design and Character</b>		
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
<b>Open Space and Nature Conservation</b>		
Lee Valley Park: Park Development Framework: Thematic Proposals	Lee Valley Park	Jan 2011
Upper Lee Valley Landscape Strategy	Witherford Watson Mann	2010

Document	Produced by	Publication date
Walthamstow Reservoirs Feasibility Study	Chris Blandford Associates	April 2010
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
Walthamstow Wetlands Stage C Report	KLA Design Team	Nov 2013
Walthamstow Wetlands Stage C Report - Amendments	KLA Design Team	Nov 2013
<b>Flooding</b>		
London Borough of Waltham Forest Level 2 Strategic Flood Risk Assessment	Scott Wilson	May 2011
<b>Transport</b>		
Creating Growth, Cutting Carbon: Making Local Transport Happen	Department for Transport	2011
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
<b>Climate Change</b>		
London Borough of Waltham Forest: Heat Mapping Study	Parsons Brinckerhoff	Feb 2011
Waltham Forest Decentralised Energy Network: Waltham Forest Satellite Schemes	Parsons Brinckerhoff	2012
Upper Lee Valley Decentralised Energy Network - Pre Feasibility Study	Parsons Brinckerhoff	2011



Document	Produced by	Publication date
Upper Lee Valley Decentralised Energy Network - Feasibility Study	Parsons Brinckerhoff	2012
<b>Infrastructure</b>		
Waltham Forest Strategic Infrastructure Plan: Social Infrastructure Needs Assessment	URS	2009
School Placement Requirement Projections	London Borough of Waltham Forest	Jan 2014
Community Infrastructure Levy (CIL) Draft Charging Schedule	London Borough of Waltham Forest	Sept 2013
Blackhorse Road/ Hawarden Road Planning Brief	London Borough of Waltham Forest	May 2009

## Appendix 2 - Glossary

**Disclaimer:**

*The Glossary is neither a statement of law nor an interpretation of the law, and is only an introductory guide to planning issues. It should not be used as a source for statutory definitions or interpreted as legal advice.*

- **Active frontage** - A frontage that can engage the general public, for example, a shop's public display area.
- **Affordable housing** - Housing provided at a cost considered affordable in relation to incomes that are average or below average, or in relation to the price of general market housing. Social rented housing includes housing rented from the Council and or registered social landlords (RSL). The rents on these properties are significantly lower than market housing rents. Intermediate housing aims to bridge the gap between social rented housing and market housing. Intermediate housing costs more than social rented housing but should still cost much lower than market housing. Affordable rent is housing provided at up to 80% of the market value. However, the Council produced guidelines for affordable rent in the borough in May 2011 which state that rents for affordable housing should be as follows:
  - 1 bed - up to 80 % market rent
  - 2 bed - up to 70% market rent
  - 3 bed - up to 60% market rent
  - 4 bed - up to 50% market rent.
- **Archaeological Priority Zone** – Areas of identified archaeological interest within the borough.
- **Area Action Plan (AAP)** - A Development Plan Document that will be used to provide a planning framework for areas where changes are envisaged. Forms part of the Council's Local Plan.
- **Artisan workshops** – Business space for use by skilled manual workers or craftspeople.
- **Biodiversity** - The diversity of life on earth which includes plants, animals, micro-organisms and bacteria.
- **Borough Employment Area** - Land meriting protection for employment generating uses.

- **Building for life** - The national standard for well designed homes and neighbourhoods. Schemes are judged against 20 criteria.
- **Buildings of merit** – Buildings that have been identified to have some architectural merit in the Urban Design Framework.
- **Building Schools for the Future (BSF)** - The previous Government's investment programme in secondary school buildings.
- **Car clubs** - Clubs where a number of people share a pool car(s) for rent or otherwise for personal use.
- **Central Activity Zone** – Area of London recognised to be of strategic importance in terms of finance, specialist retail, tourist and cultural uses and activities.
- **Community Infrastructure Levy (CIL)** - A charge on new developments used to finance the provision of infrastructure.
- **Conservation area** - An area of special architectural or historic interest where it is desirable to preserve or enhance the character or appearance.
- **Controlled Parking Zones** - Areas in which on-street parking is managed, usually through a permit system, typically where demands for limited space from residents, commuters, shoppers and others are in conflict.
- **Core Strategy** - A key Development Plan Document which sets out a long term spatial vision through strategic policies. Forms part of the Council's Local Plan.
- **Corridor scheme** – Transport improvement project expected to facilitate the delivery of local safety schemes and bus priority measures, address London Cycle Network gaps, as well as to deliver other local cycling and walking related improvements and bus stop accessibility measures along discrete highway corridors. Usually funded by TfL.
- **Creative industries** - Industries which have their origin in individual creativity, skill and talent and which have a potential for wealth and job creation through the generation and exploitation of intellectual property.
- **Culvert** - A channel or pipe that carries water below the level of the ground.
- **Developer contribution** - Also known as planning obligations (see definition below).

- **Development Management Policies** - A set of criteria-based policies in accordance with the Core Strategy, against which planning applications for the development and use of land and buildings will be considered. Forms part of the Council's Local Plan.
- **Designing out crime** – Concept of using the design and layout of buildings to minimise opportunistic criminal activity.
- **Development Plan** - Policies used to determine planning applications. Includes the Development Plan Documents that form the Local Plan (i.e. Core Strategy, Development Management Policies, Site Specific Allocations, and Area Action Plans), and the Mayor's London Plan. Any saved policies from the Unitary Development Plan that have not been replaced by the Waltham Forest Local Plan also form part of the Development Plan.
- **District centre** - Mixed use urban centres where provision is made for uses such as offices, commercial, cultural, health, housing and community facilities.
- **District heating system** - A system for using heat generated in a centralised location to meet nearby residential and commercial heating requirements.
- **Edge of centre** – An area outside of, but well connected, and within walking distance of a designated town centre or primary shopping area.
- **Equalities Impact Assessment (EQIA)** – A process designed to ensure that a policy, project or scheme does not discriminate against any disadvantaged or vulnerable people.
- **Flood resilient** - Measures that minimise water ingress and promotes fast drying to reduce any permanent damage.
- **Flood resistant** - Measures to prevent flood water entering a building or damaging its fabric.
- **Flood zones** - Shows the probability of flooding, ignoring the presence of existing defences.
- **Forms of entry** - Number of classes in an academic year; e.g. a school with 3 forms of entry means 3 classes per year group.
- **Green Belt (Metropolitan)** - An area of countryside or land that is protected from inappropriate development in order to prevent the sprawl of existing built-up areas and to protect the openness of the countryside. Green Belts are not

designated for their beauty or character, although there are many areas of high landscape quality within the Green Belt. The Metropolitan Green Belt is the protected open space that surrounds Greater London.

- **Green industries** – The business sector that produces goods or services, which compared to other, generally more commonly used goods and services, are less harmful to the environment.
- **Greenfield run-off rates** - The surface water runoff regime from a site before development.
- **Groundwater flooding** - Occurs when water levels in the ground rise above surface levels. It is most likely to occur in areas underlain by permeable rocks, called aquifers.
- **Habitats Regulation Assessment (HRA)** – An assessment used to ensure policies or projects do not cause adverse effects on the integrity of Natura 2000 sites (i.e. Special Areas of Conservation, Special Protection Areas, or Ramsar Sites).
- **Intermediate products** – Type of housing available for those who are not able to buy on the open market, but who can afford more than Housing Association rents.
- **Interim Planning Policy Framework (IPPF)** - A non-statutory planning framework used to encourage regeneration of an area in advance of the Local Plan. Whilst not part of the development plan, it has in the past been used as a material consideration in determination of planning applications.
- **Key growth area** - Areas of the borough that will be the primary focus of new development and regeneration.
- **Lee Valley Regional Park** - Area of open space covering 26 miles along the banks of the River Lea, providing sports and leisure venues, heritage sites, gardens, nature reserves and riverside trails.
- **Linear park** - An area of greenspace offering amenity value and providing links to open space.
- **Living roof** - A self-regenerating, cladding or roofing system using natural materials and planting. May also be referred to as green or brown roofs.



- **Local labour agreements** – A commitment from employers or developer to recruit local residents.
- **Local list** – List of buildings that the Council considers to be of heritage value for their architectural or historic interest.
- **Local Plan** - Folder of planning policy documents setting out the Council's aspirations for the future development of Waltham Forest.
- **Local retail parade** – Clusters of retail and town centre uses located along road corridors, typically accommodating small shops (under 200 sq m), that serve immediate local needs and provide primarily convenience goods.
- **London Plan** - The Mayor of London is responsible for producing a planning strategy for the capital. This replaces the previous strategic planning guidance for London (known as RPG3), issued by the Secretary of State. The London Plan is the name given to the Mayor's spatial development strategy.
- **Material consideration** - A matter that should be taken into account in deciding a planning application or on an appeal against a planning decision.
- **National Planning Policy Framework** – Government's national planning policy, which Local Plans should be in conformity with. Supersedes Planning Policy Statements.
- **Neighbourhood centre** - Urban centres smaller than a district centre, which provide for local convenience shopping and community facilities for local residents within easy walking distance of their homes.
- **Outer London Fund** – Package of investment funded by the GLA which aims to boost local high streets, deliver growth, new jobs and improve lives in Outer London.
- **Planning and design brief** - Document providing guidance on appropriate uses and design considerations for specific sites earmarked for development.
- **Planning obligations** - Requirements made of a developer to make planning permission acceptable. This could include matters such as the provision of affordable housing as part of the scheme, or a financial contribution towards off site works such as highway improvements.
- **Public realm** - The space between and within buildings that are publicly accessible including streets, squares, forecourts, parks and open spaces.

- **Public Transport Accessibility Levels (PTALs)** - A measure of the extent and ease of access to the public transport network. They range from 6 (excellent) through to 1 (very poor).
- **Renewable energy** - Energy flows that occur naturally and repeatedly in the environment, for example from the wind, water flow, tides or the sun.
- **Section 106 agreement** - Legal agreements between a planning authority and a developer, or undertakings offered unilaterally by a developer, that ensure that certain extra works related to a development are undertaken.
- **Shared ownership** –An intermediate housing product that allows occupiers to part rent part buy
- **Site specific flood risk assessment** - A detailed assessment of flood risk that may be required in support of a planning application. As well as assessing risk, they should propose measures the development can take to minimise any risk; including SUDs, evacuation strategies etc.
- **Sites of Special Scientific Interest (SSSI)** – Land considered to be of special interest due to its flora, fauna, geological or geographical features under the Wildlife and Countryside Act 1981 (amended 1985).
- **Small and Medium Enterprise (SME)** - Business with more than 10 and less than 250 employees.
- **Social infrastructure** - A wide variety of services that are essential to the sustainability and wellbeing of a community. This includes educational facilities, health services, sports and leisure facilities, libraries, jobs brokerage centres, community space and faith facilities, meeting rooms, halls and public houses.
- **Special Protection Area (SPA)** - A site designated under the European Union Directive on the Conservation of Wild Birds.
- **Strategic Industrial Location (SIL)** - An industrial area identified in the London Plan as being of strategic importance for employment uses of a more industrial/ manufacturing nature than Borough Employment Areas.
- **Super Output Areas** - a geographical area designed for the collection and publication of small area statistics (i.e. smaller than ward boundaries).
- **Supplementary Planning Documents** - Planning documents that provide supplementary guidance to a 'parent' Local Plan document.
- **Surface water flooding** - Occurs when heavy rainfall overwhelms the drainage capacity of the local area.

- **Sustainability Appraisal** – An assessment of the social, environmental and economic effects of strategies and policies contained in development plans.
- **Sustainable Urban Drainage Systems (SUDs)** - A sequence of water management practices and facilities designed to drain surface water in a manner that will provide a more sustainable approach than the conventional practice of routing run-off through a pipe to a watercourse.
- **Strategic Flood Risk Assessment (SFRA)** – Strategic Assessment of flood risk in the borough, used to help inform land use designations to ensure future development minimises flood risk.
- **Transport Assessment** – An assessment that is prepared and submitted alongside planning applications for developments likely to have significant transport implications. Such assessments should illustrate: accessibility to the site by all modes; the likely modal split of journeys to and from the site; and proposed measures to improve access by public transport, walking and cycling
- **Travel plan** - A package of measures produced by employers to encourage staff to use alternatives to single-occupancy car-use.
- **Travel plan framework** - A framework providing heads of terms for individual travel plans in support of new developments.
- **Unitary Development Plan (UDP)** - An old-style development plan prepared by a metropolitan district and some unitary local authorities, which contains policies equivalent to those in both a structure plan and local plan.
- **Upper Lee Valley** - An area covering approximately 14 kilometres from the M25 in the north to the Lea Bridge in the south. It includes large expanses of open space and reservoirs, which are surrounded by housing and industrial land.
- **Urban Design Framework (UDF)** - An area-wide framework to support future regeneration plans, offering guidance to developers on the key design matters that new development proposals should consider. Replaces earlier guidance provided in the Interim Planning Policy Framework.
- **Urban heat island** - An effect where the average temperature of an urban area is higher than nearby rural areas.
- **Use Classes Order** - The Town and Country Planning (Use Classes) Order puts uses of land and buildings into various categories. Planning permission is not needed for changes of use within the same use class.

- **Visibility splays** - An area clear of obstruction a set distance back from the road edge and along the road, to allow drivers to see any traffic coming
- **Walthamstow Wetlands** - Reservoirs and surrounding open spaces nestled between the urban areas of Blackhorse Lane and Tottenham Hale. Forms part of the Lee Valley Regional Park.
- **Watercourse** - All rivers, streams, drainage ditches (i.e. ditches with outfalls and capacity to convey flow), drains, cuts, culverts and dykes that carry water.
- **Windfall sites** – Sites that may be suitable for development but have not been allocated as such in the Development Plan.

## Appendix 3 - Changes to Policy Map and Other Relevant Documents

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 employment areas, and environmental designations have already been established in our Core Strategy and Development Management Policies. As new open spaces are 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.

Designation in 2006 UDP Proposals Map	Proposed Changes
New road linking Sutherland Road to Blackhorse Lane	Removal of proposed route

New additions to Policy Map
Frontage of new neighbourhood retail parade as shown in figure 6
Update local retail parade frontage as shown in figure 8
All opportunity sites shown in figure 20 to be added to the policy map

### Supplementary Guidance

The Blackhorse Lane Urban Design Framework and Planning Briefs (2011) provide detailed design guidance supplementary to the AAP. To ensure consistency between the documents, this will require updating upon completion of the AAP.



### 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"> <li>• 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.</li> <li>• 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"> <li>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,</li> <li>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</li> <li>III. An access point at the southeast corner of High Maynard reservoir connecting through to the station hub at Blackhorse Road.</li> </ol> </li> <li>• Access improvements at the low rail bridge over Coppermill Lane to ensure sufficient height for</li> </ul>
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	<p>pedestrian and cyclists over Coppermill Lane.</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> </ul>
	<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.
	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
	Heritage assets and features such as the Mairne 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.
	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.
	Explore opportunities with the Walthamstow Wetlands Partnership to link new visitor facilities into proposed decentralised energy networks.
<b>3.A.3 Douglas Eyre</b>	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.
	Support ongoing improvements to outdoor sporting facilities and investment in all weather football pitches.

<p>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.</p>	<p>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.</p>	<p>Support ongoing club and community use of sports pitches and associated built facilities.</p>	<p>Support the enhancement of existing strong landscape character, maintaining the continuity of green links on the eastern side of the valley.</p>	<p>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.</p>
<p><b>3.A.4</b></p>	<p><b>Tottenham Marshes, Hale Wharf &amp; the Paddock</b> <i>Please note only a small part of Area 3.A.4 lies within Waltham</i></p> <p>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></p>			

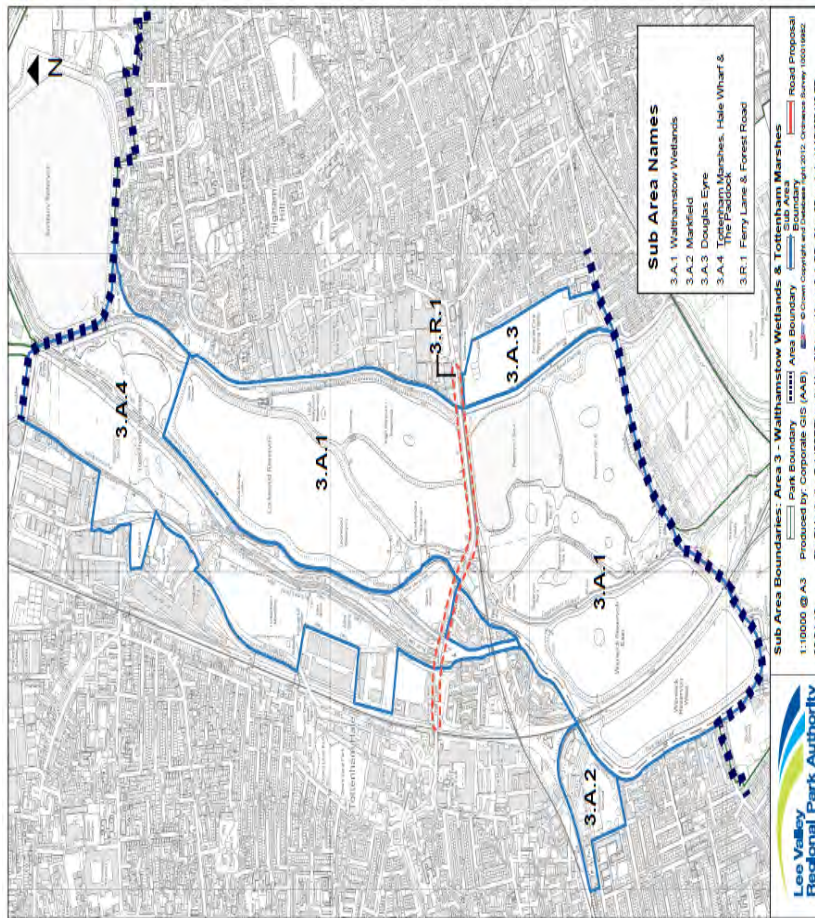
<p><b>Forest – the majority lies within the London Borough of Haringey. The full proposal is included here however as the Regional Park proposals cut across borough boundaries and require partnership working to secure delivery. Those relating only to Waltham Forest and the Blackhorse Lane AAP are indicated by a * and text written in italics</b></p>	<p>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*.</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"> <li>• New recreational or sporting facilities, based on the sites waterside location</li> <li>• Accommodation serving visitors to the Park</li> <li>• Waterside visitor facilities and facilities for clubs with a community emphasis, incorporating leisure uses for example café, cycle and canoe hire/club facilities.</li> </ul> <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>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.*</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. Opportunities to create a new controlled pedestrian bridge link as part of a nature trail, between The Paddock and Walthamstow Wetlands to be explored.*</p> <p>Clendish Marsh to be managed for events and local festivals with key stakeholders. Continue to explore and develop volunteer opportunities. Enhanced management of the East Hale Community Allotments to continue.</p> <p>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.*</p> <p>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*.</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>
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		<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><b>3.R.1</b></p>	<p><b>Ferry Lane &amp; Forest Road</b></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"> <li>• Reducing the impact of the road on the openness of the Park by             <ul style="list-style-type: none"> <li>- improving its public realm,</li> <li>- partially removing the wall on the southern side to open up views and</li> <li>- strengthening landscape belts</li> </ul> </li> <li>• Creation of a new pedestrian crossing to provide safe access into the main entrance for the Walthamstow Wetlands</li> <li>• 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</li> <li>• Improving bus services and provision including new bus stops/shelters close to Park entrances</li> <li>• Ensuring access from Blackhorse Road Station into the Park via Forest Road is clearly signed and promoted</li> <li>• Implementing a co-ordinated signage strategy for the road frontage including directional and entrance signage that reflects the range of facilities available.</li> </ul>



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
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"> <li>the creation of a naturalised edge to the River Lee Diversion providing opportunities for habitat creation and new recreational routes</li> <li>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</li> <li>Installation of a viewing platform to provide visual access across the reservoir and wider Park area</li> </ul> <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



	to include sailing and paddle boarding.
	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.
	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.
	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.
	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.
	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.
	The location and management of visitor access around Banbury Reservoir to take account of Thames Water operational requirements.
	Support Thames Water and the Environment Agency in work to maintain and improve water quality to enhance both ecological values and recreational amenity.

