

## Waltham Forest Local Plan Supporting Document



## Blackhorse Lane Area Action Plan Preferred Options Public Consultation Report

March 2013

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<p>يمكن توفير هذه الوثيقة أو ملخصها بلغات أخرى أو بالطبعة الكبيرة أو بلغة بريل أو على الشريط. ويمكن توفير خدمة ترجمة عند الطلب. وإذا احتجت منالا من هذه الخدمات الرجاء الاتصال معنا على العنوان المذكور أدناه.</p> <p style="text-align: right;">Arabic <input type="checkbox"/></p>	<p>यह पर्चा या इसका संक्षेप अन्य भाषाओं में, बड़े अक्षरों में या सुनने वाली टेप पर माँग कर लिया जा सकता है, और अन्य भाषाओं में अनुवाद की सुविधा भी मिल सकती है। यदि आपको इन सुविधाओं की जरूरत है तो कृपया निम्नलिखित पते पर हमारे साथ संपर्क करें।</p> <p style="text-align: right;">Hindi <input type="checkbox"/></p>
<p>অনুরোধক্রমে এই ডকুমেন্ট অথবা এর সারসর্ম অন্যান্য ভাষায়, বড় ছাপার অক্ষরে, ব্রেইল বা অক্ষলিপিতে, অডিও টেইপ বা বাজিয়ে শোনার কেসেটে অথবা অনুবাদ করে দেয়ার ব্যবস্থা করা যাবে। আপনার যদি এসব সেবাসমূহের প্রয়োজন হয়, তাহলে অনুগ্রহ করে আমাদের সাথে নীচের ঠিকানায় যোগাযোগ করুন।</p> <p style="text-align: right;">Bengali <input type="checkbox"/></p>	<p>ਇਹ ਪਰਚਾ ਜਾਂ ਇਹਦਾ ਖੁਲਾਸਾ ਹੋਰ ਭਾਸ਼ਾਵਾਂ ਵਿਚ, ਵੱਡੇ ਅੱਖਰਾਂ ਵਿਚ, ਜਾਂ ਸੁਣਨ ਵਾਲੀ ਟੇਪ 'ਤੇ ਮੰਗ ਕੇ ਲਿਆ ਜਾ ਸਕਦਾ ਹੈ, ਅਤੇ ਹੋਰ ਭਾਸ਼ਾਵਾਂ ਵਿਚ ਤਰਜਮਾ ਕਰਨ ਦੀ ਸਹੂਲਤ ਵੀ ਮਿਲ ਸਕਦੀ ਹੈ। ਜੇ ਇਹਨਾਂ ਸਹੂਲਤਾਂ ਦੀ ਤੁਹਾਨੂੰ ਲੋੜ ਹੈ, ਤਾਂ ਕਿਰਪਾ ਕਰਕੇ ਹੇਠ ਲਿਖੇ ਪਤੇ 'ਤੇ ਸਾਡੇ ਨਾਲ ਸੰਪਰਕ ਕਰੋ।</p> <p style="text-align: right;">Punjabi <input type="checkbox"/></p>
<p>我們可以按照您的要求向您提供此文件或其摘要的母語譯本、大字印刷版本、盲文版本、錄音帶或者提供其他翻譯服務。如果您需要以上服務，請通過以下的地址與我們取得聯繫。</p> <p style="text-align: right;">Chinese <input type="checkbox"/></p>	<p>Istekte bulunursanız, bu broşürü ya da broşürün özetinin Türkçesini size gönderebiliriz. Ayrıca broşürün iri harfli baskısı, görme engelliler için parmak ucuyla okunabilen Braille alfabesiyle yazılmış kabartma şekli ve ses kaseti de olup istek üzerine broşürün özetini sözlü olarak da size Türkçe okuyabiliriz. Bu hizmetlerden yararlanmak için aşağıda yazılı adresten bize ulaşabilirsiniz.</p> <p style="text-align: right;">Turkish <input type="checkbox"/></p>
<p>Ce document ainsi que son résumé sont disponibles dans d'autres langues, en gros caractères, en braille et sur support audio. Une version traduite peut également être obtenue sur demande. Pour obtenir l'un de ces services, veuillez nous contacter à l'adresse ci-dessous.</p> <p style="text-align: right;">French <input type="checkbox"/></p>	<p>یہ دستاویز یا اس کا خلاصہ دیگر زبانوں، بڑے حروف، یا آڈیو ٹیپ کی شکل میں دستیاب ہو سکتا ہے، یا درخواست کرنے پر ترجمے کی سروس دستیاب ہو سکتی ہے۔ اگر آپ ان سروسز تک رسائی حاصل کرنا چاہتے ہیں تو برائے مہربانی ہم سے نیچے دیئے گئے پتے پر رابطہ کیجئے۔</p> <p style="text-align: right;">Urdu <input type="checkbox"/></p>
<p>Name _____ Address _____ _____ _____ Telephone No _____</p>	<p><b>CONTACT:</b> Planning Policy Team Environment and Regeneration London Borough of Waltham Forest Sycamore House, Waltham Forest Town Hall Forest Road, Walthamstow, London, E17 4JF</p> <p>Telephone 020 8496 3000 Email: <a href="mailto:planning.policy@walthamforest.gov.uk">planning.policy@walthamforest.gov.uk</a> Web site: <a href="http://www.walthamforest.gov.uk">www.walthamforest.gov.uk</a></p>

## INTRODUCTION

During the consultation on the Blackhorse Lane Area Action Plan Preferred Options from 22 August to 30 September 2011, there were 206 responses received from 35 consultees.

This report is divided into two parts:

Part I – Written Comments and Council Officers' Response

Part II – Questionnaire Outcomes (starting on page 78)

## Part 1

### Blackhorse Lane Area Action Plan Preferred Options – Schedule of Written Comments and Council Officers’ Response

Name/Organisation of Consultee	Comment ID	Consultation Points	Comments From Consultee	Council Officers' response
Miss Rachael A Bust, Deputy Head of Planning and Local Authority Liaison The Coal Authority	bhlpo17	Chapter 01 - Introduction - Section 1.1 - What will the Area Action Plan do?	Thank you for consulting The Coal Authority on the above. Having reviewed your document, I confirm that we have no specific comments to make on this document at this stage. We look forward to receiving your emerging planning policy related documents; preferably in an electronic format. For your information, we can receive documents via our generic email address <a href="mailto:planningconsultation@coal.gov.uk">planningconsultation@coal.gov.uk</a> , on a CD/DVD, or a simple hyperlink which is emailed to our generic email address and links to the document on your website. Alternatively, please mark all paper consultation documents and correspondence for the attention of Planning and Local Authority Liaison. Should you require any assistance please contact a member of Planning and Local Authority Liaison at The Coal Authority on our direct line (01623 637 119).	Noted.
Mr Stephen Wilkinson, Head of Planning and Regeneration Lee Valley Regional Park Authority	bhlpo92	Chapter 01 - Introduction - Section 1.1 - What will the Area Action Plan do?	A significant area of the Regional Park lies within the Blackhorse Lane and as such the Area Action Plan will be a key influence on future use and development within the Park. The Lee Valley Regional Park Authority is a statutory authority created by the Lee Valley Regional Park Act 1966 (the Park Act). It has a statutory responsibility to either provide directly or work with partners to provide facilities for sport, recreation, leisure, entertainment and nature conservation throughout the Park. The Park starts in east London extending northwards from the River Thames to Ware in Hertfordshire and comprises 4,000ha of which 1,600ha are owned and managed by the Authority. It has a political membership comprised of councillors drawn from across London, Hertfordshire and Essex from both Riparian and Non-riparian authorities although the majority of our Members are drawn from the riparian boroughs. Although the Authority is not a planning authority it has a range of powers which relate to the statutory planning process. Section 14 of the Park Act enables the Authority to prepare proposal for the future management and development of the Regional Park. Riparian planning authorities are required to include these into their relevant planning strategies and policies although inclusion does not infer that the planning authority accepts these. For the purposes of the Park Act you are a riparian Authority. Further, sections 14 (subsections 4-7) of the Park Act requires local planning authorities to consult with the Authority on applications for planning permission which they consider could affect the Park. Section 14 (subsections 8-9) allows the Authority to refer the decisions of the riparian authorities to the Secretary of State if it is considered by the Authority that the decision taken materially conflicts with the proposals of the Authority for the development of the Park. The Authority will be considering the Area Action Plan at its meeting of the Lower Lee Valley Regeneration and Planning Committee on 10 th November 2011.	Noted
Mrs Claire McLean,	bhlpo18	Chapter 01 -	British Waterways does not own or manage any of the water within the identified	Noted. British Waterways will be

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Area Planner Canal & River Trust		Introduction - Section 1.1 - What will the Area Action Plan do?	Blackhorse Lane regeneration area, but we are responsible for the River Lee Navigation on the opposite side of the Reservoirs, which is an important link that forms part of the wider character area and is important for connectivity. British Waterways is pleased to see the AAP Preferred Options document adopt a general design principal of linking the area to the Blackhorse Lane area to the Lee Valley Park and beyond to the River Lee Navigation, particularly at Stonebridge Lock. We also have aspirations to improve the connectivity of cycle routes in the area with the towpath, which should be incorporated into the plans for regenerating the Blackhorse Lane area. We therefore request that we be involved in discussions on these issues as the proposals evolve.	contacted regarding the Walthamstow Wetlands project and the proposals for a new cycle/footpath shown in figure 13, as schemes progress.
Carmelle Bell, Thames Water Utilities Ltd	bhlp0102	Chapter 01 - Introduction - Section 1.2 - What has been done so far?	The importance of considering water and sewerage infrastructure provision in the emerging LDF Documents is highlighted by paragraph 4.9 of PPS12, which states that in preparing Local Development Documents: "LPAs should ensure that delivery of housing & other strategic and regional requirements is not compromised by unrealistic expectations about the future availability of infrastructure, transportation and resources. Annex B sets out further guidance on resources, utilities and infrastructure provision." Paragraphs B3 to B8 of PPS12 also place specific emphasis on the need to take account of infrastructure such as sewerage early on in preparing Local Development Documents. Paragraph B3 in particular states: "The provision of infrastructure is important in all major new developments. The capacity of existing infrastructure and the need for additional facilities should be taken into account in the preparation of all local development documents." It will be essential to ensure that the introduction of a portfolio of Local Development Documents (LDDs) does not prejudice adequate planning for water and sewerage infrastructure provision as this is an essential pre-requisite for development.	Noted. Whilst PPS12 has now been superseded by the NPPF, Policy DM35 of our Development Management Policies DPD (also part of our local plan) sets out our stance to water infrastructure, in accordance with national policy
Michael Polledri, Lee Valley Estates (Agent: Mr Jon Bradburn of Montagu Evans)	bhlp085	Chapter 01 - Introduction - Section 1.2 - What has been done so far?	As you will be aware, Lee Valley Estates is a significant landowner within LB Waltham Forest. They have made significant investment within the wider area and have worked hard to deliver physical and economic improvements for the community. With regard to the Blackhorse Road area, Lee Valley Estates own three major sites which are discussed within the AAP; Webb's Industrial Estate, Uplands Park and Sutherland Road (Unity Works). Our comments on the AAP relating to the regeneration of these sites and the delivery of high quality employment space and residential units for the community are set out below.	Noted
Giles Dolphin, Planning Decisions Unit Greater London Authority	bhlp0187	Chapter 01 - Introduction - Section 1.3 - Where are we now and where do we want to be?	The proposals in the AAP are in line with the draft Upper Lee Valley OAPF as it supports the delivery of growth in the Upper Lee Valley Opportunity Area.	Support welcomed
Giles Dolphin, Planning Decisions	bhlp0195	Chapter 01 - Introduction -	TfL welcomes the proposed intensification of the Blackhorse Lane area, particularly considering its role in delivering growth in the wider Upper Lee Valley	Noted. A reference to TfL's Strategic Transport study will be inserted as

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Unit Greater London Authority		Section 1.3 - Where are we now and where do we want to be?	Opportunity Area (OA). The document may benefit from referring to TfL's Strategic Transport Study which covers the whole of the OA, including the AAP area. The study will consider the impact that projected development and background growth will have on the public transport and highway networks. This will identify the critical issues and feasible solutions, and determine the scale of transport improvements including infrastructure that will be needed to support the proposed level of development across the OA. The results of this study, which is likely to be completed later in 2011, will therefore assist in prioritising developers' pooled contributions towards transport, which could be reinforced in the AAP.	evidence base, and its findings in the chapter on transport.
Katy Andrews	bhlp0152	Chapter 01 - Introduction - Section 1.4 - Where is included in the Area Action Plan?	The boundary is bizarre, especially to the north of Forest Road, and the section 1.4 explanation doesn't give reasons for this. Why is there a blip at the northern tip above Banbury Reservoir? Why not just include Folly Lane and use that as the boundary? Does it have to follow the LBWF border? I have no strong opinions on this; I just feel bemused	As set out in paragraph 1.4.2, the boundary for the Blackhorse Lane area was originally drawn up using data on deprivation. This means that the boundary has followed ward or super output area boundaries, due to the way data is collected by the Office for National Statistics.
Michael Leigh, Chair Blackhorse Action Group	bhlp0136	Chapter 01 - Introduction - Section 1.4 - Where is included in the Area Action Plan?	Should be extended to include St James along rail line linking to Coppermill, for reasons of future access and because the residents in these additional streets will be affected by proposals	The proposed extension of the boundary relates to residential streets that are not likely to be subject to major change or development pressure. As set out in the commentary provided in section 1.4 of the Preferred Options Paper, the proposed boundary for the AAP is well established and understood locally. It is noted that the proposed extension is in close proximity to the Walthamstow Wetlands. Regardless of inclusion in the AAP boundary, these residents will benefit from improved public access, and will be consulted on proposals for the Wetlands as the project progresses.
Nuria Rodriguez	bhlp0126	Chapter 01 - Introduction - Section 1.4 - Where is included in the Area Action Plan?	To extend the boundaries of the BHL AAP to incorporate the whole Coppermill street and all the streets between Coppermill Lane and the St James railway line eg Leucha Road, York Road, Chester Road etc. These streets are connected with the most Southern and at the moment one of the only two access to Walthamstow marshes.	The proposed extension of the boundary relates to residential streets that are not likely to be subject to major change or development pressure. As set out in the commentary provided in section 1.4 of the Preferred Options Paper,

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				<p>the proposed boundary for the AAP is well established and understood locally. It is noted that the proposed extension is in close proximity to the Walthamstow Wetlands.</p> <p>Regardless of inclusion in the AAP boundary, these residents will benefit from improved public access, and will be consulted on proposals for the Wetlands as the project progresses.</p>
Ortrun Peyn	bhlp0170	Chapter 01 - Introduction - Section 1.4 - Where is included in the Area Action Plan?	Boundary should include streets off Salop Road, as any changes to the marshes concern residents in those streets most	<p>The proposed extension of the boundary relates to residential streets that are not likely to be subject to major change or development pressure. As set out in the commentary provided in section 1.4 of the Preferred Options Paper, the proposed boundary for the AAP is well established and understood locally. It is noted that the proposed extension is in close proximity to the Walthamstow Wetlands.</p> <p>Regardless of inclusion in the AAP boundary, these residents will benefit from improved public access, and will be consulted on proposals for the Wetlands as the project progresses.</p>
Anthony Pharoah, Senior Planner Rapleys	bhlp071	Chapter 02 - Visions and Objectives - Section 2.1 - Vision	Our client generally supports the vision of the Council for the Blackhorse Lane AAP, specifically the long-term vision to support small-scale local business/commercial spaces and that residents and employers should have access to (commercial and employment) resources and opportunities locally, offering betterment and wealth generation.	Support welcomed
Katy Andrews	bhlp0153	Chapter 02 - Visions and Objectives - Section 2.1 - Vision	The range of housing must be of high quality design, in materials and of a height appropriate to and consistent with the general character of the built up area.	Noted. Vision to be added to in order to highlight the importance of integrating new developments and using them as an opportunity to enhance the image of the area.
Mark Hayes, Chief Executive Christian Action Housing	bhlp026	Chapter 02 - Visions and Objectives - Section 2.1 -	The vision should refer to the potential to provide landmark buildings that help define the area and give the built environment a unique identity	There is no absolute definition of what is meant by a "landmark" building although this is often assumed to be one that is tall or

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		Vision		<p>significantly taller than its surroundings. The Council has included a specific policy for tall buildings in its Core Strategy which sets out criteria for assessing both tall buildings (defined as ten storeys and above) and taller buildings (between 5-9 storeys) which also takes account of planning guidance on tall buildings prepared by CABE/English Heritage. The policy also states that appropriate sites for tall/taller buildings will be identified via the AAP process for each of the Council's growth areas: Blackhorse Lane, Walthamstow, Wood Street and the Northern Olympic Fringe. However, our approach to regeneration of the Blackhorse Lane area is one that seeks to incorporate the existing built fabric to characterise new developments. Whilst there may be potential for some higher density, taller "landmark" developments at gateway locations, this is not a key feature of our proposals, hence it is not specifically referred to in the vision.</p>
Michael Leigh, Chair Blackhorse Action Group	bhlp0137	Chapter 02 - Visions and Objectives - Section 2.1 - Vision	<p>1. All developments should aim to meet or even exceed the most ambitious environmental standards. This should be incorporated into the vision.` 2. "Betterments and wealth generation" are good, and priority should explicitly be given "for the local community" 3. New neighbourhoods should not just look like existing ones, but integrate with them too. 4. The "public realm framework" should prioritise the safety and protection of wildlife.</p>	<p>1. Reference to high environmental standards to be inserted to vision. 2. As betterment and wealth generation are linked in the vision to local opportunities and resources for residents and employees, its relevance to local communities is already considered explicit. 3. Additional reference to integration of new developments to be inserted into Proposed Submission. 4. References to the Lee Valley Park and accessibility for all in the vision is considered to demonstrate the importance of wildlife and safety to</p>



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Michael Polledri, Lee Valley Estates (Agent: Mr Jon Bradburn of Montagu Evans)	bhlp086	Chapter 02 - Visions and Objectives - Section 2.1 - Vision	We support the Council's vision for Blackhorse Road, and agree that the area should be redeveloped to promote a thriving and attractive place for both residents and businesses. We endorse the Council's alternative vision, which provides further detail on how this should be achieved, promoting the area for mixed-use development comprising a range of housing, interspersed with small-scale local business / commercial spaces. By increasing the quality of the environment and the opportunities available for existing and new members of the community, Blackhorse Road will become a desirable place to live and work. The eight objectives which the Council have set out on page 16 of the AAP as considered to be well thought out and, more importantly, their deliverability is achievable. Specifically, Objective 5 - A Place to do Business and for Creative Industries, is fully endorsed. The employment opportunities within the Blackhorse Road area are changing from low-skilled and low-job generating manufacturing and storage industries, to those such as the Creative Industry, who provide an increase in employment generation and training opportunities within high-quality flexible space. Lee Valley Estates' current application for Webb's Industrial Estate includes high quality, affordable business space for occupiers such as those within the Creative Industries, along with other opportunities for entry-level jobs within the community, and looks to cater for this change. What is important to note within these objectives, is that the Council's vision also sees this change occurring, and focuses its objective on maintaining and creating a range of jobs without specifically focussing on the retention of low-grade industrial land. Delivering the Council's eight objectives will only be possible if there is recognition that this land is appropriate for redevelopment. This should be clearly stated within the AAP.	the public realm framework. Support for vision and objectives welcomed. Whilst redevelopment of land is necessary to achieve our objectives, it is not considered necessary to make any clear statements to this effect. A clear steer towards redevelopment of sites is apparent through the designation of key sites. A blanket statement would undermine our intention to provide a mixed and balanced economy, which retains an element of traditional manufacturing jobs; particularly in land designated as SIL. As such it could in fact undermine objective 5; which makes clear the need to provide "a range of jobs for our residents".
Mr Ian Dubber, Workspace Group (Agent: Andrew Ransome of Ransome and Company Ltd)	bhlp055	Chapter 02 - Visions and Objectives - Section 2.1 - Vision	Workspace supports the vision for the Blackhorse AAP area and specifically where it states: "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".	Support welcomed
Mr Stephen Wilkinson, Head of Planning and Regeneration Lee Valley Regional Park Authority	bhlp093	Chapter 02 - Visions and Objectives - Section 2.1 - Vision	The Authority welcomes the revised AAP boundary. As recognised in the AAP, the Regional Park is a major resource and asset for the area. It is important that this is promoted, enhanced and protected by policies that will direct the regeneration of the area and secure new development. Reference to the Lee Valley Regional Park should be reinstated in the updated vision to fully reflect the Park's role and potential; the following amended text is proposed: ".....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" The Authority supports the objectives, in particular 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"	Support welcomed, and additional wording to vision accepted

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Nuria Rodriguez	bhlp0127	Chapter 02 - Visions and Objectives - Section 2.1 - Vision	To incorporate environmental sustainability in the vision for the AAP. To make environmental sustainability an essential and key aspect of the developments.	Agreed. A reference to be inserted to the vision to high levels of environmental sustainability in new build that helps enhance the image of the area.
Ortrun Peyn	bhlp0171	Chapter 02 - Visions and Objectives - Section 2.1 - Vision	Add to the vision that you aim for the highest possible environmental standards and that you will consult with local residents and resident's groups during every phase of this process.	Vision to be amended to refer to high environmental standards. Our procedures for consulting with residents our set out in our Statement of Community Involvement
Anthony Pharoah, Senior Planner Rapleys	bhlp072	Chapter 02 - Visions and Objectives - Section 2.2 - Objectives	A number of objectives are set for the AAP, of which, Objective 5 is relevant. Our client again supports the thrust of this policy, that is, to provide a range of jobs for local residents and support local industry, but suggests that 'Blackhorse Lane area' and should replace 'Blackhorse Lane'.	Support welcomed
Katy Andrews	bhlp0154	Chapter 02 - Visions and Objectives - Section 2.2 - Objectives	We need a post office and mailbox (both vanished when Mr Varya retired) at Blackhorse Lane crossroads. Biggest need is family homes with garden/ play space for young children - local schools are full beyond bursting point; why attract more young couples/ families who will be forced to move as their children grow up, adding to population'churn' (and reduced social cohesiveness and 'community spirit'). Very pleased to see interaction with 'blue and green spaces'.	As post offices fall within A1 of the use class, proposals for them will in principle be welcome within the new neighbourhood centre. We intend to provide for a mixed community, including families. Sites are also safeguarded for education use to help address capacity issues once funding gaps are resolved. Support for blue/ green spaces welcomed.
Mark Hayes, Chief Executive Christian Action Housing	bhlp027	Chapter 02 - Visions and Objectives - Section 2.2 - Objectives	The phrase 'mixed and balanced community' is not defined. Subsequent parts of the document appear to define it as meaning 'less affordable housing' than is currently being developed in part of the area. But you don't say what other type of housing you want and how it will be achieved. In practice, this well-intentioned objective will result in significant quantities of privately owned, investment led housing at high rents. Is this what you really want? The section on housing is very weak and not properly evidenced. Do you have evidence as to what is happening in the area at the moment, in terms of the use of 'non affordable' housing? how much of it is owner-occupied? how much of it is privately led? How much is owned by institutions? How much by small private landlords? This objective needs far more work.	The concept of mixed communities is well established through government policy first contained in Planning Policy Statement 3: Housing. 'Balanced' has been added to this due to our aspiration to seek an appropriate mix of social, intermediate, and private tenures across new developments, mindful of the mix created through recent permissions. Emerging evidence from the Borough's latest housing needs assessment will be used to inform revisions to housing chapter.
Michael Leigh, Chair Blackhorse Action Group	bhlp0138	Chapter 02 - Visions and Objectives -	1. Should be a focal point where people can interact and create a sense of community. As well as encouraging economic growth, local residents should be consulted. A cultural venue is essential and natural people-flow should be taken	1. Noted. Objective 8 refers to the importance of a sense of community. 2. The intention of this

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		Section 2.2 - Objectives	into account to avoid 'dead' spaces. 2. Cut "young" - why exclude elderly, single or couples? 3. Not just access to existing space, but creating new ones within neighbourhoods 4. It should create a real sense of place, and meeting the highest standards of environmental sustainability 5. Should also promote non industrial creative opportunities, e.g. a music venue, theatre, galleries etc 6. Make reference to technologies and materials 7. "Movement" should be understood as a "natural people flow" and bus/ cycle routes should complement and not damage these flows. Also see points on objectives 1 and 4. 8. Facilities should be understood as more than just shops, bars etc, and should include 'social spaces' where people will mingle safely.	objective was that the area can capitalise on its strengths of strong transport links and relative affordability (in London terms) to attract a young and upwardly mobile population that are priced out of other areas, as part of a mixed and inclusive community that also includes couples, families, and the elderly. Such a demographic could help support existing and new businesses, help create demand for more social facilities etc. Objective to be rephrased in Proposed Submission. 3. Objective 3 relates to both new and existing spaces, as is made clearer in Policy BHL8. Existing spaces are highlighted in this objective as improving access to these is a major underlying theme of our proposals 4. Sense of place is covered in objective 1, and environmental sustainability in objective 6. 5. Non employment opportunities are covered under objective 1, as shops and services that will help create a sense of place. 6. Use of appropriate technologies and materials is implied under the banner of sustainable design. 7. Noted. Specific mention is made of cycling and public transport flows and the priority of these ahead of the private car. 8. Noted. Objective to be amended to clarify that this includes 'social spaces'
Mr Ian Dubber, Workspace Group (Agent: Andrew Ransome of Ransome and Company Ltd)	bhlp056	Chapter 02 - Visions and Objectives - Section 2.2 - Objectives	Workspace supports the proposed objectives and specifically: Objective 2 'A Place to Live', which seeks to provide a range of high quality homes that attracts young single people and families to live in the area, as part of a mixed and balanced community that also caters for local housing need. Objective 5 'A Place to do Business and for Creative Industries', which seeks 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.	Support welcomed

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Mr Sam Parry	bhlp01	Chapter 02 - Visions and Objectives - Section 2.2 - Objectives	If there is a desire to make this " A Place to do Business and for Creative Industries", I think there should be an aim to make this area a destination . For creative businesses to thrive, they will need to be supported by customers visiting the area. I believe there should be an aim to attract restaurants, bars and cafes to the area to support other creative industries. Coupled with improved access to the reservoirs, this could make this a really thriving area.	Noted. The notion of making the area a 'destination' is key to our proposals, hence the explanatory text under objective 1 'a neighbourhood centre' - under which we will encourage 'passers by to spend more time in the area.' Objectives 3 and 4 are also relevant; in terms of improving the attractiveness of the area as a destination.
Ms Candice Beard, Planning Liaison Officer Environment Agency	bhlp077	Chapter 02 - Visions and Objectives - Section 2.2 - Objectives	Objective 3 - A Green Place It is important to improve access to open spaces within the Blackhorse Lane area for local people to enjoy them. However, within this objective there should also be an aim for new open spaces to be created and existing open spaces enhanced. Objective 4 - A Well Designed Place We ask that this Objective is reworded to read, and interact sensitively with their surroundings, especially blue/green spaces.' Objective 6 - A Sustainable Place We support this Objective.	Objective 3 does not preclude the creation of new open spaces, and by referring to spaces such as Walthamstow Wetlands, the inference is that access to existing spaces will be improved. This is addressed more explicitly in chapter 3.6 of the Preferred Options Paper: Public Open Space and Nature Conservation. Suggested alterations to objective 4 accepted. Support for objective 6 welcomed
Ortrun Peyn	bhlp0172	Chapter 02 - Visions and Objectives - Section 2.2 - Objectives	1. What do you mean by "neighbourhood centre"? Series of blocks is not a centre! A performance place (theatre/ music) is essential as this attracts people to the area and encourage social interaction. 3. You need to create better access to existing space and create new green spaces among the new buildings. 8. Again, I want a theatre/ music performance place included in "a community place" - not just shops and cafes	1. A neighbourhood centre is not intended to be a series of blocks, but instead a hub of activity that provides a range of shops and services for the local community. 3. Creating better access to existing spaces such as the Wetlands is a key theme of our proposals. 8. Policy BHL6 aims to encourage a range of town centre uses to the neighbourhood centre, to help foster a sense of community
Katy Andrews	bhlp0155	Chapter 03 - Key Policy Areas - Policy BHL01: Housing growth	How about some condominium type housing for single person households, sharing eating and cooking facilities - cheaper bills and less energy use all year round, less wasted space, very green, has anyone ever suggested it?	We recognise that in accordance with the London Plan, shared housing (HMOs) can help meet housing need, and contribute to mixed and inclusive communities. However, design quality would be very important, and a high concentration of such uses can

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				place pressure on infrastructure and services. Our town centres are considered to be the most appropriate location for such uses.
M Kahn	bhlp0210	Chapter 03 - Key Policy Areas - Policy BHL01: Housing growth	More housing needed	The AAP aims to set out appropriate sites for residential development, but also seeks to set out a framework form providing an appropriate mix of land uses in the interests of achieving a sustainable pattern of development
Michael Leigh, Chair Blackhorse Action Group	bhlp0140	Chapter 03 - Key Policy Areas - Policy BHL01: Housing growth	A. We don't want a ghetto there. Such a community is transient, unsustainable, and is unlikely to blend with existing communities. B. The tube and buses are already horrifically congested, and creating a high density of people seeking access all at the same time would be madness. Also, why not equalise density across the development? It is not clear that high density buildings would fit with objective 4. C. Subject to high quality design of affordable housing, and no excessive density. D. Confusing question - generous room sizes should be true of all homes, not just 1 and 2 bed properties	A. A range of house sizes will be sought on all proposals in the interests of creating mixed and balanced communities, as set out in policy BHL3. A skew towards more smaller units for young professionals should not be interpreted as 100% - further details will be provided in the Proposed Submission. 1 and 2 bed units. B. Equalising densities across all developments is likely to result in an a higher proportion of households reliant on the private car, leading to increased road traffic and increased carbon emissions. C. Noted. D. Our Development Management Policies DPD sets out minimum space standards for all new residential developments. We have drawn particular attention to 1 and 2 bed properties to avoid a high concentration of small such units at high densities; which is considered poor design and not consistent with our aspirations for mixed and inclusive communities.
Ortrun Peyn	bhlp0173	Chapter 03 - Key Policy Areas - Policy BHL01:	B. The Victoria line is already full to capacity (I am a daily user Blackhorse Road to Green Park)	The Victoria Line will have approximately 20% increase in capacity by the end of 2013 part of the TFL's London Underground Improvement works

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Penny Collins	bhlp051	Housing growth Chapter 03 - Key Policy Areas - Policy BHL01: Housing growth	I have grave reservations about these plans in respect of the number of dwellings suggested. Not only is there no infrastructure to support a growth in population of this size but there are huge flaws in the assumptions regarding transport. The transport links are NOT good - the 158 bus is unreliable, the W15 is often overcrowded to the point of refusing passengers, & regularly ceases to provide a service beyond the Renness Road stop. Given that the plans suggest families be located on the Billet Road site, the W11 would then be serving 3 large estates - Priory Court, the new build off Billet Road & Chingford Hall with attendant children needing buggy space. (which is even now "oversubscribed") It is all very well to say that car ownership will be less necessary but experience indicates this is unlikely & Billet Road in particular could become impassable should the probable 1000 extra vehicles take to the road. Having been involved in the previous round of Regen for Blackhorse I am somewhat sceptical about the provision of anything other than the housing which is obviously the developers' main interest & would encourage the Council to ensure that the other promises are set in stone before going ahead.	Blackhorse Lane forms part of the Upper Lee Valley Opportunity Area, identified in the London Plan as a major area of growth. It is also identified in our Core Strategy as one of the boroughs key growth areas. The proposals in the AAP are consistent with both of these higher level documents. Transport links are comparatively better than many other parts of the borough, and work is underway by TFL to look at improving capacity and reliability across the Upper Lea Valley. The AAP is intended to set out a balanced approach, which facilitates a sustainable pattern of development, rather than just housing development.
Giles Dolphin, Planning Decisions Unit Greater London Authority	bhlp0192	Chapter 03 - Key Policy Areas - Policy BHL05: Employment	The AAP selects option B as the preferred approach as it allows for the delivery of employment uses through mixed use developments. The Council prefer this approach because it is considered to be a flexible approach to the loss of employment land (option A) and does not confine employment uses within defined areas/distinct zones (option C). This approach is supported as it allows for flexibility, but at the same time recognises that in reality, elements of option A and C will still need to be taken forward to provide a balance to employment so that heavier industrial uses will be kept away from sensitive receptors and existing businesses will be maintained and redeveloped where possible to form part of a 'heritage-led regeneration strategy'. In option A new development should not simply replace unused land or sites where businesses are not in operation without adequate justification. The Council will need to balance the redevelopment of employment land for retail and residential uses.	Noted
Michael Leigh, Chair Blackhorse Action Group	bhlp0141	Chapter 03 - Key Policy Areas - Policy BHL05: Employment	D. Not exclude SIL where appropriate. F. Promoting apprenticeships especially on green buildings; e.g. making green roofs, installing renewable energy solutions etc. E. Refurbishment should meet the highest environmental standards.	D. The purpose of SIL is to provide land for industrial uses that cannot site comfortably alongside residential. This could include businesses such as green industries; e.g. manufacture of renewable technologies. Uses such as training centres, schools and colleges, will often not be

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				compatible with surrounding uses in these areas. F. Noted. Policy BHL5 to be amended to make clear that employment and training also refers to the construction phase and explanatory text added to highlight opportunities for training in green industries and synergies with encouraging such uses at land designated as SIL E. Agreed - to be made explicit through revised wording
Ortrun Peyn	bhlpo174	Chapter 03 - Key Policy Areas - Policy BHL05: Employment	Some businesses on SIL might well offer excellent training/ education opportunities.	Noted. Training within businesses may be feasible, but mixed use developments would undermine the purposes of designating land as SIL; i.e. providing for businesses that cannot comfortably sit alongside more sensitive uses such as housing and schools
Dr Tristan Moyle	bhlpo10	Chapter 03 - Key Policy Areas - Policy BHL06: Neighbourhood centre	Option A definitely the best; sometimes the area around a tube can badly deteriorate with the presence of drinking establishments (depending on the type); the open space should be visible directly from the station, so creating a sense of space and providing impact on leaving the tube - would the Standard building block the view?	Support for Option A is welcomed. It is envisaged that open spaces at the Station Hub (Site BHL1) will take the form of internal courtyards, and a linear park that provides a new east west link to the Wetlands, as set out in the Urban Design Framework. Courtyards are considered the most appropriate form of open space so that an attractive public realm that is screened from road traffic can be achieved.
Katy Andrews	bhlpo157	Chapter 03 - Key Policy Areas - Policy BHL06: Neighbourhood centre	This could rejuvenate the existing shops, or kill them off. Most are owned by long established local people who live in the area, and are a great community focus. Commercial competition isn't a planning consideration and it's impossible to legislate against betting shops, pubs or chain stores. This needs to be handled with great care, sensitivity, and local consultation.	Noted. Policy BH6 aims to provide for a range of town centre uses as part of the neighbourhood centre.
Michael Leigh, Chair Blackhorse Action Group	bhlpo142	Chapter 03 - Key Policy Areas -	A. But not exclude amenities outside that focus E. Should include cultural and social amenities. F. 'Boutiques' showcasing local business and entrepreneurs will be safer if large (supermarket-friendly) spaces are permitted to overwhelm them.	A. Noted. The exact boundary for the neighbourhood centre will be set out in the Proposed Submission.

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		Policy BHL06: Neighbourhood centre		Some amenities outside of the boundary may be possible to justify, but our strong preference will be that they are focussed within the neighbourhood centre. E. Noted. Policy to be amended to include D2 uses also. F. Our intention is to limit opportunities for large supermarket developments to allow smaller local businesses to survive and thrive, and help foster as sense of community.
Ortrun Peyn	bhlpo175	Chapter 03 - Key Policy Areas - Policy BHL06: Neighbourhood centre	A. Provided this includes a cultural/ performance venue, e.g. theatre/ concert hall F. Smaller shops are preferred	A. Support for performance venue noted F. Support for smaller shops noted. Our intention is to facilitate these by restricting the development of larger stores within the neighbourhood centre.
Dr Tristan Moyle	bhlpo12	Chapter 03 - Key Policy Areas - Policy BHL07: Design and local character	A picture giving an example of the type of proposed housing/building would be useful	Our intention is not to stifle innovation by being prescriptive about what schemes should aspire to, but instead set out some broad principles. Having said this, the image of Papermill Place in Chapter 1.3 'Where are we now and where do we want to be?' gives an example of a local scheme of design merit.
Katy Andrews	bhlpo158	Chapter 03 - Key Policy Areas - Policy BHL07: Design and local character	Building heights should not exceed 3/4 storey. Urban environments in a free market economy grow haphazardly and organically, and do respond to changing trends. The option to impose a 'new character' on the area is not supported. Since there is a predominantly 2-3 storey existing character, it is obscene to suggest that 6 storeys would be acceptable. (What would be the point of retaining the Thorn/ EMI building if everything else looked the same?) Also the Standard is of little if any architectural merit.	Predominantly 3-6 storey developments is supported by the Urban Design Framework in the interests of respecting the existing urban fabric, making efficient use of land, and considering development viability. Our approach is supported by the Interim Sustainability Appraisal Report, and English Heritage.
M Kahn	bhlpo213	Chapter 03 - Key Policy Areas - Policy	5-6 storey development is suitable	Support noted



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		BHL07: Design and local character		
Michael Leigh, Chair Blackhorse Action Group	bhlp0143	Chapter 03 - Key Policy Areas - Policy BHL07: Design and local character	A. Viability should be construed ambitiously, including environmentally friendly places B. STRICTLY, not primarily, with a maximum of 5 storeys C. Within the constraints of objective 4.	A. Noted B. Policies on heights follow guidance provided in the Urban Design Framework C. Noted.
Mr Nick Delaney, Legal and General	bhlp0100	Chapter 03 - Key Policy Areas - Policy BHL07: Design and local character	Policy BHL7 seeks to ensure appropriate building heights of primarily "between 3-6 storeys". IPIF is concerned that this may be interpreted as a blanket ceiling on development, without allowing for site specific assessment, the local context and other objectives for the area. It is noted that previous guidance for site BHL1 sought more broadly to encourage "dramatic gateway or landmark development" that will be seen by people entering the area from the west and mark Blackhorse Lane as a location.	It is anticipated that the vast majority of buildings in the area will be 3-6 storeys to respect the existing urban fabric. This is in line with guidance in the Urban Design Framework, based on an assessment of the local context. It is important for the AAP to set parameters for site specific proposals to be considered against. Dramatic gateway and landmark developments can be achieved regardless of building heights by using exemplary design quality
Ortrun Peyn	bhlp0176	Chapter 03 - Key Policy Areas - Policy BHL07: Design and local character	B. Restrict building heights strictly to 4 storeys	The Urban Design Framework supports our approach of 3-6 storeys across the area, which takes account of the existing built fabric, PTAL levels, and viability. This approach is supported by English Heritage, and the findings of the Interim Sustainability Appraisal Report
Dr Tristan Moyle	bhlp013	Chapter 03 - Key Policy Areas - Policy BHL08: Open space and nature conservation	Any measures in place to make the cycle paths ostensibly safe to use, esp. in the evening?	As the proposed cycle route in figure 13 is located along the waters edge, away from the main road network, road traffic accidents will not be an issue. By providing a direct route along this attractive environment, demand for use should be high, thus enhancing

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				opportunities for natural surveillance.
Jae Shannon	bhlp0122	Chapter 03 - Key Policy Areas - Policy BHL08: Open space and nature conservation	I am concerned about the route shown down the Douglas Eyre Playing Field - if this is indeed through the Field what security protection is there for those (such as me) whose property backs on to the field. At present the field is securely locked from evening to morning.	The proposed route will be through Lee Valley Regional Park, not Douglas Eyre Playing Field. It will therefore not allow access to the rear of properties that back on to the field.
Katy Andrews	bhlp0159	Chapter 03 - Key Policy Areas - Policy BHL08: Open space and nature conservation	This section is a bit woolly, with a lot of motherhood and apple pie visions and aspirations, but not much in the way of solid policies or proposals. Clearly it's an area where new ideas are still emerging, particularly in regard to the Walthamstow Wetlands project and how that will link in to the BHL AAP. Point C - a careful balance has to be struck between improving access and the needs of wildlife and biodiversity conservation. This document is very general and there needs to be a lot more work done. Possibly the Wetlands area should be taken as a separate issues/ strategy?	Noted. The Wetlands is a standalone project and work is ongoing. As this will be a major change to the local area, with huge community benefits, it is considered important to highlight this work within the Area Action Plan.
Michael Leigh, Chair Blackhorse Action Group	bhlp0144	Chapter 03 - Key Policy Areas - Policy BHL08: Open space and nature conservation	A. See also criterion of new open spaces D. There should be a north/ south one also, connecting to BHL2 E. The best pedestrian and cycling links should be sought everywhere, including east towards the marshes, and north throughout the development	A. Noted. D. Proposed improved north -south links are illustrated in figure 13 of the Preferred Options Paper. Furthermore, improved pedestrian crossings to the Standard Junction will enhance accessibility to the neighbourhood centre for residents in the southern portion of the area. E. Policy BHL12 sets out a commitment to a network of streets for all users. This includes pedestrians and cyclists.
Carmelle Bell, Thames Water Utilities Ltd	bhlp0104	Chapter 03 - Key Policy Areas - Policy BHL09: Walthamstow Wetlands	The inclusion of Policy BHL9 within the AAP is supported. As set out above Thames Water supports the objective of securing improved public access to Walthamstow Reservoirs, whilst ensuring the areas biodiversity and nature conservation value is not compromised and the functional / operational aspects of the site are taken into account. Thames water supports the objective of refurbishing the Marine Engine House to provide an educational resource and wetland centre.	Support welcomed
Jae Shannon	bhlp0121	Chapter 03 - Key Policy Areas - Policy BHL09: Walthamstow	I strongly disagree with making the reservoirs more open to access - they are a quiet wildlife area and are already easily accessible. They should not be open to children and dogs - they are for the wildlife and fishing and birdwatchers.	Improving public access to the reservoirs has strong support from partners such as Lee Valley Regional Park, Thames Water, the Environment Agency and the Council. Previous consultation

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		Wetlands		exercises have also indicated high levels of public support. The findings of the Interim Sustainability Appraisal report supports improved public access to the Wetlands.
Katy Andrews	bhlpo160	Chapter 03 - Key Policy Areas - Policy BHL09: Walthamstow Wetlands	This seems to have been bolted on to the AAP at the last moment, and is hardly at a stage where any meaningful consultation can yet be undertaken.	This consultation seeks broad support for the principles of the project, and highlights some of our key aspirations and project areas that will be developed in more detail in time.
Michael Leigh, Chair Blackhorse Action Group	bhlpo145	Chapter 03 - Key Policy Areas - Policy BHL09: Walthamstow Wetlands	C. As long as it includes pedestrian/ cycle access to the wetlands and does not involve high rise buildings. D. So long as no other area suffers and developer contribution are very well negotiated to optimise local benefit.	C. It is intended that key access points to the Wetlands will be primarily accessed by pedestrians and cyclists - capitalising on existing accessibility from both Blackhorse Road and Tottenham Hale stations. In our Core Strategy tall buildings are defined as 10 storeys and above. Such building heights are not envisaged within the Blackhorse Lane area. D. Noted
Mr David Boote, Waltham Forest Footpath Secretary Ramblers' Association	bhlpo24	Chapter 03 - Key Policy Areas - Policy BHL09: Walthamstow Wetlands	Support the policy generally and in particular improved pedestrian access to the Reservoirs.	Support welcomed.
Mr Stephen Wilkinson, Head of Planning and Regeneration Lee Valley Regional Park Authority	bhlpo95	Chapter 03 - Key Policy Areas - Policy BHL09: Walthamstow Wetlands	Walthamstow Wetlands - The Authority endorses the focus on the Walthamstow Wetlands project in Policy BHL9 Walthamstow Wetlands'. The Authority will shortly be producing proposals for this area as part of its Park Development Framework. These proposals will update the Park Plan 2000 proposals and take account of new initiatives such as the Walthamstow Wetlands project. It is a requirement of the Park Act 1966 that the Authority's Proposals are included in Waltham Forest's relevant planning documents. A similar approach has been adopted by the Council in the Northern Olympic Framework AAP. It is suggested that a second part to policy BHL9 is added as follows: Policy BHL9: Walthamstow Wetlands and Lee Valley Regional Park We will work with partners to promote and deliver Walthamstow Wetlands as an urban nature reserve and wetland centre to enable access to open space and nature for residents of Blackhorse Lane, and support the wider visitor economy. This will be achieved by: A) securing improved public	Support welcomed. To avoid confusion, the Walthamstow Wetlands boundary will be revised to be in accordance with the Core Strategy, and focus on the project area, rather than surrounding landscape. In light of these mapping changes, references to visitor accommodation will not be included; since this refers to proposals by the Lee Valley Park in the Northern Olympic Fringe, rather than Blackhorse Lane area. First

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			<p>access to Walthamstow Reservoirs, whilst ensuring the areas biodiversity and nature conservation value is not compromised; B) refurbishing the Marine Engine House to provide an educational resource and wetland centre; C) enhancing the physical appearance of Forest Road as a key gateway into Walthamstow Wetlands; D) pooling funding from a range of sources, including developer contributions where appropriate. We will 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 These changes are required to policy text to ensure consistency with the Authority's adopted proposals otherwise an objection will be made. Supporting text will need to reference the statutory purpose of the Regional Park and status of the Authority's proposals. An appendix setting out the Park Plan and/or PDF Area Proposals should also be added to the AAP. New Boundary for Walthamstow Wetlands The Walthamstow Wetlands area is identified on a plan at Fig 10. It is shown extending beyond the HLF bid area around the reservoirs to include land within the Park to the north and south of Lea Bridge Road. This land also lies outside the boundary of the Blackhorse Lane AAP. During the recent Public Hearing into Waltham Forest's Core Strategy officers were presented with the same plan showing a boundary for the proposed Walthamstow Wetlands area which extends beyond the HLF bid area. Concerns were raised as the Authority had not been given the opportunity to consider this new boundary. This consultation on the Blackhorse Lane AAP represents the first opportunity to consider the full extent of the new boundary which includes large areas of the Park extending south from Walthamstow Marshes including the Authority's facilities on Lea Bridge Road. It is understood that the plan included in the Core Strategy will revert to showing the original boundary around the reservoirs and Walthamstow Marshes. The role of Area Action Plan is to provide greater detail on areas of change and offers scope to consider the new and extended boundary.</p>	<p>sentence of proposed wording changes to BHL9 will be included though. Explanatory text regarding the purpose of the Regional Park will also be added, along with a reference to the Park Plan as part of the evidence base for the AAP.</p>
Ortrun Peyn	bhlp0178	Chapter 03 - Key Policy Areas - Policy BHL09: Walthamstow Wetlands	C. A gateway to where? Does this mean more cars? High rises in Forest Road?	Access to the Wetlands is envisaged to be predominantly through sustainable modes of transport, capitalising on its position between Blackhorse Road and Tottenham Hale stations
Katy Andrews	bhlp0161	Chapter 03 - Key Policy Areas - Policy	Will an identified site be suggested in the LDF/ AAP, or is this an aspirational matter of principle? (I don't object, it just isn't clear)	Further feasibility work is required before an exact location for any local energy centre can be identified. Such work is underway

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		BHL10: Decentralised energy		
Mark Hayes, Chief Executive Christian Action Housing	bhlp033	Chapter 03 - Key Policy Areas - Policy BHL10: Decentralised energy	I support BHL10 in principle, but what does 'connection ready' mean? This needs to be resolved very quickly as it may have fundamental implications for new developments, depending on the energy source and network system used	As referred to in the AAP Preferred Options, work is underway at a sub regional level on exploring options for a decentralised energy network in the Upper Lee Valley. Initial findings of this study indicate that it is quite possible that new developments in the Blackhorse Lane area may come forward prior to the infrastructure for a district heating network is secured. To avoid lost opportunities, developments will therefore need to be designed to enable connection to the network at a later date, taking account of likely piping routes.
Michael Leigh, Chair Blackhorse Action Group	bhlp0146	Chapter 03 - Key Policy Areas - Policy BHL10: Decentralised energy	What is a district heating network? Any proposed power plant will require extreme consultation, should be emission zero, and an exemplar of green power generation power technologies.	A district heating network is the connection of a series properties to a central heating system. This could be through piping to an existing power station, or a smaller central heating system within the area. Options are currently being explored at a sub regional level.
Carmelle Bell, Thames Water Utilities Ltd	bhlp0106	Chapter 03 - Key Policy Areas - Policy BHL11: Flood Risk	The use of SUDS is supported, however it should be noted that where SUDS are not well maintained they will be less effective in allowing water to soak into the ground or releasing it to drains. Therefore, they are less likely to prevent surges in rainwater runoff reaching the sewer system.	Noted. Policy BHL11 to be added to in order to highlight the importance of management arrangements for SUDs.
Ms Candice Beard, Planning Liaison Officer Environment Agency	bhlp080	Chapter 03 - Key Policy Areas - Policy BHL11: Flood Risk	Options A, B and C are all appropriate ways of addressing flood risk. The preferred Option is to combine Options B and C. The Blackhorse Lane Area has already been Sequentially Tested as part of the Core Strategy, which highlighted Blackhorse Lane as a key regeneration area. But as Option B points out, the need to apply the Sequential Test/approach for sites within the Blackhorse Lane area should not be forgotten. You can still use your Strategic Flood Risk Assessment to help you decide what types of development (looking at their vulnerability) are best located where, within Blackhorse Lane, in terms of flood risk. Option B - PPS 25 is Development and Flood Risk not Planning and Flood Risk. Option C focuses mainly on surface water flooding and not the impact of flooding from other sources	Noted, and support welcomed. Alterations to points A and D of policy accepted. References to PPS's altered to NPPF; since this now superseded PPS's. Explanation of how the sequential test is passed for the Station Hub site to be included in the proposed submission.

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			<p>such as fluvial flooding from the Dagenham Brook and the Flood Relief Channel, which is just as important to deal with. Existing and new developments should take the opportunity to minimise or reduce all sources of flood risk. If Option C were to be chosen it should be amended to cover all sources of flood risk and not just focus on surface water management. PPS25 requires all forms of flooding and their impact to be considered as a material planning consideration. Policy BHL11: Flood Risk As above, we think that the first point in this policy should be the preference to place development outside flood risk areas, in line with Option B. Point A should be reworded to read...should be designed and sited to minimise and reduce flood risk to new...' Point D is worded slightly incorrectly. It is not the case that compensation is required for development in Flood Zone 3a. In fact, compensation is required for any development that falls within the area denoting the 1 in 100 chance in any year flood event, taking the effects of climate change into account. The extent of this flood event should be established in an appropriate Flood Risk Assessment if the site falls in Flood Zones 2 or 3. It seems to be a common misunderstanding/misconception that the Flood Zones are the same as the extent of flooding on site based on detailed modelling and site specific topographical data. This is not the case. Flood Zones are indicative and are based on LiDAR topographical data and does not account for flood defences or climate change. Apart from this, we are fully supportive of the approach presented within Policy BHL11.</p>	
<p>Giles Dolphin, Planning Decisions Unit Greater London Authority</p>	<p>bhlpo197</p>	<p>Chapter 03 - Key Policy Areas - Policy BHL12: Sustainable transport</p>	<p>The requirements placed on new development by policy BHL 12 'Sustainable Transport' to satisfy a range of criteria relating to improving the pedestrian and cycling environment around the station hub is welcomed in line with London Plan policies 6.9 and 6.10. TfL supports the aspirations to improve permeability to the station, given the congested nature of the Standard junction, as well as improved connections to the Lee Valley Park. An appropriate wayfinding strategy, possibly utilising TfL's Legible London scheme, could promote sustainable movement through the area and emphasise the interchange function of Blackhorse Road station. The emphasis on restraining car parking and the importance of travel planning is in line with London Plan policy 6.13, and TfL particularly welcomes the proposals for developments close to the station to be 'car-free'. Any car parking proposed in this area should not exceed the minimum necessary to support the role and function of the new neighbourhood centre. Policy BHL 12 'Sustainable Transport' should reference the requirement for future planning applications to include adequate provision for bus stops and bus routings to the satisfaction of TfL, in line with London Plan policy 6.7. Where the impact of a particular development is such that new, diverted or extended bus routes will be required to serve a site, the applicant will be expected to fund and provide suitable bus standing and driver facilities. Equally, appropriate provision for taxis and private hire vehicles should be made within new developments in line with the Mayor's Land for Transport Functions SPG. Development proposals which may attract a high number of taxi trips should be required to provide appropriate standing and ranking facilities as necessary. TfL is concerned that BHL 12 does not contain any</p>	<p>Support noted for the general thrust of the policy and the car-free policy. The Council is introducing 'Legible London' signage as part of its Major schemes at Wood St and Leytonstone Town Centre and will consider Blackhorse Lane should future funding become available. The Council's forthcoming Development Management Policies DPD and Sustainable Transport SPD will outline developer requirements for Delivery Service Plans and improvements to the public transport network. Both documents will be sent to the GLA for comment. The Council will also consider the implications of the TfL's Strategic Transport Study in future iterations of the AAP.</p>

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			<p>reference to delivery and servicing arrangements. Development in the Blackhorse Lane area will increase the amount of delivery and servicing traffic needed, particularly for the retail, bars and restaurants being promoted, so this should be addressed in the policy. Consideration must also be given to the impact that freight and construction trips may have on the surrounding network and new developments should be expected to mitigate the impact of these movements. In this respect, section 'vii' of BHL 12 should be supplemented to include a requirement for both delivery and servicing plans and construction logistics plans for new development proposals. TfL's Strategic Transport Study aims to quantify the likely impact of development on the capacity of the Victoria line, which is currently severely overcrowded in the AM peak hour south of Finsbury Park, and will suggest appropriate solutions. Whilst the current upgrade of the frequency of the Victoria line is almost complete, future development will add further strain. Such constraints on capacity should be taken into consideration when assessing development proposals at Blackhorse Lane, and reference should be made to the Transport Study in this respect.</p>	
Katy Andrews	bhlp0163	Chapter 03 - Key Policy Areas - Policy BHL12: Sustainable transport	<p>Predict and provide always means more roads, more traffic capacity, more vehicles, more pollution and noise, less quality of life and a motorised environment. Please don't go down that discredited route. Let things work themselves out organically. The station car park has traditionally been used by people driving in from Essex. If it's removed, they will have to drive further into town to park, adding to traffic congestion along Forest Road, Ferry Lane and Seven Sisters Road - landscaping the car park and putting trees in would improve the appearance; removing it just releases another building site (or potentially drive-thru takeaway outlets), and discourages car-drivers from leaving their vehicles and continuing their journeys by rail.</p>	Noted - contrary to the proposals under the IPPF, our intention is to now focus more on sustainable modes of transport and discouraging car use
M Kahn	bhlp0217	Chapter 03 - Key Policy Areas - Policy BHL12: Sustainable transport	More car parking needed	Providing a high level of car parking in new developments will lead to increased traffic congestion and carbon emissions
Mark Hayes, Chief Executive Christian Action Housing	bhlp035	Chapter 03 - Key Policy Areas - Policy BHL12: Sustainable transport	This policy should be strengthened further by the inclusion of investment in the station, to make it more attractive and better able to cope with larger passenger flows. This might be achievable through a mixed use redevelopment of the station site itself.	Direct investment in the station is funded directly by Transport for London and falls outside the scope of the AAP. Current planned works include provision of step free access, but large scale redevelopment of the station is not anticipated. In terms of enhancing accessibility to the station, under point vi of the policy, reference is

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				made to requirements for financial contributions towards the Standard Junction.
Metropolitan Police Authority/Metropolitan Police Service (Agent: Mr John Smith of Cgms)	bhlp053	Chapter 03 - Key Policy Areas - Policy BHL12: Sustainable transport	<p>I write on behalf of our client, the Metropolitan Police Authority (MPA)/ Metropolitan Police Service (MPS). The MPA/MPS provide a vital community service to the Borough of Waltham Forest and policing is recognised within the 2011 London Plan as being an integral part of social infrastructure. The MPA/MPS have previously made representations to the Walthamstow Town Centre and Blackhorse Lane AAP Notices of Preparation on 24th March 2011 (copy attached) and to the Core Strategy and Development Management Policies DPD at each stage of consultation. Relevant Planning Policy The provision of effective policing is of crucial importance across London to ensure safe places to live are created as part of a sustainable community consistent with planning policy. National Policy PPS1 - paragraph 27 (iii) In development plan preparation the need to promote communities which are healthy, safe and crime free is highlighted. PPS12 - requires emerging development plan policy to be consistent with the adopted development plan and 'soundness' requires DPD policies to be consistent with national policy. One of the objectives of the Draft National Planning Policy Framework (NPPF ) July 2011 is to deliver the right community facilities, schools, hospitals and services to meet local needs (para 124). London Plan Policies At strategic level, paragraph 1.40 of the London Plan (July 2011) states 'a growing and increasingly diverse population will create demand for more social infrastructure' which, by definition, includes policing and other criminal justice or community safety facilities. This is reflected in Policy 3.16 Protection and Enhancement of Social Infrastructure which states that 'London requires additional and enhanced social infrastructure provision to meet the needs of its growing and diverse population'. Paragraph 3.89 further notes that existing or new developments should, wherever possible, extend the use of facilities to serve the wider community, especially within regeneration and other major development schemes. Mindful of the background at strategic level, a number of representations are hereby set out below which take into consideration the policy context and MPA's/MPS's objectives. Representations Walthamstow Town Centre AAP Policy WTC12 - Car and Cycle Parking Blackhorse Lane AAP Policy BHL12 - Sustainable transport Previous representations to the Notices of Preparation requested that parking should be considered on a site by site basis with operational requirements taken into account. However, both of these policies continue to refer to the standards in Development Management Appendix 4. On this point we would note that representations submitted to the Development Management DPD Preferred Options in February 2011 also requested that car parking provision should be considered on a site by site basis, in order to take into account operational requirements. The Proposed Submission is due out for consultation Nov/Dec 2011 so it is unclear at this stage whether this has been taken on board. However, we would stress that London Plan (2011) Parking Addendum to Chapter 6 'Parking for emergency services facilities', para 6A.10 states that 'Provision for parking at</p>	<p>The importance of community safety and effective policing is recognised. Parking Standards contained in Appendix 4 of the Development Management Policies, which are signposted in this document, aim to strike a balance between minimising car use, and the operational requirements of different uses. Providing no standards would undermine efforts to create a sustainable pattern of development. No specific standards are set out for uses such as Police Stations. Where no standards are proposed, it is made clear that matters such as the nature of use, servicing requirements, and capacity of the site, will be key considerations.</p>



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			ambulance, fire and policing facilities will be assessed on their own merits.' It is requested that the above suggestions are taken on board by the Council in preparing the next versions of the Area Action Plans.	
Michael Leigh, Chair Blackhorse Action Group	bhlp0148	Chapter 03 - Key Policy Areas - Policy BHL12: Sustainable transport	A. No idea what this means; the odd 'square' would be nice D. Need better bus access to Central London - e.g. the 73 bus all day long	A. Streets for all users means that they are designed with pedestrians and cyclists in mind; not prioritising road traffic. D. Point (A) (iv) of Policy BHL12 refers to financial contributions towards proposed improvements in sustainable transport projects. This could include funding towards new or improved bus services in the area. However it should be noted that running a day service for the 73 bus would come at considerable expense, and there is currently a limited amount of public funding available to subsidise. The issue will nevertheless be raised within TfLs review of bus services.
Mr Stephen Wilkinson, Head of Planning and Regeneration Lee Valley Regional Park Authority	bhlp096	Chapter 03 - Key Policy Areas - Policy BHL12: Sustainable transport	A policy should be added to the AAP to formalise the Council's intention to secure an extension to an existing cycle/pedestrian route, outside but adjacent to the reservoirs. In the supporting text the Council has identified the benefits of extending an existing pedestrian/cycle route from the north of the AAP area down to Olympic Park. The route passes alongside the base of the reservoirs banks and along the edge of the Douglas Eyre Playing Fields utilising an existing underpass beneath the railway. This is in effect the route of the Lee Valley Pathway and the extension would continue from the section of pathway already installed by the Authority in partnership with EA and WF. This would provide an off road public access route through the Park between centres of activity. A policy reference to this route could be added to BHL12 Sustainable Transport to enhance pedestrian and cycle access to the Lee Valley Regional Park The AAP should also address the issue of increasing the head height of railway bridges where these cross paths/routes that allow access to the Regional Park. The low 5ft underpass at Coppermill Lane is the major issue within the Blackhorse Lane area as this is an important access point into the Park for pedestrians and cyclists from the adjoining communities to the east. The AAP includes a proposal for a new east-west linear park link from Blackhorse Lane through the industrial and urban area to connect with new improved waterside pedestrian and cycle links adjacent to the Flood Relief Channel. Although this link may benefit local movement through the area and potentially into the Park it would be useful if the AAP could provide more detail on how visitor access through into the Park will be improved. The Authority	Support noted. Additional text to be added to policy BHL12 (iv) to formalise proposals set out in figure 13 of Preferred Options document. Additional text to be provided to highlight how improved links will enable better access to the Park. Raising railway bridge heights is notoriously expensive so is not included as a key project that new developments will be required to contribute to. Section 3.11 of the Preferred Options paper sets out our priorities in terms of physical projects that we feel offer better value for money and maximum gains for the local community. More cost effective solutions to this issue, such as improved signage warning users of low bridge heights, are nevertheless being explored by the Council. Visitor access through the

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			supports the provision of a direct 'green link' from the station hub to the waterside pedestrian and cycle route. This would encourage visitors to travel to the Park by public transport. The Authority wishes to be kept involved in any future discussion about the Blackhorse Lane AAP and looks forward to being consulted on the Submission version of the AAP in due course.	park will be enhanced through the Walthamstow Wetlands Project. The Proposed Submission AAP will set out further detail as such plans progress.
Ortrun Peyn	bhlp0180	Chapter 03 - Key Policy Areas - Policy BHL12: Sustainable transport	A. What does this mean?? What would be the alternatives? I don't understand the question.	Streets for all users is a move away from earlier engineering solutions to road traffic, so that sustainable movement, through walking or cycling, are encouraged
Katy Andrews	bhlp0164	Chapter 03 - Key Policy Areas - Policy BHL13: Social Infrastructure	We are very short on live entertainment and decent pubs, but the Royal Standard wasn't much of a community hub even at the best of times	The Royal Standard divides opinion. Some members of the community believe it was an important community hub.
Mark Hayes, Chief Executive Christian Action Housing	bhlp036	Chapter 03 - Key Policy Areas - Policy BHL13: Social Infrastructure	The policy should be strengthened in terms of providing community uses and social infrastructure when this is possible	Proposed submission will add greater detail of the needs arising from projected development in terms of community uses and social infrastructure. Current policy wording requires the provision of new uses and facilities where possible.
Michael Leigh, Chair Blackhorse Action Group	bhlp0149	Chapter 03 - Key Policy Areas - Policy BHL13: Social Infrastructure	A. Include cultural and social amenity. B. The Standard as a music venue, perhaps incorporating a pub. Note the current pub is 'The Tryst' C. Loss of social infrastructure must be more than resisted, it must be ruled out.	A. Cultural and social amenities are a valued use that we will encourage within the neighbourhood centre, in the interests of creating a sense of place B. All references to the Royal Standard to be amended to 'The Royal Standard Music Venue and The Tryst Public House.' C. It is difficult to categorically say there will be no loss of social infrastructure in a climate of public spending cuts. Where such infrastructure is lost, we will aim to re-provide with other uses that are of benefit to the community.
Mr Nick Delaney,	bhlp0101	Chapter 03 -	Policy BHL13 refers to the use of planning obligations. Whilst supporting the	Noted. Reference to planning

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Legal and General		Key Policy Areas - Policy BHL13: Social Infrastructure	regeneration and renewal of community facilities and social infrastructure in the area, IPIF is of the view that the supporting text should refer to the guiding principle of Regulation 122 of the CIL regulations on the current use of S106 Agreements. It states that no benefit/contribution should be made/paid to the public realm works unless (inter alia): * it is necessary to make the development acceptable in planning terms; * directly related to the development; and, * fairly and reasonably related in scale and kind to the development.	obligation requirements to be inserted into Proposed Submission
Ortrun Peyn	bhlp0181	Chapter 03 - Key Policy Areas - Policy BHL13: Social Infrastructure	A. Include a cultural centre. B. Provided the Standard Pub is transformed into a cultural/ performance centre.	Support for cultural uses noted. Such uses will be welcome within the neighbourhood centre
Rose Freeman, Planning Policy Officer The Theatres Trust (for arts & culture issues only)	bhlp062	Chapter 03 - Key Policy Areas - Policy BHL13: Social Infrastructure	Due to the specific nature of the Trust's remit we are concerned with the protection and promotion of theatres and therefore anticipate matters relating to cultural facilities. Option B We support this choice of option for the reasons given in the Justification section but have no other comments that may be useful other than reiterating some thoughts from our response to the Walthamstow AAP. Pubs can be encouraged to expand to provide additional leisure venues for a range of performance spaces, for new plays and dance, and live music and comedy, to make a vibrant contribution to the evening economy and to help ensure their survival. When contemplating suitable sites for new social infrastructure, the refurbishment and re-use of existing buildings usually requires significantly less energy than building new ones and therefore supports the aims of sustainable development. This option should be seriously considered particularly where the existing building makes a positive contribution to local character or where it can form the basic building block of a new development. We look forward to being consulted on further planning policy documents.	Support welcomed. Additional text to be added to further highlight the importance of providing spaces for social interaction
Giles Dolphin, Planning Decisions Unit Greater London Authority	bhlp0198	Chapter 03 - Key Policy Areas - Section 3.11 - Implementation	All growth within the AAP area will be expected to be consistent with the accessibility and capacity of the surrounding public transport and highway networks. The package of mitigation measures, as outlined in Chapter 3.11 'Implementation' is therefore welcomed, as is the reference to the future requirements of a borough-wide Community Infrastructure Levy (CIL). The Mayor intends to introduce a London-wide CIL (a draft of which has been through two rounds of public consultation) and the AAP may benefit from reference to this. You will be aware that boroughs will need to take account of the Mayor's CIL when setting their own. Whilst TfL notes that the AAP area does not include any roads that are designated as part of the Transport for London Road Network (TLRN), the impact of any proposed highway or junction improvements will need to be assessed in relation to their impact on the A503, the junction of Blackhorse Lane and the A406, as well as the A10 corridor. In the interests of smoothing traffic flow and London Plan policy 6.11, any changes to the junctions or highways	Support welcomed. CIL for Crossrail is referred to in paragraph 3.11.5 of the Preferred Options Paper. GLA and TfL will be consulted on any highways improvements in the area, including interventions such as improvements to the Standard Junction. Such measures will seek to ensure land is adequately safeguarded for transport functions, and unacceptable delays to the Strategic Road Network are avoided. The next iteration of the

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			surrounding Blackhorse Lane must be designed to ensure they do not have an unacceptable impact on these sections of the TLRN. This should be reflected in Chapter 3.11. In relation to specific developments, once assumptions about mode shift and peak travel demand from individual proposals have been assessed and modelled then local highway capacity improvements may be appropriate. The above should be emphasised in BHL 12. Equally, as Forrest Road and Blackhorse Lane form part of the Strategic Road Network (SRN), vehicular access to sites adjacent to these roads (particularly sites BHL 1 and BHL2) should be taken from local roads. TfL understands that neither site BHL2 (north) nor BHL2 (south) encompass the station itself. This is not clear from the site descriptions nor the map at Figure 15, and TfL recommends that this is clarified in the next draft of the AAP. Reference should be made to any elements of safeguarded land for transport, as detailed in the Land for Transport Functions SPG, including the Forest Road bus lanes, bus stops and the station itself.	AAP will make clear that Blackhorse Road Station is not identified as a development site.
Katy Andrews	bhlp0165	Chapter 03 - Key Policy Areas - Section 3.11 - Implementation	I have never before heard the Blackhorse Lane crossroads referred to as the 'Standard Junction.' The old pub sign, was 'Royal Standard'. Not sure what point D is actually suggesting. There is a towpath the entire length of the River Lee navigation, from Ware to the Limehouse Basin, which includes the whole length of the Hackney Cut (which starts just south of Lea Bridge Road), which runs along the immediate western edge of the 'Olympic Park'. This policy therefore seems utterly redundant, and I don't see its relevance to LBWF.	Point D refers to the proposals set out in Figure 13 of the Preferred Options Paper
M Kahn	bhlp0219	Chapter 03 - Key Policy Areas - Section 3.11 - Implementation	Better use of funds can be made than for the towpath to the Olympic Park	A new towpath offers major gains for the local community in terms of enhancing accessibility to open spaces and facilities in the Olympic Park through an attractive walking/ cycling environment
Michael Leigh, Chair Blackhorse Action Group	bhlp0150	Chapter 03 - Key Policy Areas - Section 3.11 - Implementation	B. As long as wildlife and biodiversity is protected - i.e. no cars, no tarmac, no parking, and no deterioration to the quality, safety and aesthetic of the Wetlands. D. The towpath all along the river should be improved to match the standard of the path currently in Hackney. Strongly agree with the provision of diverse social and cultural amenities; e.g. music/ performance venue.	B. It is anticipated that physical links to the Lee Valley Park/ Walthamstow Wetlands will be sensitive to its biodiversity value, and capitalise on its accessibility by public transport. D. Noted. High standards to encourage use will be sought. Support for social and cultural amenities noted
Ortrun Peyn	bhlp0182	Chapter 03 - Key Policy Areas - Section 3.11 - Implementation	D. Hasn't this been done already? Certainly from Lea Bridge Road to Olympic Stadium	The proposed improved links are shown in figure 13 of the preferred options paper.

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		on		
Giles Dolphin, Planning Decisions Unit Greater London Authority	bhlp0191	Chapter 03 - Key Policy Areas - Section 3.2 - Housing	There is a high level of affordable housing need in Walthamstow and the borough wide affordable housing target is 50%. The Council seek to apply this percentage to sites within the AAP area. Whilst the borough's housing needs are recognised, there are some concerns with Affordable housing option B. The general principle of the London Plan (Para 3.74) is in that off site provision is only acceptable in exceptional circumstances. A list of exceptions are provided in the plan, one of which is the creation of 'mixed and balanced communities'. Prescriptive/blanket approaches to affordable housing on an area basis fail to recognise the scale of communities and how they function and live. Each development site identified, and applications generally, should be judged on a site by site basis, and the London Plan's "exceptional circumstances" bulleted in paragraph 3.74 should be considered and applied before such prescriptive area policies are applied. The GLA support Option A which is in line with the London Plan policy. Paragraph 3.2.4, page 19 makes reference to the use of 'Building for Life' standards, which were developed by CABE. GLA officers query whether this is the most effective and up to date assessment tool criteria for assessing the design quality of schemes. The borough may wish to consider the 'Lifetime Homes standards' in line with policy 3.B of the London Plan and the design standards set out in the EiP draft housing SPG, devolved from the London Housing Design Guide. Policy BHL4 - The GLA recommends the words 'subject to the exceptions criteria listed in paragraph 3.74 of the 2011 London Plan' be inserted after off site provision, removing the sole reference to 'in the interests of creating mixed and balanced communities'. Mixed and balanced communities is one of the criteria listed in the London Plan, if the local authority wishes to keep this in, the other criteria should also be inserted.	Revisions to affordable housing policy in the next iteration of the document will remove requirements for off site contributions; in recognition that recent permissions for largely private schemes has balanced out the emerging tenure make-up in the area
Giles Dolphin, Planning Decisions Unit Greater London Authority	bhlp0196	Chapter 03 - Key Policy Areas - Section 3.2 - Housing	AAP policies BHL 1 to BHL5 collectively promote high density housing and employment growth on the sites identified in Section 4 while BHL6 seeks to deliver a new neighbourhood centre close to the station. This aspiration to locate high trip generating developments in areas of high public transport accessibility levels (PTALs) is supported in line with London Plan policy 6.1, particularly considering the excellent rail and underground connections at Blackhorse Lane station.	Support welcomed
Jae Shannon	bhlp0113	Chapter 03 - Key Policy Areas - Section 3.2 - Housing	I strongly disagree with the proposed density of the developments and number of homes planned for the following reasons: - the roads and public transport will not be able to carry this number of extra people - there is already a huge development near Tottenham Hale and this will have huge impact when it is completed. - we already at the upper limit of water supplies in the Lea Valley - there is a huge amount of extra development being planned which cannot be sustainable.	Blackhorse Lane has been identified as a major growth area in both the Mayors London Plan and our Core Strategy. Broad decisions about the scale of growth in the area have therefore already been made. Part of the justification of this is the existing public transport infrastructure, which is relatively strong when compared to alternatives; given the benefits of

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				underground and overground trains, and a number of bus routes. Utilities providers have raised no objection to the scale of growth planned for the area.
Mark Hayes, Chief Executive Christian Action Housing	bhlp028	Chapter 03 - Key Policy Areas - Section 3.2 - Housing	<p>Papermill Place has established a density and new context for development located at a distance from Blackhorse Road Station. It would be a mistake to rule out higher densities outside the sites surrounding the station. A more varied mix than that proposed should be adopted. The key factor is the quality of design and the creation of effective and safe routes to and from the station.</p> <p>The phrase 'mixed and balanced communities' is not defined, save for this meaning less affordable housing on sites BHL4 and BHL6. This policy (BHL4) may be counterproductive, as affordable housing covers a range of products (rent and ownership) that are likely to provide the more stable members of the new communities, in terms of long term tenure and ownership. If Affordable includes key-worker, this further increases the stability of the local community. What are the non-affordable homes? If the assumption is they are owner-occupiers, then that assumption is wrong. This policy section requires further research and consideration.</p> <p>As a general point, naming the sites and policies with the same references (eg: site BHL 4 and policy BHL 4) is very confusing!</p> <p>A further point: BHL 1 should not restrict 'bringing forward housing as a key element of mixed use schemes' to just the key sites set out in Section 4. A number of other sites are in need of redevelopment if the overall regeneration of the area is to be truly effective.</p>	<p>The ability of Papermill Place to achieve a medium density successfully, due to decent design standards, is accepted. Nevertheless, our approach is that to enhance sustainability, the highest density developments in Blackhorse Lane should be located in those areas most accessible by public transport. This needs to be taken in the context of what has been defined as the Blackhorse Lane AAP area. In this context, Papermill Place is reasonably close to Blackhorse Road Station; certainly in comparison to more peripheral sites such as Billet Works (site BHL7).</p> <p>Revisions to affordable housing policy in the next iteration of the document will remove requirements for off site contributions; in recognition that recent permissions for largely private schemes has balances out the emerging tenure make-up in the area.</p> <p>The AAP is part of a larger suite of documents (the Local Plan). The abbreviation BHL is intended to make clear that policies and sites relate to Blackhorse Lane, not other AAPs such as Walthamstow.</p> <p>Throughout the document, references to policies and sites have been made using their full title, including policy name or site name. Policy BHL1: Housing growth, does not restrict housing to the key sites set out in Section 4 of the</p>

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				document. Part B of the policy specifically refers to housing being a potential acceptable use on as yet unidentified windfall sites.
Michael Polledri, Lee Valley Estates (Agent: Mr Jon Bradburn of Montagu Evans)	bhlp087	Chapter 03 - Key Policy Areas - Section 3.2 - Housing	<p>Housing Delivery The Council's preferred option for the delivery of 2000 new homes in the Blackhorse Road area over the next 15 years is to utilise a mix of densities based on PTAL levels, with higher density developments closest to Blackhorse Road Station. We believe that to deliver the required number of homes, Policy BHL2: Housing Densities should remove specific reference to sites surrounding Blackhorse Road. Any planning application which comes forward will have to have regard to the density matrix set out within the London Plan (2011), and Policy BHL2 (b) notes that any improvements in public transport will be a key consideration in the assessment of sites. As the area is regenerated, further improvements will come forward through increased demand for bus services, along with other improvements paid for through s106 and CIL payments. It is also important to consider the design of schemes when assessing their acceptability. The PTAL assessment is one of many considerations in the determination of a planning application, and a scheme of a higher density but of high architectural design quality may still be considered to be appropriate. PTAL densities should be identified as a gauge rather than a prescriptive limit. This is likely to occur in locations away from the station where larger development sites which can include areas of public realm alongside suitably sized residential units that may come forward. Affordable Housing In line with the policies of the Core Strategy, Policy BHL4 seeks a target of 50% affordable housing within the Blackhorse Lane Area, subject to viability. However, specific sites owned by Lee Valley Estates are also identified as the only sites suitable for an off-site contribution. Whilst we are not objecting to the principle of a payment in lieu if it delivers the right benefits for the local community, it would be useful to have the background to this policy for robustness in determining applications which come forward for the site. The AAP must discuss the reasoning for this in further detail, clarifying the basis for what is being sought and why this is considered to be appropriate. Key within this policy is the recognition that any affordable housing contribution will be subject to viability testing. Both the policy and the supporting text of the AAP must discuss this aspect in further detail, particularly with regard to the Council's recently adopted guidance on overage payments and how this will be applied to those sites within the AAP, as this will affect both the medium and long-term viability of projects.</p>	<p>It is considered that as currently worded, Policy BHL2 makes clear that PTAL is one of several considerations in determining housing densities. Regardless of what improvements are made to bus services over the lifetime of the plan, the areas around Blackhorse Road station will continue to be the most accessible part of the AAP area; given the existence of the tube and rail station, several bus routes, and planned investment in the Standard Junction and nearby cycle routes. It is therefore logical to set out a general stance towards higher density developments in these areas. Such an approach is supported by the findings of the Interim Sustainability Appraisal report. Sites at Sutherland Road (BHL4) includes land outside of Lee Valley Estates ownership. In instances where schemes are unable to meet policy requirements due to their limited viability, the Council has prepared guidelines for applicants to prove their assessment of viability and any supporting assumptions which might be used to further this argument. These guidelines set out the supporting information that is required for any assessment of viability and the process the Council will undertake on receipt of this. Revisions to affordable housing policy in the next iteration of the document will remove requirements for off site contributions; in</p>

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				recognition that recent permissions for largely private schemes has balances out the emerging tenure make-up in the area
Mr Ian Dubber, Workspace Group (Agent: Andrew Ransome of Ransome and Company Ltd)	bhlp057	Chapter 03 - Key Policy Areas - Section 3.2 - Housing	Workspace supports Option A, which seeks to increase densities with a broad mix of unit sizes. This approach would assist in maximising housing numbers across the area and will help to meet housing need. Workspace supports policy direction in Policy BHL1 Housing growth. Workspace supports Policy BHL2, which seeks higher density residential development on sites surrounding Blackhorse Road Station. Workspace supports the flexible approach in Policy BHL3 towards the provision of a range household sizes. Affordable Housing - Workspace objects to Option A as it proposes a rigid approach towards the provision of affordable housing and could undermine the viability of potential regeneration schemes. Workspace considers that this level of affordable provision does not sufficiently take account the risks of delivery as prescribed by PPS3 in paragraph 29. Workspace considers it essential that affordable housing is delivered by a number of bodies and that the Council should not be reliant upon S106 agreements with developers. In order to meet the Council's own targets, a significant proportion of affordable housing will have to be come from other sources such as RSLs, the Council and the HCA. Furthermore, this policy does not appear to be based on an affordable housing viability assessment and as such is contrary to the requirements of PPS3.	Support to policies BHL1-3 welcomed. Support for Option A noted. In terms of affordable housing, as set out in the Preferred Options Paper, Option B is our preferred approach, and is also supported by the findings of the Sustainability Appraisal. Viability will be a key consideration when determining planning applications, as set out in Policy BHL4. It is recognised that the delivery of affordable housing will require partnership working with bodies such as RSLs and the HCA and its successor body.
Mr Neil Kedar, Head of Consents Team (TfL Property) Transport for London	bhlp066	Chapter 03 - Key Policy Areas - Section 3.2 - Housing	Given the high PTAL levels, and in the interests of promoting sustainable development and appropriate locations for particular dwelling types, we strongly agree that higher density developments aiming to provide for young professionals should be focussed around Black horse Road Station.	Support welcomed
Mr Nick Delaney, Legal and General	bhlp099	Chapter 03 - Key Policy Areas - Section 3.2 - Housing	Policy BLH3: Household sizes IPIF supports the indication with Policy BLH3 that dwelling mix will be negotiated on a site by site basis and that site BHL1 is explicitly referred to as an exception from a general approach to seek a high proportion of family housing. IPIF is strongly of the view that this flexibility will be essential to ensure market fit. Policy BHL4: Affordable housing Policy BLH4 states that a target of 50% affordable housing should apply to new developments in the Blackhorse Lane area, subject to viability. IPIF is of the view that the provision for viability testing will be critical. It is noted that there is provision in emerging policy that a developer contribution in lieu be negotiated for sites within the Sutherland Road area and we consider that this flexibility should also be extended to site BHL1, given significant existing provision in the area.	Support for policy BHL3 welcomed. As referred to in policy BHL4, viability will be an important consideration when affordable housing is negotiated on individual cases. Revisions to affordable housing policy in the next iteration of the document will remove requirements for off site contributions; in recognition that recent permissions for largely private schemes has balances out the emerging tenure make-up in the area
Mr Sam Parry	bhlp02	Chapter 03 - Key Policy	I agree that you should focus on " Option B Focus on providing a mixed community", as I believe this will create a more balanced, cohesive community.	Noted. Support for our preferred option is welcomed.



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		Areas - Section 3.2 - Housing		
Ms Kerri Cheek, Senior Borough Programmes Officer Transport for London - Better Routes & Places	bhlp019	Chapter 03 - Key Policy Areas - Section 3.2 - Housing	Agree and support Option B.	Support welcomed.
Nuria Rodriguez	bhlp0133	Chapter 03 - Key Policy Areas - Section 3.2 - Housing	To incorporate mixed size and tenure dwellings in BHL1, BHL2 (North) and BHL8 to prevent creating unsustainable transit communities. Communal gardens at roof and ground level can be created for the use of all. All type of houses, 1, 2, 3, 3+ bed house/flat should have generous size rooms.	As set out in Policy BHL3, a range of household sizes will be required in new developments. A new reference to communal gardens to be inserted to Policy BHL2. References to generous room sizes in 1 and 2 bedroom properties was considered particularly important to emphasise in Policy BHL3 in terms of avoiding an overconcentration of high density, small units that could lead to social problems.
Anthony Pharoah, Senior Planner Rapleys	bhlp073	Chapter 03 - Key Policy Areas - Section 3.3 - Employment	The DPD recognises that there are a significant number of businesses and jobs in the area, and seeks views on how this important employment function can be protected, whilst at the same time, encouraging people to live and spend more time in the area. It also raises the question of how much protection should be afforded to employment areas in the borough. Issues - The Council considers there to be three options in how to achieve this goal. Option A seeks to protect existing businesses, Option B seeks to provide new employment uses within mixed use developments, and Option C proposes distinct zones between residential and industrial uses. It is our view that there needs to be a balance between the three presented options to encourage local businesses and wealth generation, whilst protecting the needs of existing and historical industry in the area. Protection should be offered to other designated employment areas such as Borough Employment Areas (BEAs) set out in the Core Strategy, and expansion encouraged, if they are in an accessible location. Our client supports the general recognition that there are a significant number of businesses and jobs in the area including offices, storage and manufacturing and also a 'growing creative industry sector'. More specifically, it is noted that the Council's Core Strategy designates Waltham Park Way as a BEA. It is suggested that this approach should be maintained, and that it would be appropriate to enhance and improve this employment area through extension of this BEA's boundary to include the Kingfisher Sports Ground. This is because the site is: Adjacent to the existing BEA and represent a logical extension; Highly accessible, and Would allow for the	Preference for a combination of options A, B and C noted. As set out in paragraph 3.3.5, to some extent a combination of approaches will be followed. Development of Kingfisher Sports Ground for employment uses was debated as part of the Core Strategy examination, where it was concluded that the development of this greenfield site was unsustainable when the boroughs future employment needs can be met through redevelopment and intensification of existing sites. In terms of land for employment uses that are not conducive to being located close to residential uses, the SIL designation in figure 5 of the Preferred Options Paper is our preferred location for such proposals. Phrasing of BHL5 to be

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			<p>development of a modern facility for SMEs. We note that the Blackhorse Lane AAP promotes a number of sites for mixed use schemes where SMEs are to be located close to, and within, residential schemes. In this respect, the Council should provide a selection of appropriate sites for new commercial sites that are not conducive to be located close to residential uses. Policy BHL5 Policy BHL5: "Employment" states that the role of Blackhorse Lane as a major employer of local people will be retained and enhanced. Again, it is suggested that this is amended to not solely refer to Blackhorse Lane, but to the Blackhorse Lane AAP. Notwithstanding this, each criteria attached to the policy (relative to our client's interest) are now considered. Criterion A seeks to provide new business units for small/medium and creative industries as part of mixed use developments. Our client supports this intention, but disagrees with the key sites identified within the AAP. The allocated key sites are addressed later in this letter. Criterion B directs general B Class uses to the Borough's Strategic Industrial Locations (SILs). Our client suggests that the uses described in this criterion are also suitably located in the BEAs within the boundary of the AAP, namely Waltham Park Way. In respect of Criteria C, this appears ambiguous and it is not clear what the Council's aspirations are. We disagree with the thrust of Criterion E as many of these sites are constrained by previous outdated locations, layouts and facilities. In contrast, accessible locations which serve the needs of the business, and have good access to the strategic road network should be encouraged, such as the Kingfishers Sports Ground, if development is permitted. Therefore, it is suggested that Policy BHL5 (and the attached criteria) should be amended as follows: Criterion B should also direct general industry to the Council's Borough Employment Areas as well as the Strategic Industrial Locations. Criterion C is ambiguous and should be rephrased to be clear what the Council's aspirations are for other existing employment sites Criterion E should be amended to allow for the development of new sites that can better meet the need of modern SMEs and general industry.</p>	<p>amended to clarify that the policy is referring to the Blackhorse Lane Area, rather than just Blackhorse Lane. Uses to be directed to SIL under part (B) of Policy BHL5 are not considered favourable in Borough Employment Areas, since these uses may compromise opportunities to provide a satisfactory residential environment.</p>
<p>Mark Hayes, Chief Executive Christian Action Housing</p>	<p>bhlp029</p>	<p>Chapter 03 - Key Policy Areas - Section 3.3 - Employment</p>	<p>I support the general stance of policy BHL 5, although I would like to see it strengthened in terms of generating local employment and also discouraging some existing industrial/commercial uses which are incompatible with the overall objective to develop mixed use.</p>	<p>Employment and training of local people is specifically referred to in Policy BHL5, whilst directing uses that are incompatible with mixed use, to land designated as SIL, is set out. To further strengthen our stance on this, additional narrative of the justification of the policy approach will be provided in the Proposed Submission</p>
<p>Michael Polledri, Lee Valley Estates (Agent: Mr Jon Bradburn of Montagu Evans)</p>	<p>bhlp088</p>	<p>Chapter 03 - Key Policy Areas - Section 3.3 - Employment</p>	<p>Employment - We support the Council's approach to incorporate new employment as part of mixed use developments, particularly those uses which have a higher jobs per floorspace ratio. The supporting text for this part of the AAP notes that traditional manufacturing is declining nationally, and Lee Valley Estates has experience of existing good tenants continuing to move away from the area and</p>	<p>Support for mixed use developments welcomed. The 2004 Employment land study is now dated. The more recent 2009 study, and the 2010 Local Economic</p>

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			<p>difficulty in attracting new occupiers. Landowners are also experiencing difficulties in retaining tenants, with public-sector tenants located within the area indicating that they wish to exit their properties within the next two years. This would result in over 700 jobs exiting the area, leaving vast amounts of employment space in a position whereby it is unviable to refurbish or redevelop the site as there are no tenants willing to come to the area. The Council's 2004 Employment Land Study undertaken by CBRE identified that 30% of the employment stock within the Blackhorse Lane areas was no longer fit for purpose, 40% was adequate but needed significant investment and only 30% was considered to be acceptable for functioning as an employment use. Since this time, there has been no investment in the employment properties and the area has continued to decline. With regard to the Unity Works site on Sutherland Road, over 35% of the floorspace is vacant. This supports the Council's 2009 Employment Land Study which notes that the sector has experienced significant decline in levels of employment (45.5% decrease), matched by a reduction in B2 floorspace. The Council have also acknowledged that protecting the existing businesses (Option A) would hinder potential regeneration in the area and the related benefits that new schemes can deliver. They have identified that the option likely to come forward will include the protection of those areas which fall under the GLA's designation of Strategic Industrial Land, and Policy BHL5(b) directs bad neighbour uses to these areas. We do not believe that this should be the case; as noted by the Council, delivering the regeneration benefits of the area will only be possible if sites can come forward for development, or sites will become sterilised. It is however recognised that the Council are bound to this designation by the SIL designation which is imposed by the GLA. It is understood that the GLA are soon to publish the Upper Lea Valley Opportunity Area Framework (OAPF) for consultation, which will review the supply of strategic land within the AAP area and potentially release some or all of the SIL. The AAP must therefore take account of this document, and we therefore propose that Policy BHL5(b) should be amended to state: "B) directing general industrial, storage, manufacturing and distribution uses to land designated as SIL, until such time as this strategic designation is removed. Land which comes forward for consideration ahead of the SIL designation being removed must be accompanied by robust marketing, viability and job creation evidence to support its redevelopment." This additional text will allow those sites within the SIL to come forward for development when the GLA removes the designation without having to amend and reassess the AAP. This would be in line with the Core Strategy which advocates a greater mix of uses than simply B1/B2/B8 in key regeneration areas.</p>	<p>Assessment from the most recent evidence to support the local plan. Lack of investment by landowners could be a contributing factor to growing vacancy levels and should not be rewarded with a more relaxed stance to planning policies. The Area Action Plan has been prepared in alignment with the Upper Lee Valley OAPF. Through these negotiations, land closest to Blackhorse Road station has been removed from its SIL designation, but the remainder has been retained in the interests of providing for a mixed and balanced economy. A relaxed stance to alternative uses within designated SIL will undermine its purpose. Proposed wording indicates a presumption that there will be further SIL designations over the lifetime of the plan, and is therefore rejected.</p>
<p>Mr Ian Dubber, Workspace Group (Agent: Andrew Ransome of Ransome and Company Ltd)</p>	<p>bhlp058</p>	<p>Chapter 03 - Key Policy Areas - Section 3.3 - Employment</p>	<p>Workspace supports Option B, which seeks to incorporate new employment as part of mixed use developments with a focus on mixed use developments that secure employment uses more compatible with residential areas and a higher jobs per floorspace ratio than has been achieved in the past. The support for new creative industries is also supported. Workspace has experienced changes in the types of business activities and the demand for floorspace from the occupants of its property portfolio and has noticed a shift away from the requirement for</p>	<p>Support for Option B welcomed. Whilst it is agreed that Option C as a blanket approach across the AAP area is too rigid, a degree of zoning will be necessary to allow for a balanced economy that retains uses such as manufacturing away from</p>

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			<p>traditional Class B floorspace. There has been a long and well-established trend of decline in the demand for industrial accommodation throughout London. Workspace considers that the protection of existing employment sites for such uses in Waltham Forest will not reverse the ongoing industrial decline. Workspace also supports the move towards promoting more intensive types of employment uses including providing space for creative industries and small and medium enterprises. Small and medium sized enterprises provide an important and significant contribution to the London-wide economy, including Waltham Forest. The potential economic and social benefits of promoting the development of small and medium enterprises include: The creation of jobs at low cost of capital; Contribution to the Gross Domestic Product (GDP); Expansion of the entrepreneurial base; Flexibility to adapt to market changes; Provision of support for large scale enterprises. All the above may never be fully realised without an adequate and encouraging environment and suitable available property in which to develop. Workspace considers the identification of distinct land use zones as cited in Option C is too rigid and does not reflect the compatibility of new employment uses with residential uses within mixed-use regeneration schemes. Workspace agrees with the main focus of Proposed Policy BHL5: Employment, which states that the role of Blackhorse Lane will be as a major employer of local people. Workspace partially supports part (A) of Proposed Policy BLH5 which seeks to provide new B1 units for small/ medium businesses and creative industries as part of mixed use developments in the sites identified in the Key Sites. However, Workspace considers that this policy should be extended further to allow the redevelopment of other employment sites that no longer have a useful economic purpose for mixed-use developments that incorporate flexible space for small and medium sized enterprises. In addition, this policy should include measures that would enable the delivery of accommodation for small and medium sized businesses. In order to provide good value and high quality small and medium sized business units, some existing under-used and vacant sites will require regeneration and renewal to meet the modern and future needs of London's businesses. Such regeneration requires funding and Workspace proposes that if this is to be privately funded, a high-value economic driver will be necessary to enable redevelopment and ensure the overall viability of regeneration. The benefits of this are: The creation of modern business units, which can continue to be provided as good value rental accommodation; The more efficient use of urban land; The retention of the same, if not higher levels, of employment on existing sites; The provision of sustainable mixed-use development; The development of land to assist in meeting the targets and needs of the sub-region; Avoidance of reliance on public funding; The continued support of small and medium enterprises through the provision of modern, good value rental accommodation; The provision of affordable housing if a residential component is included in the scheme, infrastructure services, new business units, supported by higher value units. Without the incorporation of a higher value mixed-use, the existing under-used and vacant sites may become sterilised and potential regeneration benefits lost. This approach is consistent with the principles set out in</p>	<p>residential communities (i.e. land designated as SIL in our adopted Core Strategy). Broad support for BHL5 welcomed. The role of SIL, and how a different approach is necessary to Borough Employment Areas, was considered in detail through the Core Strategy. Through the examination of that document, the Inspector did not consider a more flexible approach to SIL was necessary. The Council's LEA does not advocate the release of SIL at Uplands. Allowing D1 uses in SIL could lead to pressure for incompatible uses such as churches.</p>

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			<p>the Ministerial Statement dated 23rd March 2011 and draft National Planning Policy Framework, which states that local planning authorities should support enterprise and facilitate housing, economic and other forms of sustainable development and that local planning authorities are required to consider fully the importance of national planning policies aimed at fostering economic growth and employment, given the need to ensure a return to robust growth after the recent recession. Workspace objects to part (B) which seeks to direct general industrial, storage, manufacturing and distribution uses to land designated as SIL as it is no longer complaint with emerging national planning policy and does not accord with the Council's Local Economic Assessment 2011. Paragraph 13 of the draft National Planning Policy framework states "The Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth. A positive planning system is essential because, without growth, a sustainable future cannot be achieved. Planning must operate to encourage growth and not act as an impediment". Paragraph 14 of the draft National Planning Policy framework states "At the heart of the planning system is a presumption in favour of sustainable development". A key element of the government's definition of sustainable development as set in paragraph 10 is planning for prosperity (an economic role)'. The definition further states that the planning system should build a strong, responsive and competitive economy, by ensuring that sufficient land of the right type, and in the right places, is available to allow growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure. Paragraph 75 of the draft National Planning Policy framework states "Planning policies should avoid the long term protection of employment land or floorspace, and applications for alternative uses of designated land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses". The Waltham Forest Local Economic Assessment (2010) highlights the change in economic conditions and need for greater flexibility. Section 6.2 of this document states: "Using the continuation scenario, the projected change in land use in the borough is expected to increase in 'softer' less space intensive sectors such as finance, business services and personal services. There is also projected to be less demand for land in manufacturing, utilities, construction and education" "By combining trend business data with trend for land use data, analysis shows gaps between the current demand and levels of supply of commercial space in the borough. There is a clear indication for the need to supply smaller business units going forward, which is consistent with the trend in the business demographic towards smaller business sizes". In accordance with emerging national planning policy and local economic evidence, greater flexibility should therefore be built into the policy to allow economic development and growth within mixed-use developments and avoid the sterilisation of land to the detriment to the local economy. Workspace suggests that a more appropriate policy should be worded as follows: "The Borough's stock of business and industrial premises within the SIL will be monitored and managed to meet economic needs. Surplus stock will be released for mixed-use</p>	

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			<p>development where this secures employment generating development, accommodation for small and medium sized enterprises and the diversification and growth of the local economy". Workspace supports part (C) which seeks to increase jobs numbers on existing employment sites. It is possible to redevelop existing sites with a mix of uses and actually increase employment provision. Workspace partially supports part (D) which allows education and training opportunities for local residents within new, mixed use developments, outside of land designated as SIL. However, Workspace considers that this should be extended to include land designated as SIL. Workspace supports skills training and education provision and considers it important for the development of the local, regional and national economy. Such training is particularly important for the development and growth of small and medium sized enterprises which form the engine of economic growth at a local level and London-wide level. Workspace has experienced an increasing demand for Class D floorspace in employment areas. Recent Government initiatives aimed at training and improving the skills of the workforce has increased demand for on-site training facilities within existing employment areas. These training initiatives often fall within Class D1 and are important for the development of the economy. It is important that these uses are not restricted and consequently should be encouraged on designated strategic industrial locations. It is therefore important that training facilities are provided close to major sources of employment to synergy between business and education. This approach is consistent with PPS4 and draft national planning policy, which states that economic development includes that which provides employment opportunities, generates wealth and produces or generates an economic output or product.</p>	
Mr Sam Parry	bhlp03	Chapter 03 - Key Policy Areas - Section 3.3 - Employment	The designated Strategic Industrial Location below potentially conflicts with the desire to open up the reservoirs. Can industry be retained whilst at the same time providing green routes through it to the reservoirs? Industry currently acts as a barrier to the open space. I support option B below.	The conflict between opening up access to the reservoirs, and the functional needs of industry, are recognised. Consequently, the Station Hub site (key site BHL1) is being released from its Strategic Industrial Land designation to allow for a mixed use development more compatible with better access to the reservoirs. Further releases of remaining Strategic Industrial Land is unlikely to be supported by the Mayor, and undermine our aims of ensuring the areas strong employment function remains
Nuria Rodriguez	bhlp0134	Chapter 03 - Key Policy Areas -	Promote learning opportunities in green jobs that can be used during the developments construction and afterwards, e.g. green roofs design and makers, green building skills, insulation and renewable energy installation, carpentry,	Noted. Point F of Policy BHL5 from the Preferred Options sets out a commitment to employments and

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		Section 3.3 - Employment	furniture making etc.	training. Proposed submission will make clear that this also refers to construction phase.
Mark Hayes, Chief Executive Christian Action Housing	bhlp030	Chapter 03 - Key Policy Areas - Section 3.4 - Neighbourhood Centre	I understand the logic that has produced the location that is proposed in BHL6. However, there are other locations that should be considered before this policy is finalised, including the potential for attractive waterside opportunities that could take advantage of views across the reservoirs	To enhance opportunities for passing trade, retailers will need a prominent location with a road frontage. The western boundary of site BHL1 does not offer extensive views across the reservoirs at ground level, so proposals in the Urban Design Framework instead aim to exploit views to residential uses, whilst also allowing glimpses through the site. In terms of outdoor spaces to provide an attractive environment for cafes etc, it is considered a more useful use of space is to provide courtyards so that buildings can screen traffic from road traffic, as proposed in the Urban Design Framework.
Mr Neil Kedar, Head of Consents Team (TfL Property) Transport for London	bhlp067	Chapter 03 - Key Policy Areas - Section 3.4 - Neighbourhood Centre	We agree that any neighbourhood centre should be focussed in the broad area close to Blackhorse Road Station as shown on figure 6. This will maximise accessibility to any appropriate uses by the local community. Appropriate uses at ground floor could provide a vibrant mix that attracts footfall to the area and provides a range of facilities for all existing and future residents.	Support welcomed
Mr Sam Parry	bhlp04	Chapter 03 - Key Policy Areas - Section 3.4 - Neighbourhood Centre	How will the proposal to turn the Standard into a supermarket affect these plans?	As set out in the Area Action Plan and Urban Design Framework, our plans for the area seek the retention of the Standard Pub and Music Venue, to be incorporated into new developments as part of a mixed use scheme.
Mr Sam Parry	bhlp06	Chapter 03 - Key Policy Areas - Section 3.4 - Neighbourhood Centre	There needs to be a desire to include public space in the shopping environment to enable people to sit outside, drink coffee and spend time in the location.	Agreed. Open spaces and outdoor spaces will be important in helping foster a sense of community and creating an attractive environment. Key site BHL1 refers to public open spaces as part of the preferred use of the Station Hub site, whilst the Urban Design Framework sets out detailed proposals of how parcels of

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				land can come together to form a network of streets that incorporates built courtyards. Such an approach will ensure these spaces are screened from road traffic. To further strengthen the importance of this issue in the AAP, additional wording to be inserted to policy BHL6: Neighbourhood Centre.
Nuria Rodriguez	bhlp0131	Chapter 03 - Key Policy Areas - Section 3.4 - Neighbourhood Centre	To attract and encourage quality of shops, cafes, restaurants and drinking establishment. To encourage and support local and independent business and shops instead of chains of businesses. There is an excellent and inspiring programme developed by the New Economics Foundation to retain wealth in local communities. You might know about it but just in case see link please: <a href="http://www.pluggingtheleaks.org/">http://www.pluggingtheleaks.org/</a>	Noted. Our proposals support the provision of new shops, cafes, restaurants and drinking establishments as part of a new neighbourhood centre. The eventual occupiers of commercial premises is difficult to control, as decisions of principal of development are largely determined by the use class the proposal falls within, and the Council is not the landowner. Policy BHL6 sets out what type of uses we are looking to attract, with the important point being meeting the need of local residents and businesses. In addition, funds have been secured for shop front improvements to existing retail units at the junction of Blackhorse Lane and Forest Road as part of the Outer London Fund.
Jae Shannon	bhlp0114	Chapter 03 - Key Policy Areas - Section 3.5 - Design and Local Character	Nothing should be built above 3 storeys - it will ruin the area to suddenly introduce high buildings	The Draft Urban Design framework advocates a predominantly 3-6 storey development in the area so that the existing built fabric is respected. Such an approach is supported by the Interim Sustainability Appraisal Report. Restricting all developments to 3 storeys is considered an inefficient use of land and would also inhibit viability; thereby stifling regeneration opportunities and possibilities to secure infrastructure



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				improvements.
Mark Hayes, Chief Executive Christian Action Housing	bhlp031	Chapter 03 - Key Policy Areas - Section 3.5 - Design and Local Character	I agree with BHL7	Support welcomed
Mr Ian Dubber, Workspace Group (Agent: Andrew Ransome of Ransome and Company Ltd)	bhlp059	Chapter 03 - Key Policy Areas - Section 3.5 - Design and Local Character	Workspace supports Option A with a focus on new developments that create new landmarks and a distinctive identity and character at key locations. Workspace supports proposed Policy BHL7: Design and local character.	Support welcomed
Mr Neil Kedar, Head of Consents Team (TfL Property) Transport for London	bhlp068	Chapter 03 - Key Policy Areas - Section 3.5 - Design and Local Character	Whilst recognising that future development has to respect the general building heights in the area, we agree with the AAP (section 3.5) that the existing building heights lead to low densities and inefficient use of land. Question 7 refers to restricting building heights to primarily 3-6 storeys, but the question doesn't capture the flexibility provided in 3.5.2 of the AAP which allows for, in the right circumstances, buildings taller than 6 storeys at key locations such as the Station Hub. We appreciate the need for good urban realm and place-making and would strongly support the need for that flexibility of building heights to be retained in the AAP, so long as design quality and a good urban realm are not compromised.	Noted. Design guidance in the Urban Design Framework is that 3-6 storeys can help respect existing building heights and result in a more efficient use of land. As any proposals above this will be contrary to this, very strong justification would be necessary
Mr Nick Bishop, English Heritage	bhlp063	Chapter 03 - Key Policy Areas - Section 3.5 - Design and Local Character	We welcome the production of this AAP which will help manage change in the Blackhorse Lane area and ensure high quality design. While there are only a limited number of heritage assets within the AAP area, the AAP should help ensure that new development is appropriate to its local and historic context. English Heritage has published Understanding Place (2010) to provide further guidance on how this can be achieved. Detailed comments Design and Local Character (page 31): We welcome the conservation approach suggested in paragraph 3.5.1, incorporating existing buildings of merit, but allowing for new development to establish a new character for Blackhorse Lane. However, at the same time, new development and design should integrate well with the existing surrounding residential neighbourhoods. Building heights: The Draft Urban Design Framework identifies Waltham Forest as being primarily of 2 storeys, rather than 3-6, and suggests that clear and demonstrable design reasons should be provided where taller development is considered appropriate. We suggest that this is made clear in paragraph 3.5.2, along with the justification for the 3-6 storeys suggested across the site as a whole. In addition, we suggest that it would be worth identifying and justifying parameters (upper limits) for buildings taller than 6 storeys as suggested at landmark locations. At present this is left unclear. Policy BHL7 Design and local character (page 34): We are concerned that the words "where	Support welcomed. Additional reference to the importance of the character of existing residential neighbourhoods in determining building heights to be added. Enhanced cross references to existing buildings of merit at site BHL1 to be inserted. Guidance on building heights to be revised to make clear that 5-6 storeys should be focussed close to Blackhorse Road Station, and that anything exceeding this will need very strong justification. Viability is an important consideration under the NPPF. It is therefore felt important that reference is made to this in relation to buildings of merit; since they are not offered any statutory protection.

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			<p>viable" in paragraph D could undermine the intended protections afforded by the designation of buildings of townscape merit. The AAP should reinforce this approach, setting out a clear aspiration for their retention. Site BHL1 (page 66): Section 4.2 should identify the 3 buildings of townscape merit which lie within site BHL1 (context section), and set out a clear position on their future as part of its regeneration. Conclusion We hope these comments help strengthen the Blackhorse Lane AAP and we look forward to viewing the next iteration of the document in due course. English Heritage would strongly advise that staff with expertise in heritage matters are closely involved throughout the preparation of the LDF, as they are often best placed to advise on local historic environment issues and priorities, sources of data and consideration of options relating to the historic environment. Finally, we should like to stress that this opinion is based on the information provided by you. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, which may subsequently arise where we consider that these would have an adverse effect upon the historic environment.</p>	
Mr Sam Parry	bhlp07	Chapter 03 - Key Policy Areas - Section 3.5 - Design and Local Character	<p>Are the addresses in the map correct? Spelling error on 57-61 'Blachorse' There also needs to be an emphasis on high quality streetscape - homezones where possible, street trees and areas of landscaping and planting.</p>	<p>The addresses on the map are correct. Mis-spelling of Blackhorse to be corrected. Policies BHL7 and BHL8 from the preferred options together make reference to a network of streets and the need for landscaping within new developments. Nevertheless, additional point to be added to design policy to highlight the importance of a high quality public realm in new developments.</p>
Nuria Rodriguez	bhlp0132	Chapter 03 - Key Policy Areas - Section 3.5 - Design and Local Character	<p>To strictly limit the height of all buildings to 4 stories in all areas including BHL2 (North and South), BHL1 and BHL8. High density around Blackhorse Rd station and in general will only promote unsustainable high and compacted developments. Despite the improvements in the Victoria line the tube is already packed. Public transport will not be able to cope with the amount of residents living in the 2,000 homes you are proposing in the Blackhorse area and the 5,000 proposed for Tottenham Hale.</p>	<p>The Draft Urban Design Framework supports predominantly 3-6 storey developments across the area to make an efficient use of land, enable viable developments that secure infrastructure improvements, and respect the existing urban fabric. The approach is also supported by the findings of the Interim Sustainability Appraisal Report. Attention is also drawn to Policy BHL3 of the Preferred Options Paper, which states that where a significant amount of 1 and 2 bed properties are proposed,</p>

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Anthony Pharoah, Senior Planner Rapleys	bhlp074	Chapter 03 - Key Policy Areas - Section 3.6 - Public Open Space and Nature Conservation	The DPD indicates that whilst there are a range of open spaces within the boundary of the AAP, the area has a largely urban feel. The Council does not recognise the Kingfishers Sports Ground as a site that contributes to open space in the area, albeit, the Council has also identified that some of the outdoor facilities in the area have limited access. Policy BHL8 Much of the policy primarily seeks ways in which new developments should relate or contribute to open space in the AAP. Criterion B seeks to protect existing open spaces, and enhance opportunities to increase public use. As has been previously indicated in representations to the Council's Core Strategy, the Kingfisher Sports Ground has not been used as a sports facility for over 10 years due to a lack of demand. The site is also private land and has not been made available for use to the public so cannot constitute towards public open space in the area. In this respect, our client's site cannot be considered to contribute to open space provision in the AAP or the borough. Figure 8 of the AAP demonstrates that only some of the land surrounding Kingfisher Sports Ground is classed as "access deficient area". These areas cover the industrial sites located on Billet Road and the commercial sites on the east of the A406. In this respect, there are no residential properties near the site that are access deficient, and there is no requirement that can be met by our client's site. The Kingfisher Sports Ground is therefore not required to meet any perceived deficiency in access to play areas. Criterion B of Policy BHL8 should be amended to allow for existing open spaces in the area to be re-used for more efficient uses of land, if they are no longer required or have remained unused for a significant period of time.	<p>generous room sizes should be provided in the interests of securing a high quality scheme.</p> <p>Comments regarding the current status and catchment of Kingfisher Sports Ground noted. The site is designated as green belt. Its open nature is therefore an equally important reason for its continued protection, and redevelopment for employment purposes would be contrary to national planning policy. This issue was considered at the Core Strategy examination, where it was concluded that no change to green belt boundaries was necessary. Given that there is already a lack of open space in the area, and significant opportunities for redevelopment of underutilised brownfield sites, it is not considered necessary to advocate the redevelopment of existing open spaces for alternative uses.</p>
Carmelle Bell, Thames Water Utilities Ltd	bhlp0103	Chapter 03 - Key Policy Areas - Section 3.6 - Public Open Space and Nature Conservation	The Blackhorse Lane Area Action Plan covers a number of Thames Waters key operational sites that are used in connection with the supply of water to London Borough of Waltham Forest and the surrounding area, including: - Coppermills Water Treatment Works - Lockwood Reservoir - High Maynard Reservoir - Low Maynard Reservoir - Warwick Reservoir East - Warwick Reservoir West - Forest Road Borehole & Reservoirs Issues The recognition that Walthamstow Wetlands are an exceptional asset of value in terms of nature conservation and biodiversity is supported. Figure 8: Existing levels of Access to Open Space It is noted that Coppermills Water Treatment Works (WTW) is identified in Figure 8 as an "access deficiency area". Whilst the objective of increasing access to Thames Water's operational reservoir sites elsewhere within the AAP area is supported, it should be noted that opportunities for increasing access to Thames Water's operational Water Treatment Works, including Coppermills WTW may be limited. Thames Water is a key partner and land owner in the Walthamstow Wetlands and the aim of increasing recreational access to the reservoirs and providing for educational facilities is supported. Option B The objective of improving links and opening up access to the Walthamstow Wetlands is supported. Paragraph 3.6.5 The	Support welcomed. Additional text to be added clarifying the functional aspects of the Wetlands. Aspirations to improve public access are not intended to compromise the functional requirements of Coppermills Water Treatment Works

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			recognition that Walthamstow Reservoirs are an internationally designated wildlife habitat and are used by Thames Water in connection with the provision of London's water supply is noted. The recognition at paragraph 3.6.5 that the functional / operational aspects of the reservoirs need to be considered when improving public access is important and is therefore supported.	
Mark Hayes, Chief Executive Christian Action Housing	bhlpo32	Chapter 03 - Key Policy Areas - Section 3.6 - Public Open Space and Nature Conservation	I agree with BHL8 and BHL 9. It would helpful to work up a clear policy as to what A ii) really means in policy BHL8, as 'in keeping' will mean different things to different people	Support welcomed. It is important that policies are not overly prescriptive as this will stifle innovation in the design process. Proposed wording therefore allows for a degree of negotiation as schemes are worked up, although 'respect' may be more appropriate than 'in keeping', so this will be changed in the next iteration of the document.
Mr David Boote, Waltham Forest Footpath Secretary Ramblers' Association	bhlpo22	Chapter 03 - Key Policy Areas - Section 3.6 - Public Open Space and Nature Conservation	Approval of the reference to walking in relation to the importance of public open space in the following : The importance of good quality spaces to the lives of people is increasingly well understood. Access to open spaces can: improve the quality of life and health and wellbeing of local people, by encouraging walking, cycling and leisure/ recreational activities;	Support welcomed
Mr Paul Baker, London Playing Fields Foundation	bhlpo109	Chapter 03 - Key Policy Areas - Section 3.6 - Public Open Space and Nature Conservation	The Foundation is supportive of the general aims of the AAP to enhance the area and to bring about significant improvements during the lifetime of the plan. It recognises that the DESC is a significant site and wishes to work in partnership with the LB of Waltham Forest to bring about long term benefits. The AAP makes direct and indirect reference to DESC and the Foundation wishes to make the following representations: 1. The Foundation is committed to providing facilities for sport and recreation at DESC and is desirous of improving the facilities available and increasing the sporting opportunities available to the local community. 2. DESC could help to achieve some of the objectives contained within the Borough's recently published Playing Pitch Strategy, including: a. Increase the number of junior, small sided and mini soccer pitches by revising setting out of pitches across the site b. Provide a central location for LOASS on a single site. Agreement in principle has been reached with LOASS as part of the Foundation's current plans to improve the artificial pitch and the pavilion c. Provide changing facilities suitable for simultaneous junior and senior use and suitable for women and girls d. DESC could accommodate additional cricket square(s) without loss of football pitches 3. Development could take place at DESC which could increase its sporting capacity, for instance the area adjacent to development site BHL2 South. There is a significant area, including existing tennis courts and a satellite pavilion at the	Support noted. Aspirations for improved facilities and community benefit at Douglas Eyre Sports Complex are welcomed, and considered consistent with Policy BHL8 point (B), and wider local plan policies. It should be noted that the site falls within the Green Belt so any proposals for improved sport offer on the site will need to be consistent with advice contained in national green belt policy. Loss of sports facilities to other forms of development such as housing will be resisted, and it was on the basis of this, and policy support that can be provided for enhanced sports use, that the site has been discounted as a key opportunity

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			<p>northern end of DESC which could be developed in conjunction with the identified plan to relocate Willowfield School onto site BHL2 South. This area could be utilised for sports facilities for the new school and also provide enhanced community sporting opportunities. 4. Development could take place within the DESC site which would not diminish the sporting capacity of the ground, for instance specifically the now unused yard adjacent to Coppermill School could be used for expansion of the school or for other development. 5. We note reference to an extension of the cycle/pedestrian route shown and described as extending south from Forest Road along the Lee Valley relief channel. We note the text at 2.6.6 states that a feasibility study and cost estimate has already been produced. As there has been no consultation with the Foundation we assume this would not impinge on DESC. However it could be that the 'island' part of DESC to the west of the relief channel could be incorporated as part of the Waltham stow Wetlands enhancements. 6. On a matter of accuracy we note at 4.14 that DESC was discounted as a potential development site because of the need to prevent loss of a sports hall. We would point out that there is no sports hall at DESC. There are grass pitches and an artificial pitch served by a pavilion building. There are no indoor sports facilities. There is no prospect of the loss of DESC as a sports ground. The Foundation has plans for improvements to the facilities at DESC and the potential for developments as outlined above would increase rather than decrease the facilities and capacity of the ground and therefore increase the sporting opportunities available. 7. On another matter of accuracy we note that the key to Figure 14 is incorrect and that the figure itself also contains an error. The colour marked as Zone 2 actually relates to Zone 3a, while the colour marked as Zone 3a actually relates to Zone 2. Also the waterways on the map are coloured as Zone 3b. The London Playing Fields Foundation would request that opportunities to develop the facilities at DESC are recognised and included within the Blackhorse Lane AAP for the mutual benefit of the Foundation and LB of Waltham Forest in the improvement of the Blackhorse Lane area and the provision of sports facilities within the Borough.</p>	<p>site. Section on discounted sites to be amended accordingly, and new references to investment to be included in the infrastructure plan. The proposed extension of the cycle/ pedestrian route falls to the west of the flood relief channel. Inaccuracies with figure 14 labelling to be rectified in Proposed Submission.</p>
Mr Sam Parry	bhlp08	Chapter 03 - Key Policy Areas - Section 3.6 - Public Open Space and Nature Conservation	<p>It is a real shame that the waterfront park idea has been abandoned - why is this? That has the potential to spur on further development. I think that more East-West links are needed - not just one new one. New play facilities should follow Play England guidance (<a href="http://www.playengland.org.uk/resources/design-for-play">http://www.playengland.org.uk/resources/design-for-play</a>) As there is a significant deficit of open space in the centre of the AAP area, what plans are there to address this? I feel a new park is needed in this area to address the deficiency.</p>	<p>Previous plans for a waterfront park do not sit comfortably with our aims of ensuring developments benefit the wider community. Such proposals would have failed to realise improved access to the wetlands, and would restrict views to occupiers of dwellings immediately along the waterfront. The redevelopment of the Station Hub can secure one new east-west link. As part of the Walthamstow Wetlands project, we will work with partners to open up further existing</p>

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				access points at Lock Way, Coppermill Lane, and Forest Road. A further map highlighting these will be included in the Proposed Submission. Reference to Play England guide to be inserted into the chapter on Public Open Space and Nature Conservation. Access deficiency in the centre of the AAP area will largely be alleviated by improved access to the Wetlands, and the provision of new open spaces interspersed in amongst new developments, for example, within Sutherland Road, as detailed in the Urban Design Framework.
Mr Stephen Wilkinson, Head of Planning and Regeneration Lee Valley Regional Park Authority	bhlpo94	Chapter 03 - Key Policy Areas - Section 3.6 - Public Open Space and Nature Conservation	Preferred policy BHL8 Open Space and Nature Conservation' provides useful references to improving physical and visual links to the Regional Park and Walthamstow Wetlands (BHL8 A ii)) and the need for new development to provide financial contributions towards such projects (BHL8 A v)). These policy references are supported by the Regional Park Authority. A plan of the Park boundary should be included in this section of the AAP to locate the area referred to in policy BHL8. Policy BHL8 A iii) requires strengthening, to be consistent with the special status of SPA/Ramsar sites. New development that is likely to generate a negative impact on the SPA/Ramsar site should not be permitted. Mitigation should only become an issue if as a result of exceptional circumstances a development is permitted. This is the position set out in the Council's Development Management Policy DM36. The Core Strategy Hearing will also be considering this matter, the issue being potential impacts on the SPA and Ramsar site from the Walthamstow Wetlands project which aims to increase use and access to parts of the reservoir complex. Policy in the AAP will need to align with Core Strategy statements and Development Management Policy Guidance and be in accordance with Planning Policy Guidance 9 It would be useful to include a positive policy statement about encouraging development proposals that will help protect and enhance the ecological integrity of the Lee Valley SPA/Ramsar site across its whole area, in order to sustain the complex of habitats and the levels of populations of the species for which it was classified.	Support for policy BHL8 welcomed. The full extent of Lee Valley Regional Park is substantially larger than the AAP area; extending as far north as Ware. It is therefore not proposed to show the Park in its entirety in the document. Areas immediately surrounding the AAP area will be included though. BHL8 (A) (iii) to be rephrased to clarify that mitigation for harm caused by a development is under exceptional circumstances, since developments that cause harm should not normally be permitted. Additional policy point (D) to be added to support SPA/ Ramsar Site ecological integrity
Ms Candice Beard, Planning Liaison Officer Environment Agency	bhlpo78	Chapter 03 - Key Policy Areas - Section 3.6 - Public Open Space and	We believe that Option C is the best Option because it importantly includes the creation of new green open spaces as well as improving access to new and existing open spaces. Although creating and improving access to open spaces is important it is also imperative that the open spaces are worth visiting and people will enjoy them. Therefore enhancing and creating new green open spaces is just as important. Policy BHL8: Open Space and nature conservation We support this	Support for option C noted. This will form a key strand of our approach as proposals develop (although as referred to in the Preferred Options Paper - there will be a key focus on securing improved access to

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		Nature Conservation	policy, however we have a few recommended additions and changes. iii - avoiding negative impacts on watercourses should be added to this point. iv - creating green corridors along watercourses should be added to this point. Point B should be amended to read, Existing open spaces in the area should be protected and enhanced, and opportunities.....' Point C should be reworded and strengthened. It should read To enhance biodiversity, water quality and public enjoyment, new developments should aim to open up and naturalise the Dagenham Brook.'	existing spaces). Suggested wording changes to be incorporated into proposed submission
Nuria Rodriguez	bhlp0130	Chapter 03 - Key Policy Areas - Section 3.6 - Public Open Space and Nature Conservation	Besides the creation of access to already existing green spaces it is needed the creation of new open green spaces for people to enjoy, meet, play and exercise. Water elements to resemble the water bodies of the marshes could be easily incorporated in the new open spaces by using rain water and at the same time helping reducing flood risk.	Noted. Policy BHL8: Open Space and nature conservation sets out requirements for new open spaces, whilst Policy BHL11 Flood Risk encourages SUDs in new developments. Synergies between these two policies are accepted though, and BHL8 will therefore be amended to highlight how open spaces can serve multiple purposes.
Giles Dolphin, Planning Decisions Unit Greater London Authority	bhlp0193	Chapter 03 - Key Policy Areas - Section 3.7 - Climate Change and Decentralised Energy	On balance, the sustainability, and particularly the energy policies, within the AAP are supported. The AAP addresses the need to actively promote and secure district heating and the Council has acknowledged the Heat Mapping Study, undertaken by the LOA in which Blackhorse Lane has been identified as an opportunity area for decentralised energy.	Support welcomed
Mr Ian Dubber, Workspace Group (Agent: Andrew Ransome of Ransome and Company Ltd)	bhlp060	Chapter 03 - Key Policy Areas - Section 3.7 - Climate Change and Decentralised Energy	Workspace agrees that Policy BHL10, which relates to decentralised energy includes an element of flexibility to take account of the viability of a scheme.	Support welcomed
Mr Sam Parry	bhlp09	Chapter 03 - Key Policy Areas - Section 3.7 - Climate Change and Decentralised Energy	A stronger stance on solar energy is needed in this section.	It is an intention of the planning system that documents should not duplicate each other. As set out in the Preferred Options document, other climate change matters such as insulation and solar energy are dealt with extensively in the Development Management Policies. It is however accepted that better

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				cross referencing in this section of the AAP is necessary and these will be made in the Proposed Submission.
Ms Candice Beard, Planning Liaison Officer Environment Agency	bhlp079	Chapter 03 - Key Policy Areas - Section 3.7 - Climate Change and Decentralised Energy	This section and policy is supposed to help achieve Objective 6, A Sustainable Place. 'To ensure new developments incorporate the highest levels of sustainable design and their impact on climate change is minimised'. However, this section has no reference to sustainable design or climate change, it concentrates only on energy. The use of best practice in design criteria for both residential buildings and commercial properties can significantly contribute towards reducing energy use. Currently, water use accounts for 27% of all carbon emissions from our homes, which by adopting sustainable design principles could be reduced. There needs to be a section and policy to cover sustainable design criteria which mentions the effective and efficient use of resources. This includes the management of water use through for example, reduction of water consumption and (where applicable) maximisation of grey water usage and recycling. Promoting the incorporation of green/brown roofs on sites should also be included. All new residential developments should achieve a minimum water use target of 105 litres per person per day. All new commercial developments should demonstrate that proposals incorporate water conservation measures to achieve the 'excellent' rating under the BREEAM classification. Developments that are being refurbished and converted should demonstrate that water conservation measures have been incorporated. Policy BHL10: Decentralised Energy needs to be expanded to cover additional climate change and sustainable design issues and aims.	The Blackhorse Lane AAP forms part of a wider suite of documents that form the Waltham Forest Local Plan. It is intended that different elements of the Local Plan should not duplicate each other. Sustainable design and construction is addressed in detail in our Development Management Policies DPD. Better cross referencing to such requirements will be added to clarify that these will be important considerations in new developments.
Carmelle Bell, Thames Water Utilities Ltd	bhlp0105	Chapter 03 - Key Policy Areas - Section 3.8 - Flood Risk	The inclusion of the section of Flood Risk within the AAP is supported. By its nature it can be necessary for water and waste water infrastructure to be located close to watercourses and therefore within flood plains. Such infrastructure developments can be classified as "essential infrastructure" or "water compatible" in accordance with PPS25 and as such may be appropriate within Flood Zones 2 or 3. Given the above Thames Water supports Option B in relation to Flood Risk and also supports the inclusion of bullet point E within Policy BHL11: Flood Risk.	Support welcomed
Mark Hayes, Chief Executive Christian Action Housing	bhlp034	Chapter 03 - Key Policy Areas - Section 3.8 - Flood Risk	This seems to a sensible and pragmatic policy	Support welcomed
Mr Neil Kedar, Head of Consents Team (TfL Property) Transport for London	bhlp069	Chapter 03 - Key Policy Areas - Section 3.9 - Transport	We agree with the principle of encouraging car free developments on sites close to Blackhorse Road station, but feel the AAP also needs to acknowledge the potential benefits of car clubs and the need to consider parking for the disabled.	Noted. A reference to car clubs and cross reference to requirements of Development Management Policies, to be inserted.
Mr Patrick Blake, Highways Agency	bhlp064	Chapter 03 - Key Policy	The HA is an executive agency of the Department for Transport (DfT). We are responsible for operating, maintaining and improving England's strategic road	Noted.



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		Areas - Section 3.9 - Transport	network (SRN) on behalf of the Secretary for State for Transport. It is unlikely that there would be a material impact on the SRN from any proposed development in the Area Action Plans, therefore we have no comments at this stage.	
Ms Kerri Cheek, Senior Borough Programmes Officer Transport for London - Better Routes & Places	bhlp020	Chapter 03 - Key Policy Areas - Section 3.9 - Transport	We would broadly support Option B as being the best way to achieve LIP objectives. We broadly support Policy BHL12 as aligning best with achieving the Borough's LIP objectives.	Support welcomed
Nuria Rodriguez	bhlp0135	Chapter 03 - Key Policy Areas - Section 3.9 - Transport	Finally to get the bus 73 running to Walthamstow Central during the day.	Policy BHL12 refers to financial contributions towards proposed improvements in sustainable transport projects. This could include funding towards new or improved bus services in the area. However it should be noted that running a day service for the 73 bus would come at considerable expense, and there is currently a limited amount of public funding available to subsidise. The issue will nevertheless be raised within TfLs review of bus services.
Dr Tristan Moyle	bhlp014	Chapter 04 - Key Sites - Section 4.1 - Site BHL8 - 152/154 Blackhorse Road	would D1 uses enhance the image of the area if this is a key gateway?	The site has in the past been used in part for educational and training uses, which assist in raising the skills and employability of local residents. The intention is that such uses could be compatible as part of a mixed use development that also enables an enhanced appearance of the site.
Jae Shannon	bhlp0118	Chapter 04 - Key Sites - Section 4.1 - Site BHL8 - 152/154 Blackhorse Road	I do not agree with the proposed development at BHL8 - again the road is simply not adequate to take the extra traffic	Given the proximity to the station and key bus routes, it is considered that proposals would include a low level of parking and that most trips generated as a result of the proposal would be undertaken using public transport
Michael Leigh, Chair Blackhorse Action Group	bhlp0202	Chapter 04 - Key Sites - Section 4.1 - Site BHL8 -	BHL8 - the number of residential units is far too high - the development should not exceed 4 storeys	More detailed guidance and justification of building heights and proposed unit numbers will be provided in the Proposed

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		152/154 Blackhorse Road		Submission
Mr Jason O'Malley	bhlp044	Chapter 04 - Key Sites - Section 4.1 - Site BHL8 - 152/154 Blackhorse Road	For me this would be the perfect site for a private gym like Fitness first. Having worked for a similar chain, all the demographic is there. Decent populations in Blackhorse road / west Walthamstow....people who work locally who would go before and after work and all the students moving to Tottenham hale. With the bus links and transport links there is a real opportunity for this to bring something to the area that it doesn't currently have. Cheap flats would give first time visitors a negative impression of the area; but I can't see premium flats working here either.	Noted. Section on Site BHL8 to be amended to set out that leisure uses may also be appropriate
Ortrun Peyn	bhlp0185	Chapter 04 - Key Sites - Section 4.1 - Site BHL8 - 152/154 Blackhorse Road	to accommodate 50 residential units would be too many storeys	More detail on anticipated number of storeys will be provided in the Proposed Submission
Jae Shannon	bhlp0120	Chapter 04 - Key Sites - Section 4.11 - Site BHL9 - Former Essex Arms Public House	I do not agree with the proposed development at BHL9 - again because Forest Road is inadequate for the traffic	See response to comment bhlp0118
Michael Leigh, Chair Blackhorse Action Group	bhlp0204	Chapter 04 - Key Sites - Section 4.11 - Site BHL9 - Former Essex Arms Public House	BHL9 - Tesco will bleed money out of the area and threaten other local businesses - but its a bit late now	The Tesco development has planning permission and has now been built. It has been designed as a relatively small store to meet local need
Katy Andrews	bhlp0221	Chapter 04 - Key Sites - Section 4.12 - Site BHL10 - Gun Site Playing Field, Folly Lane	Site BHL10 is Green Belt land. It is not enough to say 'removal of playing field designation' without a clear policy as to future actual use (and justification). Future use as a playing field would remain an option under the wording you use. WF has a large Muslim population and a woefully inadequate provision of burial sites for followers of the Islamic faith. If this is the intended future use, then why not say so and have a proper consultation about it?	Site BHL10 offers different circumstances to most of the key sites in the AAP. It is not the intention to set out clear development proposals for the site (as is the case with other sites such as the Station Hub and Waterfront). Instead the site is included as there is an anomaly from the old UDP policies that needs rectifying in the local plan, and as the site falls within the Blackhorse Lane AAP

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				boundary, this was considered the most appropriate part of the local plan to do so. Reference to the site will therefore be moved to the policy section in the next iteration of the document.
Anthony Pharoah, Senior Planner Rapleys	bhlp076	Chapter 04 - Key Sites - Section 4.14 - Discounted sites	<p>Key sites BHL4 - BHL8 Key sites BHL4 to BHL8 are promoted for alternative mixed uses that result in the loss of a significant amount of industrial or commercial floorspace. On this basis, the Council makes the presumption that much of the new commercial activity that will be attracted to the AAP will be appropriately sited close to residential areas. It is suggested that other sites should be made available other employment uses that are not appropriate to be near residential areas, but meet the requirements of modern business, and are highly accessible, namely the Kingfishers Sports Ground. Key Site BHL10 The Council is promoting the removal of site BHL10 from it's designation as a playing field' on the basis that it not currently used as a playing field'. The Kingfisher Sports Ground is close to site BHL10, and similarly has not been used for sports activities (for the last 10 years). This is due to a lack of demand for sports pitches and, as such, is considered redundant. It is proposed that the Kingfisher Sports Ground should also be removed from the designation as a playing field'. Discounted Sites - Kingfisher Sports Ground The Council has stated in its reason to discount the site that the site is within Metropolitan Open Land (MOL). This is incorrect. The site is not designated as Metropolitan Open Land. The Core Strategy (currently under examination) does not propose changes to the Proposal Map (as per table A5.2 in Appendix 5 of the Core Strategy -Submission Document). In this respect, the Council should not refer to the site as MOL in its reason to discount the site, or be referred to as such in policy documents going forward. As you have previously been made aware, our client considers that the site should be removed from the Green Belt Playing Field, Green Corridor or Lea Valley Regional Park as it does not meet the purposes for being in any of the designations. In this respect, our client does not consider that each of the designations is appropriate. Green Belt PPG2 Green Belts' and the emerging National Planning Policy Framework (NPPF) allows Green Belt boundaries to be reviewed and altered in exceptional circumstances. We consider that the removal of the site from the Green Belt is appropriate, based on the five criteria as set out in Paragraph 1.5 of PPG2 (which is echoed in the NPPF). In detail, we consider that the site does not meet any of the criteria, and as such, should be allocated as employment land. To check unrestricted sprawl of large built up areas The site is located next to a major road and employment site and has limited ability to prevent the sprawl of built up areas, as it is bounded by the A406. This road acts as a barrier to any sprawl and prevents any further encroachment on the Green Belt. To prevent neighbouring towns from merging into another The neighbouring town' - or in this case, area of development to the north - is separated by Banbury Reservoir, which in itself is a significant physical feature and would prevent any merging of built up areas. To</p>	<p>The redevelopment of Kingfisher Sports Ground for employment purposes is not supported, for the reasons set out in response to comment bhlp074. The situation regarding the Kingfisher Sports Ground is considered different to that of Site BHL10 from the Preferred Options Paper. Whilst both have not been in active use as a playing field in recent years, Kingfisher Sports Ground has not been subject to other implemented uses that preclude future playing field use, as per Site BHL10. Green belt boundaries is a strategic issue that was addressed in the Core Strategy. The examination of that document concluded that no change to green belt boundaries was necessary. To then alter such designations in this AAP would not be in conformity with the Core Strategy. Future references to the site will refer to its green belt designation rather than MOL.</p>

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			<p>assist in safeguarding the countryside from encroachment The site is currently surrounded by built form, with the A406 being to the east, warehousing immediately adjacent to the southern boundary and a driving range and associated developments to the north. The site is in a predominantly urban area, and does not give any feel of being part of the countryside'. In this respect, the land offers no safeguarding of the countryside from encroachment. Accordingly, it does not assist in meeting this purpose of the Green Belt. To preserve the setting and special character of historic towns The site, and this part of the Green Belt, does not offer any protection or preservation to the setting and special character of the urban area. Indeed, the development of the site will give the opportunity to design an employment scheme that has more sympathetic relationship with the Green Belt (i.e. that incorporates landscaping, etc) therefore improving the setting of the town. To assist urban regeneration, by encouraging the recycling of derelict and other urban land It is the intention that this site can provide an excellently accessible location for a modern business space for small to medium sized enterprises, therefore meeting the wider regeneration objectives for the area. Playing fields The site has not been used for playing fields for the past 10 years, and that there appears to be an adequate current supply in the area such as the Wadham Lodge, Hale End Sports Grounds and the park to the south of Billet Road. PPG17 indicates that land can be developed were it is surplus to requirements (Paragraph 10). The Council considers it appropriate to remove other sites (Key Site BHL10) from the 'Playing Fields' designation on the basis that it has not been used as a sports pitch. Lea Valley Regional Park (LVRP) The LVRP aims to increase the range and quality of leisure and amenity provision to inhabitants of Waltham Forest. The site has been disused for the past 10 years and - as private land - does not provide any access for the public in terms of leisure and recreational facilities. The site does not offer any visitor attraction to serve the region and, as such, the site is not considered to form a cohesive sustainable or valued green lung'. Conclusion Our client agrees with the general principle of attracting growth and economic development to the area. It is considered, however, that a balance in the approach to existing and proposed employment sites is required. Sufficient resources should be provided for the existing commercial uses in the AAP and those the Council is proposing to attract. In this respect, allocating the Kingfishers Sports Ground as an extension to the neighbouring BEA would offer considerable benefits. In addition, the site does not offer any benefit being designated as being within the Green Belt, as a playing field, a Green Corridor or as part of the Lea Valley Regional Park. In this respect it is proposed that the site is removed from these designations.</p>	
Carmelle Bell, Thames Water Utilities Ltd	bhlp0107	Chapter 04 - Key Sites - Section 4.14 - Discounted sites	In respect of the Key Sites identified within the AAP it should be noted that development of these sites may need to be supported by additional utilities infrastructure, including water and waste water infrastructure or upgrades to existing networks. Thames Water is aware that water and waste water infrastructure issues are covered in other Waltham Forest DPD documents and in particular the Development Management Policies Document. If the Council does	Noted. A reference to DM Policy 35 and the importance of infrastructure to support development of key sites will be inserted to the Proposed Submission

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			<p>not consider that coverage of water and waste water infrastructure issues is appropriate within the Blackhorse Lane AAP a reference to Development Management Policy DM35 (Water) would be helpful to make it clear that development at the Key Sites will be expected to consider water and waste water infrastructure capacity issues. In relation to the provision of water and waste water infrastructure to support development it will be essential that developers demonstrate that adequate capacity exists both on and off site to serve development proposed and that development would not lead to problems for existing users. In some circumstances this may make it necessary for developers to carry out appropriate studies to ascertain whether the proposed development will lead to overloading of existing sewerage infrastructure. Where there is a capacity problem and no improvements are programmed by the water company, then the developer needs to contact the water authority to agree what improvements are required and how they will be funded prior to any occupation of the development. Where upgrades to existing infrastructure are identified as necessary to serve new development it is essential that these are in place ahead of occupation if adverse impacts such as sewer flooding to property and no/low water pressures are to be avoided.</p>	
<p>Mark Hayes, Chief Executive Christian Action Housing</p>	<p>bhlp047</p>	<p>Chapter 04 - Key Sites - Section 4.14 - Discounted sites</p>	<p>The exclusion of Site 2, Uplands Business Park, is difficult to understand. The retention of the existing buildings on the site will seriously detract from other new developments and undermine the impact of investment in the area. A mixed use development in line with other neighbouring sites would make a positive impact on the neighbourhood. This seems to be a glaring omission in the content of the overall objectives set for the Blackhorse Lane area</p>	<p>As set out in response to comment bhlp029, our intention is to allow mixed use developments in some areas, but in order to provide for a mixed and balanced economy, direct other employment uses incompatible with residential to areas designated as SIL. A mixed use development of Uplands Business Park would compromise these proposals. Furthermore, the AAP does not preclude investment in Uplands Business Park for new employment uses.</p>
<p>Michael Polledri, Lee Valley Estates (Agent: Mr Jon Bradburn of Montagu Evans)</p>	<p>bhlp091</p>	<p>Chapter 04 - Key Sites - Section 4.14 - Discounted sites</p>	<p>Discounted Site 2 - Uplands Business Park We note that this site has been discounted due to its Strategic Industrial Land (SIL) designation which is imposed by the GLA. Consequently, there is little at this stage which the Council can do to facilitate redevelopment for other employment uses. Notwithstanding this, the commentary for the discounted site could be expanded to include some commentary on what may be deemed to be appropriate if the SIL designation is removed. Should the Council include the proposed changes to Policy BHL5(b), this commentary would ensure the site is unnecessarily blighted. As noted above, the 2004 Employment Land Study identified that the quality of stock is in a poor state of repair and there has been no investment since this time. Additionally, public sector bodies including LB Waltham Forest are looking to leave Uplands Business</p>	<p>Given that the SIL designation is unlikely to be removed (having only recently been agreed with the GLA), it is inappropriate to set out what uses would be permissible should such a designation change. The purpose of this section of the document is to set out our reasons for discounting proposals. We will continue to explore opportunities for investment in the area that do not</p>

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			<p>Park which could result in over 700 jobs exiting the area. It is also important for the Council to note within the text for the discounted site that there will be significant viability issues within maintaining the supply of industrial space within this area. Stock within the SIL is already in disrepair, and it will not be viable to develop new space or refurbish space which will attract long term uses which can complement the surrounding redevelopment and replace those jobs which are likely to leave within the next two years. It is therefore important that, as noted above, sites which need to come forward for redevelopment can do so if they are supported by information which supports marketing, viability and job provision.</p>	<p>undermine or conflict with the existing designation. Outer London funding has been secured by the Council, which will offer benefits such as improved signage. Investment by landowners will also be important though.</p>
<p>Mr Ian Dubber, Workspace Group (Agent: Andrew Ransome of Ransome and Company Ltd)</p>	<p>bhlp061</p>	<p>Chapter 04 - Key Sites - Section 4.14 - Discounted sites</p>	<p>Key Sites Workspace objects to the Council's decision to discount Uplands Business Park as a key site for mixed-use regeneration as this decision does not reflect emerging national planning policy, the economics of the area and the condition of the site and as a result there is a danger that this site will become sterilised and hinder economic development progress in this area. It is requested that this site be removed from as a Strategic Industrial Location and instead be allocated as a key site that could deliver significant employment growth for small and medium sized enterprises and additional housing. Site Character Uplands Business Park extends to approximately 4.7ha. The estate is characterised by single storey industrial units built of basic brick and concrete construction and pitched corrugated iron roofs. The existing buildings have become unsuitable for continued use as a business centre. The industrial buildings are characterised by a series on long narrow industrial units that provide poor lighting that creates poor working conditions. The arrangement of the internal space is inefficient for the needs of modern industry. The condition of the building is poor with evidence of concrete spalling and decay to the steel reinforcement. The space is inefficiently used and has reached the end of its economic life. This business complex suffers from poor lighting with reliance upon roof lights. As such this building offers poor working conditions. The building quality has made it become increasingly difficult to achieve a satisfactory level of occupancy. Furthermore the cost of maintaining the site has risen over the past years, which has resulted in an increased service cost being passed onto tenants. The buildings on the site do not contribute positively to the surrounding residential area or the adjacent Lea Valley Regional Park. There is evidence of decay to the structure of these buildings and as such will need to be replaced in the short to medium term. The industrial buildings are clearly visible from Blackhorse Road and are of a design that is out of character of the surrounding area. The site is characterised as being low grade employment accommodation that lacks sufficient demand as emphasised by the high vacancy rates. These employment units have no strategic value and given their condition do not meet the needs of businesses in Waltham Forest or London. Local Economic Conditions The Council's Local Economic Assessment (2011) supports the release of Uplands Business Park from its proposed SIL designation and instead this site should be promoted for mixed-use opportunities that promote small and medium sized enterprises. Section 5.9 of the Local Economic Assessment states: "Large firms (employing 200+) are usually the major drivers of</p>	<p>The status of Uplands Business Park as designated SIL was considered in detail during the recent Core Strategy examination. As part of that process, the Inspector concluded that the designation should remain. Furthermore, the Council's LEA does not advocate the release of Uplands from its SIL designation; which also remains in the London Plan and Mayors OAPF for the Upper Lee Valley.</p>

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			<p>productivity in a local area. While Waltham Forest has a number of large regeneration sites, and strategic industrial locations that could locate new large businesses coming to the area, the potential for such inward investment is viewed by partners are unlikely. The Inward Investment market - particularly for Foreign Direct Investment is risk adverse, and companies will not take a chance on locating to an area without a strong track record as a business location. Significant job opportunities being generated from new large employers coming to Waltham Forest is very unlikely. However, over the long term, if Stratford City can prove itself as a viable business location, then Waltham Forest may benefit from the close proximity of Stratford. The Borough has, however, seen very large job increases in some business services activity, from firms within the borough (particularly the security industry). Indigenous job growth is therefore a possibility". The economic forecasts in Section 6.1 state that there will be long-term declines in manufacturing, transport/logistics, construction and utilities. These are precisely the industries that the SIL seeks to protect. The long and well-established trend of decline in the demand for industrial accommodation in Waltham Forest is set to continue regardless of rigid land use controls. The protection of existing employment sites for such uses will not reverse the ongoing industrial decline. The designation of Uplands Business Park within the SIL would result in the sterilisation of this land to detriment of the local economy of the economic vision of the area. Given that these buildings experience decay and will need to be replaced in the short to medium term, there is a real chance that this site will visual blight this growth area, which could hinder future regeneration opportunities in the wider area. The SIL designation would also conflict with emerging national planning policy and is not sustainable by the definition set out Paragraph 10 of the draft National Planning Policy Framework. Potential Economic Growth The redevelopment of the Uplands Business Park for a mixed-use development has the potential to increase the employment capacity of the site, increase locally generated Gross Domestic Product (GDP), expand the entrepreneurial base, and adapt to market changes. All the above may never be fully realised if the land is sterilised by a rigid SIL designation. This approach is compliant with the draft National Planning Policy framework which states: The planning system should support and encourage sustainable economic growth; Promote sustainable development; Build a strong, responsive and competitive economy; Planning policies should avoid the long term protection of employment land or floorspace, and applications for alternative uses of designated land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses. Uplands Business Park comprises poor quality and low demand economic floorspace that does little to contribute to the wider economy and does not provide the right environment in which to foster sustainable economic growth. Workspace has successfully achieved the redevelopment of an existing industrial area with a mixed-use development that increases the level and quality of employment. Planning permission was granted at appeal on 11th May 2007 for the redevelopment of the Aberdeen Centre, 22-24 Highbury Grove which is located</p>	

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			<p>within the borough of Islington. The planning permission was for a mixed-use development that comprises 72 net additional dwellings and 8,297m2 of commercial B1 uses for small and medium sized enterprises. This represented a net increase in floorspace, job potential and number of dwellings. The re-designation of this site for an employment-led mixed-use will secure increased employment opportunities and economic output from this site. This approach would accord with the Government's proposed definition of sustainable development which includes building a strong, responsive and competitive economy. Summary Workspace is committed to replacing the existing accommodation with a new building that provides suitable and flexible space for tenants to secure the future employment use of the site. Uplands Business Park provides an opportunity to be promoted for mixed-use development to increase the economic output and employment opportunities at this site. Workspace considers it important to maximise the use of redundant and underused land in this area and also increase potential residential capacity. Workspace considers that housing could be promoted as part of a mixed-use development that includes employment space for small and medium sized businesses. A mixed-use development that incorporates a higher value use such as housing is essential to enable the renewal of the estate. If this site is not considered for mixed-use development, then the land may become sterilised and potential regeneration benefits lost. It is essential that this building is replaced with new commercial floorspace that provides up to date specifications that would meet the future needs of tenants and would have a considerably longer economic life than can be achieved by renovation of the buildings. The new employment floorspace will help sustain the existing employment use and will enable sufficient flexibility and building quality to secure its continued use in the longer term. This will provide benefit in employment and economic terms through continuing to provide opportunities for a wide variety of small and medium sized businesses.</p>	
Mr John Newton, John Newton Associates	bhlp054	Chapter 04 - Key Sites - Section 4.14 - Discounted sites	<p>1. Introduction E&amp;R Fuller Ltd. are the owners of the freehold interest in Essex Cordage Works and Sutherland House. The company originated from E.W.J. Fuller and Sons Ltd which was incorporated in Woodbridge, Suffolk in 1797 and was established in Beulah Road, Walthamstow in 1872 from which location it still trades as Fullers (Builders) Ltd. The company was responsible for constructing a number of prominent buildings in Walthamstow such as the Tower Hotel and purchased the Ancient House in 1898, comprehensively refurbishing the latter property between 2000 and 2002. 2. The Buildings Essex Cordage Works and Sutherland House were both purpose built by E.W.J. Fuller and Sons Ltd either side of the Second World War. Essex Cordage Works is a single storey structure having a gross internal floor area (GIFA) of approximately 12,000 sq ft and was built in the late 1930s as a specialist rope and cord making factory. As a consequence it was designed as a linear building with commensurately low eaves height. The original tenants vacated in the early 1960s and until March 2011 the property was occupied by a single tenant trading as Baker Adhesive Labels Ltd. The latter company vacated due to the increasing use of computer related design</p>	Comments noted. Key site BHL4 will be expanded in the Proposed Submission to include Sutherland House and Essex Cordage Works; which the proposals in the Preferred Options Paper seem equally relevant to.



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			<p>in its business and a requirement for greater office and specialist work room space which could not be accommodated or economically created in Essex Cordage Works. The company which employed some 20 people, has relocated to a more modern property in Redbridge. Sutherland House is a three storey building having a GIFA of approximately 36,500 sq ft (lettable 36,146 sq ft) and was built in the immediate post Second World War period for Britains Toys Ltd. who occupied the entire building from 1951-1968 before transferring operations to a new factory in Blackhorse Road. Since 1968 the property has been subdivided into units of varying size and has been occupied mostly on a short term basis. There has typically been a high turnover of tenants particularly for the lift serviced upper floors. The accommodation is arranged and occupied, as follows: Second floor GIFA (sq ft) Tenant and use class Unit A1 2100 Redeemed Christian Church of God - D2 Unit A2 5000 Redeemed Christian Church of God - D2 Unit A3 776 Alden Fittings Ltd. - B1 (c) Unit A4 235 David Gurr - B1 (a) First floor Unit B 4185 Vacant Unit C/D 7388 CTT Ltd. - B1 (c) Unit DA 4185 Vacant Ground Floor Unit E 6144 Vacant Unit F 3875 Vacant Unit G 2750 Cameron Joinery Ltd. - B2 Unit H 150 Vacant. At present the vacant units (B, DA, E, F &amp; H) equate to 18,541 sq ft or just over 50% of the lettable area. The tenants of Units C/D have indicated that they will be vacating at the end of their lease in October 2012 following a merger with another company who hold more modern premises. This will increase the vacancy rate to over 70%. 3. Marketing History 2009-2011. Unit Date vacated Viewings by use class offers B 19.09.09 1 (D2) 0, DA 25.03.10 1 (B8) 1, Unit E 28.07.09 2 (D2 x2) 1, Unit F 29.07.10 0 0, Unit H 28.07.09 &amp; 29.07.10 0 0, ECW 24.03.11 3 (B1 x1 &amp; D2 x2) 0. Messrs Strettons have been marketing units at Sutherland House since July 2002, latterly with assistance from Messrs. Kemsleys who were instructed in March 2011. In addition to standard marketing the properties have been advertised in the May 2011 edition of Estates Gazette and listed in Commercial Property Register. As can be seen, the units at Sutherland House have attracted little interest over the past two and a half years and only one from a Class B1 or B2 user. At Sutherland House there is one offer pending from Messrs Strettons for Unit DA for secure storage use and at half of the previously passing rent. Units F&amp;H have been vacated twice in the past three years. A letting was achieved in July 2009. The tenant was granted the lease subject to obtaining planning permission for Class D2 use but failed to obtain this and instead used the property for holding illegal parties. The lease was forfeited on these grounds and the failure of the tenant to pay rent. Otherwise interest had solely been from those seeking to set up language or engineering colleges. This included an aerospace college at Unit E but the tenant was unable to provide educational references. More recently there has been some interest from artists seeking studio space but the high level of service charge associated with the building as presently configured is a disincentive to small users. Essex Cordage Works has fared a little better but again interest has tended to be from educational users although a luggage manufacturer has viewed but found the property unsuitable due to its poor loading facilities. 2002-2009. Between October 2002 and January 2009 marketing</p>	

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			<p>history was as follows: Units A1 &amp; A2 two expressions of interest in 2003 ultimately leading to the letting to the current tenant in April 2005. Unit B Four expressions of interest in 2003 and early 2004, two each for storage and light industrial/office use producing a short term letting to Messrs Oomers in March 2004. Re-marketing in 2005 produced four expressions of interest, two from Churches and two from light industrial users. The latter proceeded but proved to be a cover for illegal drug manufacture resulting in forfeiture. Lettings were also achieved in this period on and Unit C/D (B1) and Unit G (B2) to the current tenants and also Unit DA for storage (now vacant). 4. Marketing Commentary There are a variety of factors which make these units unattractive to tenants. Essex Cordage Works is designed with a specific use in mind and has relatively low eaves height for a building of this scale and is larger than most prospective tenants require. Sutherland House shares similar problems of design and eaves height but suffers from a number of other disadvantages. In particular the first floor accommodation is served by a limited capacity goods lift; service charges are relatively high due to the age of the buildings, their consequent maintenance intensity and communal heating. Neither building has the benefit of dedicated parking nor loading facilities and both occupy the majority of their respective site footprints. These shortcomings are naturally magnified in a poor economic climate and when there is a considerable oversupply of industrial buildings in both the immediate and general locality. Employment and Regeneration Issues - At present only some 15 personnel are employed at the buildings and half of these are at Unit C/D Sutherland House where the tenants have indicated that they will be vacating in October 2012. Marketing experience shows that there is little demand from traditional employment generating companies who have a wide choice of second hand industrial stock in the general locality much of which is considerably better quality than Sutherland House and Essex Cordage Works. Comparable style units also have better parking and loading facilities and tend to be in purpose built estates rather than on a partially residential road. Marketing experience indicates that the future for Essex Cordage Works as an employment generating use is bleak. To find an employer willing to take on these premises they would at least require re-design to incorporate improved eaves heights and to provide loading and parking facilities and it is difficult to see how this could be accommodated without demolition and reconstruction. However the property would still face the difficulties of access for HGVs on what is essentially a residential approach and competition from the volume of industrial stock available close by, much of it on established industrial estates or business parks. This is before the implications of the latter are considered in terms of development viability. Sutherland House's future is similarly bleak having the further disadvantage of multi-storey accommodation which is poorly served by the original goods lift with its limited capacity. Most probably the future of this building lies in attracting smaller businesses within the wider business community with an emphasis on creative or niche companies. However to attract these the building will require significant modification and modernisation or reconstruction, which could not be viably</p>	

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			<p>supported without a degree of residential use being incorporated. Furthermore many of these prospective new businesses do not sit comfortably within the Town and Country Planning (Use Classes) Order 1987 (as amended) and often trade in a manner which spans different classes. For example an artists studio is likely to require an element of retail and display as well as office and studio/manufacturing facilities. Successful schemes have been achieved in nearby boroughs when developments have incorporated cafe and retail facilities as well as studio, office and display uses and a degree of living accommodation whether pure residential or live/work units. The existing buildings are also unsightly and constitute a harsh transition from the residential part of the road into a starkly industrial landscape which promotes a rather "run down" appearance. Conclusion - In conclusion regeneration of these buildings to create employment and enhance the visual appearance of this part of Sutherland Road is critically dependent upon a planning policy which is flexible enough to encourage the widest possible range of employment generating uses, including a degree of residential use to support refurbishment or redevelopment and enable the visual appearance of the buildings to be improved. Action Area Plan Proposals 1. One of the principal issues set out in para 1.2.5 is a concern over the lack of development activity on key sites since the area was first earmarked for regeneration 2. To this end although this part of Sutherland Road falls within the are shown as industrial character it is not allocated as a strategic industrial location' 3. Sites have been identified as BHL 4, 5 and 6 but this part of Sutherland Road has not been identified as of particular significance. 4. Employment Objective B sets out the aim of mixed use developments being a preferred option and it is considered that this objective should also refer to this site. 5. The AAP also recognises this at para 4.6.9 when considering Sutherland Road as a whole setting out the Councils view that whilst it is still designated as a Borough Employment Area, the Core Strategy allows for a greater mix of uses than simply B1/B2/B8, in recognition that uses such as residential will be necessary to support regeneration in key growth areas. 6. This Justification and that also set out in connection with site BHL6 at para 4.8.5 are considered to be equally relevant and applicable to this site and the approach to new development should reflect these objectives. Planning submissions 1. For the reasons set out in the marketing and valuation report set out above it is unlikely that these premises will be fully utilised in the foreseeable future. 2. Modern industrial and storage users now require more up to date buildings with adequate parking and servicing and in many cases they wish to be located close to a major highway junction and the national road network. 3. These requirements cannot be met on this site and insufficient space is available to provide modern facilities as are now demanded. 4. The Councils objectives of providing local employment opportunities are therefore unlikely to be achieved in the foreseeable future. 5. This site together with that to the east will become isolated from the mixed use development scheme BHL 6 and the residential part of Sutherland Road further to the east. 6. These sites will be in effect a buffer area between the mixed use site and the residential area and uses more compatible with such a transition are</p>	

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			considered to be more appropriate. 7. The extension of the mixed use scheme objectives eastwards to this site will cause no adverse effects and would result in the type of opportunities that the Council have in mind for site BHL 6. 8. Such activities would also minimise any likely disturbance to residents in Sutherland Road itself. 9. It is therefore concluded that the Council should amend the industrial zoning for this part of Sutherland Road to reflect the changing demands of industrial users and the character of the area as a whole, and permit the same mixed use objectives including residential development as set out for site BHL6.	
Dr Tristan Moyle	bhlp015	Chapter 04 - Key Sites - Section 4.2 - Site BHL1 - Station Hub and Waterfront	The Standard building should be demolished and replaced with an attractive open square as it occupies such an important position - there are other ways to preserve links to the past	Given its prominent location next to a major road junction, it is unlikely that an attractive open square could be achieved at this location. Public open spaces will instead take the form of courtyards set back from the road frontage, and the new linear park, as set out in the Urban Design Framework.
Jae Shannon	bhlp0115	Chapter 04 - Key Sites - Section 4.2 - Site BHL1 - Station Hub and Waterfront	I strongly disagree with the development BHL1 near the reservoir - apart from being too dense and no doubt too high, this will definitely affect the habitat of the wildlife - including by the lighting that will change their night time environment	The proposals for site BHL1 are supported by the findings of the Sustainability Appraisal and Habitats Regulations Assessment. Notably the Interim Habitats Regulation Assessment concluded "it does not contain, either through its own policies, or through relation to the Core Strategy, any measures that would be likely to have significant adverse effect on the European sites assessed which are not already addressed by counterbalancing elements of the AAP or the Core Strategy or Development Management Policies DPD"
Michael Leigh, Chair Blackhorse Action Group	bhlp0199	Chapter 04 - Key Sites - Section 4.2 - Site BHL1 - Station Hub and Waterfront	BHL1 - proposed heights and densities are excessive.	Proposed heights and densities are in line with what would be expected in an area with the PTAL rating, and are supported by the advice contained in the Urban Design Framework
Mr Jason O'Malley	bhlp040	Chapter 04 - Key Sites -	The area is in DESPERATE need of a family friendly pub like those seen in Walthamstow village. I am convinced there is the demographic to make a success	Policy BHL6 sets out what uses will be acceptable as part of a new

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		Section 4.2 - Site BHL1 - Station Hub and Waterfront	of such a business. I would also ask the council put in strict conditions about the commercial uses that would be approved. there will be a need for chicken shops I am sure but the area will not be improved if the only shops that open are betting shops and chicken shops.	neighbourhood centre. This makes provision for all town centre uses including shops, restaurants, cafes and drinking establishments. This will be important in helping foster a sense of community within the new developments.
Mr Martin Cornish, Chief Operating Officer Baker Ross Ltd	bhlp025	Chapter 04 - Key Sites - Section 4.2 - Site BHL1 - Station Hub and Waterfront	The plan fails to provide adequate alternative sites for the industrial units on Forest Works. Baker Ross/Yellow Moon provide substantial employment within the Borough and yet no provision is made for the amount of warehousing/office space that we will need when the site is redeveloped and we have to relocate. This issue has already been raised on a number of occasions through the Blackhorse Lane business forum and previously with the Council.	SIL designation covering the Station Hub site has been removed in consultation with the Mayor, to allow for mixed used development that achieve a more efficient use of land at this prominent location. This is also based on the recommendations of our Employment Land Review. The Council acknowledges the valuable role existing businesses play in terms of providing local employment and will work with existing businesses to find alternative sites within the borough. Land to the north of the Station Hub retains its SIL status and may offer scope for relocation of existing businesses. It is our understanding that these leases expire in 2017, so there is no immediate pressure to relocate.
Mr Neil Kedar, Head of Consents Team (TfL Property) Transport for London	bhlp070	Chapter 04 - Key Sites - Section 4.2 - Site BHL1 - Station Hub and Waterfront	Given the extent of our landholdings we can only comment on site BHL 1, and BHL2 North and strongly agree with the range and mix of land uses proposed. We set out more detailed comments below with regard to BHL 1 and the Urban Design Framework, and with regard to BHL2 North would recommend the AAP ensures the operational requirements of LU are properly taken into account in any future proposals.	Support noted. The need to protect the operational requirements of London Underground will be added to this section.
Ms Candice Beard, Planning Liaison Officer Environment Agency	bhlp081	Chapter 04 - Key Sites - Section 4.2 - Site BHL1 - Station Hub and Waterfront	Evidence needs to be provided that the key sites have been Sequentially Tested within the Blackhorse Lane AAP. The sites that fall in Flood Zones 2 and 3 need to be Sequentially Tested to demonstrate that there are no other sites, in the Blackhorse Lane area, with a lower probability of flooding that would be suitable for the type of development proposed, this is in line with PPS25. Site BHL1 - Station Hub and Waterfront If the Sequential Test is passed, it should be noted that there is quite significant flood risk on this site that would need to be addressed in the appropriate way. Additionally, there have been previous discussions about the	Noted. Section on site BHL1: The Station Hub to be added to so that flood risk issues in the area, and reasons for passing the sequential test, are transparent. References to restoring the Dagenham Brook and enhancing the Flood Channel also to be inserted.

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			restoration of Dagenham Brook and enhancement of the Flood Channel. These are the kind of aims that should be achieved through the planning process and should be included within the text for this site.	
Nuria Rodriguez	bhlp0128	Chapter 04 - Key Sites - Section 4.2 - Site BHL1 - Station Hub and Waterfront	To retain the Standard Music Venue as a performing music venue and community music venue and not just as a pub. This will contribute to the much needed cultural offer in the area and can support some of the creative music businesses already based on the Blackhorse Lane area. Additionally it will generate jobs. If you keep the Standard Music venue as a music performance place you'll be loved by the community for ever!	As set out in the Area Action Plan and Urban Design Framework, we would like to see the Standard Pub and Music Venue retained and incorporated into new developments.
Nuria Rodriguez	bhlp0129	Chapter 04 - Key Sites - Section 4.2 - Site BHL1 - Station Hub and Waterfront	To re-design the network of streets in the neighbourhood centre (BHL1) to incorporate outdoor and indoor spaces other than streets, shops and bars for people to interact and better promote community spirit and create a sense of place. This open space could be a focal point as a (green) piazza, (green) square with businesses, cafes etc.	The network of streets set out in the Urban Design Framework includes provision for outdoor spaces including internal courtyards that are screened from road traffic, and the new green link through the site into the reservoirs.
Ortrun Peyn	bhlp0184	Chapter 04 - Key Sites - Section 4.2 - Site BHL1 - Station Hub and Waterfront	Far too many residential units	Blackhorse Lane is identified in the London Plan and our Core Strategy as a key growth area. Due to its proximity to the station, Site BHL1 is considered best placed to accommodate a large proportion of the identified growth. Such a quantum of development here will also help support a new neighbourhood centre
Jae Shannon	bhlp0117	Chapter 04 - Key Sites - Section 4.3 - Site BHL2 North - Car Wash Site	I strongly disagree with the density of the plan for BHL2 North - Forest Road is already over full.	Site BHL2 North is located in one of the most accessible parts of the area, well served by buses, trains and the underground. Higher density development here is therefore considered acceptable in terms of minimising impact on the road network
Michael Leigh, Chair Blackhorse Action Group	bhlp0200	Chapter 04 - Key Sites - Section 4.3 - Site BHL2 North - Car Wash Site	BHL2 North is a recipe for a ghetto and disaster. It is too dense, too single purpose, too high, and too socially exclusive. It violates the spirit and aims of the entire AAP.	It is not the intention that this site will be dominated by high density, high rise, social housing. Mixed use schemes that include a range of housing types and tenures are sought.
Ms Candice Beard, Planning Liaison	bhlp082	Chapter 04 - Key Sites -	Site BHL2 North - Car Wash Site There appears to be a small amount of flood risk on site. If this is the case, this site allocation will need to be Sequentially Tested	Our Level 2 SFRA (produced by Scott Wilson in May 2011) provides

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Officer Environment Agency		Section 4.3 - Site BHL2 North - Car Wash Site	and flood risk should be addressed appropriately at the planning stage. This should be highlighted in the text for this site.	details of flood extents, depths and hazards in the Blackhorse Lane area. Mapping outputs are shown in figure 8.1 on page 53 of that document. These outputs do not indicate that this site falls within an area of flood risk so the application of the sequential test is not considered necessary.
Jae Shannon	bhlp0116	Chapter 04 - Key Sites - Section 4.4 - Site BHL2 South - Blackhorse Road/Hawarden Road	I do not agree with the School being built by the station - BHL2 South - as we have already been told that such a development would include housing and a landmark building - this means more extreme height and dense housing. - There should not be housing within a school compound - there should not be a high building in that area - the surrounding roads are woefully inadequate for the extra traffic, rubbish collections, food deliveries etc	Proposals appear to have been misinterpreted. High density residential on this site was part of earlier proposals when the scheme was earmarked for key worker housing by the Homes and Communities Agency. Proposals for a school supersede such plans
Michael Leigh, Chair Blackhorse Action Group	bhlp0201	Chapter 04 - Key Sites - Section 4.4 - Site BHL2 South - Blackhorse Road/Hawarden Road	BHL2 South should rule out housing	Policy as worded does not support housing development of this site - which was proposed under the now dated IPPF
Ms Candice Beard, Planning Liaison Officer Environment Agency	bhlp083	Chapter 04 - Key Sites - Section 4.4 - Site BHL2 South - Blackhorse Road/Hawarden Road	Site BHL2 South - Blackhorse Road/Hawarden Road There appears to be a small amount of flood risk on site. If this is the case, this site allocation will need to be Sequentially Tested and flood risk should be addressed appropriately at the planning stage. This should be highlighted in the text for this site.	Our Level 2 SFRA (produced by Scott Wilson in May 2011) provides details of flood extents, depths and hazards in the Blackhorse Lane area. Mapping outputs are shown in figure 8.1 on page 53 of that document. These outputs do not indicate that this site falls within an area of flood risk so the application of the sequential test is not considered necessary.
Mark Hayes, Chief Executive Christian Action Housing	bhlp039	Chapter 04 - Key Sites - Section 4.6 - Site BHL4 - Sutherland	Site BHL 4 should be enlarged to incorporate land in Sutherland Road that is not currently considered in the Action Plan. The reason for this is to ensure that the impact of regeneration is not undermined by the retention of poor quality commercial premises adjacent to new developments. A similar policy of mixed use should be adopted, in line with the approach to site BHL4 as currently defined	Boundary of site BHL4 to be amended in Proposed Submission version of document.

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		Road		
Michael Polledri, Lee Valley Estates (Agent: Mr Jon Bradburn of Montagu Evans)	bhlp089	Chapter 04 - Key Sites - Section 4.6 - Site BHL4 - Sutherland Road	Site BHL4 - Sutherland Road We support the Council's wider vision for the land fronting Sutherland Road. We support the commentary on the suitability of the existing uses and the adverse impact they have on the area and neighbouring residential properties. Despite considerable investment by Lee Valley Estates, the area has continued to deteriorate through the way in which the uses have spilled on to the pavement, blocking the road and frequently causing an unsightly, unsafe and unhealthy mass of waste. We do not therefore agree with the Council's statement that: "As a business park is no longer expected at Webb's Industrial Estate (see Site BHL6), remaining industrial land at Sutherland Road should not all be lost to residential" The discussion for Sutherland Road reaffirms the Council's wish to promote good quality employment uses, particularly within the creative industry. The discussion should therefore not state that industrial land cannot be lost, rather, it should state that quality employment space must form part of any proposals to redevelop land currently occupied by employment uses. This will ensure that sites along Sutherland Road can come forward for development, whilst protecting the delivery of good quality commercial units for the area.	Support for broad vision welcomed. Sutherland Road is designated as a Borough Employment Area in the adopted Core Strategy. The importance of protecting the employment function of the area is therefore very important. Suggested changes would weaken this stance
Mr Gary Garber	bhlp0124	Chapter 04 - Key Sites - Section 4.6 - Site BHL4 - Sutherland Road	Now referring to the land that we own, Headbourne House (also known as 22 Sutherland Road), the 2007 IPPF rezoning this land as residential is the best use for this plot for the following reasons: 1. The current building is an inappropriate neighbour to the new residential developments; 2. The use of our building as a "buffer" for new residential developments from the "meat processors" confirms and perpetuates the blight of our property. 3. The existence of residential dwellings on our land will intensify the pressure to resolve the "meat processor" problem. 4. The current jobs in Headbourne House will be lost later this year as the new owner of Headbourne Limited has concluded, much as we had, that it is uneconomic to run the business in a two storey building. 5. The building is not appropriate for the apparent creative industries waiting to move into the area. 6. The only way to make a step change improvement to the area is to replace with residential dwellings. A redevelopment into more appropriate business space would be uneconomic.	Noted. As Headbourne House has now been granted outline permission for residential development the commentary in key site BHL4 will be updated to reflect this position.
Mr Jason O'Malley	bhlp042	Chapter 04 - Key Sites - Section 4.6 - Site BHL4 - Sutherland Road	I can imagine this area becoming like Hackney wick which is a real success. I would like to see an emphasis on increasing the existing artist base and providing cheap rental to ensure they can stay. This will help bring a much needed diversity to the area.	Noted. There are some existing issues in Sutherland Road with employment uses that are not compatible with residential. Our approach as set out in the AAP is therefore to allow mixed use developments, including B1 units for creative industries. This could include spaces for an increased artist base.
Mark Hayes, Chief Executive Christian	bhlp041	Chapter 04 - Key Sites -	This is a sensible policy for the site. The new pedestrian and cycle route is particularly important in securing safe access to the station for residents in the	Support noted. Taken alongside site BHL4, both sides of Sutherland



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Action Housing		Section 4.8 - Site BHL6 - Webb's Industrial Estate	area as a whole, and improving the local environment. This has implications for the land in Sutherland Road that borders this site and is located south of BHL4 (see comments on BHL 4). To implement this policy successfully, further redevelopment of both sides of Sutherland Road is required.	Road are earmarked for redevelopment.
Michael Polledri, Lee Valley Estates (Agent: Mr Jon Bradburn of Montagu Evans)	bhlpo90	Chapter 04 - Key Sites - Section 4.8 - Site BHL6 - Webb's Industrial Estate	Site BHL6 - Webb's Industrial Estate We support the Council's vision for Webb's Industrial Estate. We support the commentary on the need to attract a better quality of employment uses to sit alongside the existing and proposed residential units. Given the site's location towards the centre of Blackhorse Lane, it is agreed that some supporting retailing uses are included within any scheme that comes forward. This will not only support the surrounding residential units, but will help to attract other retailers and service providers to the area that can meet day-today needs of the local community. As noted above, the Council are seeking a financial payment in lieu of all or part of the affordable housing contribution for any scheme that comes forward for this site. Further detail on what is being sought and why a financial payment is preferred would be useful within the AAP document.	Support welcomed. Additional justification of stance on affordable housing to be provided in housing section of the Proposed Submission
Mr Jason O'Malley	bhlpo43	Chapter 04 - Key Sites - Section 4.8 - Site BHL6 - Webb's Industrial Estate	this is the ideal spot for an area of conveniences if it will be the entrance to the wetlands. I would like to see a cafe and a newsagent	The site will not be a direct entrance to the Wetlands, but is instead envisaged to enhance east west links for pedestrians and cyclists through to the Station Hub and Forest Road.
Carmelle Bell, Thames Water Utilities Ltd	bhlpo108	Chapter 05 - Next Steps	Thames Water would expect to be consulted on most major planning applications. Paragraph B4 of PPS12, states that "the adequacy of infrastructure can be a material consideration in deciding whether permission should be granted." The earlier Thames Water is able to be involved in the planning application process the greater the opportunity we have to make known our concerns regarding the ability of the local infrastructure to support development and to ensure any proposed development has no detrimental impact on our assets or the service we provide to existing customers. Furthermore, early consultation allows Thames Water to work with developers and other agencies to enable the issues caused by a development to be mitigated, or a compromise to be reached. When carrying out the necessary early consultations with Thames Water regarding the capacity of water and sewerage systems, adequate time should be allowed to consider development options and proposals so that an informed response can be formulated. It is not always possible to provide detailed responses within a matter of weeks; for example, the modelling of water and sewerage infrastructure systems will be important to many consultation responses and this can take a long time to carry out (e.g. modelling of sewerage systems can be dependent on waiting for storm periods when the sewers are at peak flows).	Noted
Dr Tristan Moyle	bhlpo16	Chapter 05 - Next Steps	where is the specific timetable for all this?	Full details of our timetable for production and consultation on all

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				elements of the Local Plan are contained in the Councils Local Development Scheme, which is available to view on our website.
Giles Dolphin, Planning Decisions Unit Greater London Authority	bhlp0186	Chapter 05 - Next Steps	Thank you for your letter consulting the Mayor of London on the preferred options stage of Waltham Forest Council's DPD document. As you are aware, all development plan documents have to be in general conformity with the London Plan under section 24 (1 )(b) of the Planning and Compulsory Purchase Act 2004. On 11 October 2011 Sir Edward Lister, Deputy Mayor and Chief of Staff, acting under delegated authority, considered a report on this matter, reference PDU/LDF31 /LDD01 /01. The Deputy Mayor has agreed that this report will constitute his representations to the preferred options consultation. A copy of the report is attached, in full. Having considered the report, the Deputy Mayor agrees that although the document is broadly in line with London Plan policy, there are some outstanding matters of general conformity that require further work to ensure the document is sound, and in general conformity with the London Plan. The report summarises the main policy areas. The Mayor will issue his formal opinion on general conformity when requested at the presubmission stage. However, I hope that the policy concerns he has raised at the current stage can be resolved before then, through further informal discussions with Council officers. My colleague Sukhpreet Khull will contact you shortly to arrange a meeting.	Noted
Giles Dolphin, Planning Decisions Unit Greater London Authority	bhlp0194	Chapter 05 - Next Steps	In order for the Blackhorse Lane Area Action Plan to be considered in general conformity with London Plan at the pre-submission stage Waltham Forest Council should amend it to reflect the comments contained in this report. The GLA would welcome further discussions on the document with Waltham Forest Council officers to address the issues raised in this report.	Noted
Jae Shannon	bhlp0123	Chapter 05 - Next Steps	I do not believe that this is the best plan for the area - it is far too dense at over 2,000 new homes, the roads are not adequate, the transport is not adequate, we are overburdening the Lea Valley water supply and the wildlife is not being protected enough. Most alarming of all is the over development planned for BHL1. We should learn from the ugly monstrosity being built near Tottenham Hale.	Noted. Detailed responses provided through comments bhlp0113- bhlp0122. Proposed densities are significantly lower than those near Tottenham Hale
Katy Andrews	bhlp0168	Chapter 05 - Next Steps	I suspect this will come back again before being adopted as part of the LDF. But in case it does not, just to say well done to everyone who has worked on it; lets try to keep building heights down and reduce traffic, and work to make the Wetlands project a success.	Support welcomed
Mr Gary Garber	bhlp0125	Chapter 05 - Next Steps	This response to the Blackhorse Lane AAP Preferred Options and associated planning and design briefs issued in August/September 2011 is made by Gary Garber, June Garber, Gordon Williamson and Elzunia Williamson, the landowners of Headbourne House on Sutherland Road. We were also, until March 2011, the owners of a manufacturing and distribution business operating from Headbourne House for nearly ten years and so have a relevant insight into operating a business in the area. We are limiting our response to the key policy areas that affect site BHL4 - Sutherland Road and the Sutherland Road - Planning and Design Brief.	Proposed submission will make clear the plans for the removal of existing food processing businesses from the area, due to their incompatibility with emerging mixed use developments. The heritage value of traditional industrial buildings in the area has been

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			<p>Amongst all of the documents, the Sutherland Road Illustrative masterplan (page 116 of the design brief) is a key schedule in helping us visualise the proposed policy and supporting design. Regrettably, the key is so badly chosen that it is difficult to interpret. Our response, however, responds to the way we read it. We have two general and fundamental comments to make that are contrary to the proposals or not addressed strongly enough in the proposals: 1. The existence of the "existing food processing businesses that cause odour and other environmental problems" will be a drag on the area for as long as they are allowed to continue to operate. LBWF has not, despite some enforcement action earlier this year, been serious about resolving the fundamental problems. The businesses continue to conduct operations on the public highway, continue to wash down equipment in the street causing animal fats to be carried in the atmosphere and washed down the public sewer. It would be a kick in the teeth to law abiding businesses and property owners should LBWF's only solution be to offer to buy out what I am prepared to call "rogue landlords" (i.e. they have turned a blind eye to the appalling behaviour of their tenants for years) at a premium price to market levels. 2. The 2007 IPPF came to the correct conclusion which was that the poor quality, aging industrial properties on Sutherland Road ought to be replaced by residential property. It is difficult to understand how you could even contemplate retaining the "meat processor" building, albeit with different uses. These buildings are of no industrial architectural heritage value. Further comments, based on the illustrative masterplan referred to above, are: 1. The open space in the final Papermill Place development currently being built is referred to as "private amenity space". The planning approval is for "public amenity space" and should be retained for the public. 2. The best industrial space in BHL 4 is the building that used to house R&amp;S Spares (the laundrette spares and consumables business). The building consists of good warehouse/studio space on the ground floor and modern office provision on the first floor. It was built about six years ago. You propose to demolish this building when you should be looking at retaining this for the apparent creative industries waiting to move into the area. 3. The office building on the north western side of Sutherland Road that is now owned by LBWF is ideal for creative industries. This should be retained and not demolished and turned over to another use. 4. The "private amenity space" within the new residential build on the LBWF owned properties opposite the Papermill Place development should front on to Sutherland Road as a "public amenity space".</p>	<p>identified by design consultants through an assessment of the existing character. Detailed comments relating to the Urban Design Framework to be addressed through future revisions of that document.</p>
Mr Jason O'Malley	bhlp045	Chapter 05 - Next Steps	<p>For me the key things missing are what would be done with the waltham forest business area and the kings family network building. As a young, aspirational individual I see these sites as being the lynchpin to the area - quirky housing taking advantage of the courtyards and foundry next to the wetlands really is a huge opportunity. I would rather see nothing than the wrong type of development put in place. We really should no underestimate how nice a place blackhorse road COULD be to live - the only other area with such great transport links and access to such natural beauty in my opinion is sw london, putney, hammersmith etc. I can see large houses selling well, walthamstow is developing a nice brand (you only</p>	<p>Potential of the area noted. Guidance in chapter on design and local character sets out our aspirations for heritage led regeneration</p>

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			have to look at house prices in the village to see that)	
Mr Joseph Ward, Chairman New Lammas Lands Defence Committee	bhlp0169	Chapter 05 - Next Steps	<p>Further to the meeting (called by the Blackhorse Action Group) with yourself and a colleague attended by the New Lammas Lands Defence Committee (NLLDC) Planning Liaison Officer Katy Andrews, on the evening of Wednesday 5th October 2011. I now write to you on behalf of NLLDC with our comments on the above proposed Area Action Plan. The NLLDC is the successor group to the Leyton Lammas Lands Defence Committee which was elected in 1892. at a public meeting of parishioners at Leyton Town Hall. to represent the interests of the Commoners in the Leyton Lammas Lands. Lammas Rights conferred the right to intercommon grazing beasts on the Walthamstow Common Mead between Lammas Day (1st August) and Lady Day (25th March, the start of the New Year in England until 1752). The current organisation, constituted in 1993, is a cross-borough amenity group based in the Borough of Waltham Forest but having several members living in the Clapton area within the Borough of Hackney. We are affiliated, therefore, to the Hackney Environmental Network and the Lea Valley Federation as well as to Voluntary Action Waltham Forest and the Waltham Forest Civic Society. NLLDC is also formally registered as a Local History Association, and has strong links to the Leyton and Leytonstone Historical Society and the Walthamstow Historical Society. NLLDC are concerned to preserve the historical former Lammas Lands of Walthamstow and Leyton Marshes as green open space, with regard to the recreational, ecological and visual amenity of Waltham stow and Leyton Marshes and of the South and North Millfields recreation ground, all of which are former Lammas Lands and Metropolitan Open Land located within the boundary of the Lee Valley Regional Park (London's "green lung"). Although the Blackhorse Lane AAP is situated mainly in an area which falls outside our "official" remit, we wish to make a representation with regard to the draft proposals. This relates to the fact that our organisation has been represented at the recent Hearings into the Local Development Framework's Core Strategy with regard to several aspects of the draft document, and also to the fact that we have put forward proposals regarding the possibility of the LDF including a Borough-wide approach to the siting of Tall Buildings, and in particular those within and adjacent to areas of green open spaces, and particularly those statutorily designated as "Green Belt" and the equivalent "Metropolitan Open Land." We have also suggested that this policy should also apply in areas adjacent to or affecting open waterways and bodies of open water, in accordance with the principles of the Blue Ribbon Network, which is included within the London Plan. As much of the Blackhorse Lane AAP area is, or is adjacent to, Metropolitan Open Land, open waterways and bodies of water (primarily Walthamstow reservoirs), we felt that our submission in this regard should be reiterated in the particular instance of this Area Action Plan. We understand that the consultation period has been extended until Friday 14th October to allow for further consultation with the Blackhorse Action Group residents' association in the Blackhorse Lane AAP area, and therefore trust that this additional contribution from our organisation will be considered</p>	<p>Our overarching strategy regarding tall buildings is set out in the Core Strategy. Area Action Plans provide more detail based on the local context. So, in the case of Blackhorse Lane, based on an assessment of the existing character, 3-6 storeys is considered appropriate. This does not contradict the Core Strategy, which sets out our stance for the borough as a whole.</p>

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			<p>appropriate. 1. The proposed policies on Tall Buildings in the original Local Development Framework Core Strategy Proposed Submission document, dated January 2011. This policy issue was primarily dealt with in Chapter 18 as Policy CS15 - "Well-Designed Building, Places and Spaces." Sections 18.12, 18.13 and 18.14 dealt with "Tall Buildings" (p.152). The original NLLDC submission - proposing a Borough-Wide policy limiting the height of Tall Buildings within, adjacent to or impacting upon Green Belt. MOL and Blue Ribbon Network sites - was made in manuscript writing, and no electronic copy is available. 2. Text of submission in August 2011 from the New Lammas Lands Defence Committee to the Planning Inquiry Inspector, following a pre-Hearing meeting after post-publication changes to the proposed Core Strategy document as a result of comments made: Hearing 26 September 2011 - Matters and Issues Session: Justification C (Tall buildings) Paper from the Lammas Lands Defence Committee. The Lammas Lands Defence Committee are concerned that buildings within and adjacent to the boundaries of the Lee Valley Regional Park and the boundaries of Epping Forest should be at as low a level as possible in order to afford the least environmental and visual impact of new development, and maintain the prevailing semi-rural character of these important areas. We would also like to see this policy extended to include open water as provided for in the London Plan. Our response to the Inspector's questions on this topic is given below: 1) Tall buildings adjacent to Metropolitan Open Land and Green Belt land The policy in the Core Strategy is not justified because it is weaker than the policy in the UDP 2006, whereas the policy in the London Plan 2004 has been strengthened in the London Plan revision 2011. In the latter "the edge of the Green Belt or Metropolitan Open Land" is mentioned as a "sensitive location" where the impact of tall buildings should be given "particular consideration." Core Strategies CS6 and CS15 say nothing specific about tall buildings adjacent to Green Belt (GB) or Metropolitan Open Land (MOL). The Council, in its existing Unitary Development Plan (UDP) 2002, originally adopted a borough-wide policy that buildings in the vicinity of any Metropolitan Open Land should not exceed 5 (five) storeys. This was quietly dropped when the UDP was updated in around 2006. However, in the existing UDP it is stated, in effect, that erection of tall buildings next to GB or MOL is against Council policy. The Core Strategy leaves open the possibility of allowing tall buildings in 'key growth areas,' which may include sites next to MOL. Specific policies are relegated to area action plans. This contradicts PPS12. It should be noted that the change in the Council's policy is not evidence-based. The Council has produced no evidence that its previous policy was unworkable, neither has it carried out a survey of public attitudes, and neither has it produced evidence of a change in national policy. It may also be noted that none of the representations on the Core Strategy Proposed Submission supported a loosening of policy. The Lammas Lands Defence Committee has been attempting to locate any relevant survey of public attitudes to this subject, and we would hope to make any information we are able to find in this regard available as soon as possible and in any event before the opening of the Hearing on the 26th September. There has</p>	

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			<p>clearly not been adequate time to devise or carry out such a survey afresh, but we will give consideration to some means of gathering evidence of local public opinion over the next four weeks. We respectfully request that, if possible, the results of any such opinion poll be considered in the Core Structure examination. (However, should this not be possible, any results will be used in the Committee's response to consultations on Area Action Plans (and in objections to individual planning applications where appropriate). 2) Tall Buildings adjacent to open waterways. The Mayor's London Plan incorporates a Blue Ribbon Network Policy covering what is and is not permitted alongside London's surface water and open rivers and waterways. The Blue Ribbon Network aspect of the GLA's 'London Plan' should over-ride Borough Plans, but in practice the Blue Ribbon Network is seldom referred to, or given the weight it deserves, in considering Planning Applications. Open waterways "must be set within sustainable limits which prioritise those uses that need a waterside location. The Mayor's approach to the Blue Ribbon Network takes water as the starting point for decision-making. The London Plan states that the uses of the Blue Ribbon Network and the land alongside it should be prioritised in favour of those uses that specifically require a waterside location. Official guidelines within the "Blue Ribbon" policy in the original London Plan stated that the recommendations of the London Canals Committee formed part of the Blue Ribbon Network Policy. Among these recommendations are the Guidelines for Canal-side Development adopted in December 2000 which inter alia laid down that "no new development adjacent to navigable canals or rivers should exceed four storeys in height" and "all such buildings should be sensitively designed to blend with the 'surrounding environment.'" This was, unfortunately, dropped from the Consolidated London Plan 2008 because the London Canals Committee had ceased to exist, having been merged with the London Waterways Stakeholders Committee and subsumed into the new London Waterways Commission which now advises the Mayor of London on waterways and Blue Ribbon Network policies. There is no specific reason for tall residential buildings to be placed adjacent to waterways, neither is there now any specific policy against this in the Consolidated London Plan 2008. It would therefore not be a duplication of current London Plan policy (neither would it be against the London Plan in either spirit or the letter) for these recommendations to be included within the Waltham Forest Local Development Framework as a Core Strategy. The London Plan in fact goes further and states that The Blue Ribbon Network provides many different opportunities for enjoyment, some actively involving the water and others simply benefiting from the calm and reflective feeling of being near water, and points out that both active and passive activities contribute towards improving health. The need for spiritual refreshment grows ever stronger the more densely populated London's urban environment becomes and the less open green space is available to the crowded city-dwellers within it. A presumption against tall buildings along open waterways would be entirely in keeping with this aspect of the London Plan as well as meeting other objectives, such as health, leisure and recreation needs within the Borough. 3. LBWF then submitted, without notice, amended proposals</p>	

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			<p>on its Tall Buildings policy, for incorporation within the Draft Local Development Framework Core Strategy document, following representations from and discussions with English Heritage. These were presented to the LDF Inquiry Inspector at the Hearing on Monday 26th September 2011:- Policy CS15(c) New development proposals will be expected to: A) ensure the highest quality architecture and urban design, both in terms of providing attractive and functional developments. New development should respond positively to the local context and character, improve the way places function and promote distinctiveness and sense of place; B) give strong recognition to local distinctiveness and spatial context within the borough's neighbourhoods in Chingford, Walthamstow, Leyton and Leytonstone and the unique characteristics they present as defined by the combination of common elements such as block structure, urban grain, building typology, street pattern and public realm, building density/height, richness, private and public space and the presence of street trees; C) address issues of height and scale sensitively. Subject to detailed analysis of their impact on local and historic context and other key criteria set out in the English Heritage/CABE guidance tall buildings (defined as ten storeys and above (26 metres above AOD)) may be appropriate in specific sites within the key growth areas of Blackhorse Lane, Northern Olympic Fringe, Walthamstow Town Centre and Wood Street. Appropriate sites will be identified as part of the development of the AAPs. Elsewhere within the borough tall buildings are considered inappropriate. In some limited circumstances, medium rise, taller buildings (defined as between 5-9 storeys (13 - 23 metres above AOD)) may be appropriate both within the growth areas and at other key locations outside of the growth areas, subject to meeting the same criteria above. Appropriate locations for medium rise buildings outside of the growth areas will be identified in the Site Specific Allocations Document, and could include; "gateway" sites or key entrance points into the borough, specific locations at key junctions along principal routes, central areas 01' key junctions within shopping centres and, in areas fronting large areas of open space, subject to there being no detrimental impact on openness and visual amenity. D) reinforce and, where appropriate, create new distinctive and legible areas/spaces based on a design-led approach to redevelopment, particularly in the identified key growth areas; and E) incorporate high quality and inclusive design measures to create an attractive, safe, healthy, accessible and sustainable environment throughout Waltham Forest. Tall Buildings 18.12 The built context of Waltham Forest is essentially one of 2-3 storey development and therefore the appropriateness of tall buildings must be managed sensitively against this backdrop. Accordingly, proposals for tall buildings will only be supported in specific locations where there are no harmful implications on their surroundings. 18.13 The London Plan mentions that boroughs may wish to identify defined areas of specific character that could be sensitive to tall buildings within their DPDs. Although this Core Strategy seeks to encourage high density development in appropriate locations, this does not necessarily equate to a need for tall buildings. Other configurations of a building's mass, scale and form can generate greater floor capacity and</p>	

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			<p>densities. However, in the right locations, tall buildings can contribute to good place-making, provide important urban landmarks and create distinctive skylines.</p> <p>18.14 There is no absolute definition of what constitutes a tall building, although recent CABE English Heritage guidance (July 2007) suggests this as being " ... relevant to buildings which are substantially taller than their neighbours and/or which significantly change the skyline" (para 4.1). This definition is also repeated in the adopted replacement London Plan (July 2011).</p> <p>18.15 The CABE English Heritage guidance also states that "It is clearly the case that a 10-storey building in a mainly two-storey neighbourhood will be thought of as a tall building by those affected, whereas in the centre of a large city it may not" (para 4.1). The Council considers this a useful working definition, and taking into account the built context of the borough, will adopt the following categories of building heights in providing a practical set of criteria for policy purposes and in clarifying its approach to tall buildings; Category 1: Tall buildings - buildings of 10 storeys or more (26 metres above AOD) Category 2: Medium rise "taller" buildings - buildings between 5 - 9 storey&amp; (13- 23 metres above AOD)</p> <p>18.16 Given the built context and character of Waltham Forest, there will be very few locations within the borough where tall buildings (10 storeys and above (height in metres above AOD?)) will be considered appropriate, and then only in very limited and specific circumstances within the borough's key regeneration areas, subject to satisfying the detailed criteria set out in Policy DM32 and the EH/CABE guidance. Elsewhere within the borough tall buildings are considered inappropriate. Medium rise, taller buildings</p> <p>18.17 As regards medium-rise "taller" buildings (Category 2), there may be some limited circumstances both within the key regeneration areas and outside of these areas, where development of this scale may be considered appropriate. In principle, these could for example include, "gateway" sites or key entrance points into the borough, specific locations at key junctions along principal routes, central areas or key junctions within shopping centres and, in areas fronting large areas of open space, subject to there being no detrimental impact on their openness and visual amenity.</p> <p>18.18 However, it is important to note that proposals involving building heights of this scale will require a particularly convincing and robust design case and in many circumstances may still be considered inappropriate.</p> <p>18.19 Fundamentally, all such proposals will need to clearly demonstrate that the criteria set out in the CABE/ English Heritage guidance has been fully addressed. In particular proposals will need to; i) be sensitively related in scale and height to neighbouring buildings, ii) contribute to improving and/or reinforcing local character and townscape, iii) demonstrate no negative impact on established heritage assets and their setting, iv) enhance the qualities of their immediate and wider setting, v) be of the highest standards of architecture and design, and vi) where appropriate, make a significant contribution to local regeneration.</p> <p>18.20 This policy includes a commitment to work with partners to identify particular areas where tall buildings may be appropriate or inappropriate. With regard to the key growth areas, the Council will develop more specific area-based policies on tall buildings supported by evidence. This will be undertaken as part of the proposed Area Action Plans for</p>	



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			<p>Blackhorse Lane, Northern Olympic Fringe, Walthamstow Town Centre and Wood Street. * Note: i) AOD - "above ordnance datum" ii) AOD based on residential floor to ceiling heights of approximately 2.6 metres per floor. 4. Supplementary Paper and Addendum as a further submission, at the Inspector's request, by the Lammas Lands Defence Committee, following presentation of LBWF's amended proposals on Tall Buildings for incorporation within the Local Development Framework Core Strategy document. 5. The proposed policy on Tall Buildings in the Blackhorse Lane Area Action Plan 'Urban Design Framework' document, produced by consultants Maccreehan Lavington, dated August 2011 (p.79):- The UDF proposes a mixed-use predominantly residential neighbourhood based on a network of streets. Buildings [sic] heights are directly related [to] the public space hierarchy in order to create desirable street enclosure and a medium-rise development. Principally the UDF advocates 3-6 storeys with a minimal number of localised high points. High points should be offset from each other in order to ensure that they do not have a detrimental impact on the streetscape or adjoining residential properties. 6. The proposed policy on Tall Buildings in the Draft Blackhorse Lane Area Action Plan 'Preferred Options' document, dated August 2011, Policy 3.5 "Design and Local Character" paragraph 3.5.2 (p.33):- Consistent with guidance in the Draft Urban Design Framework, building heights across the area should be in the region of 3-6 storeys. This will provide opportunities to maximise use of land whilst also enabling existing buildings of merit to be incorporated. At key locations or 'gateway' sites such as the Station hub (Site BHL1 ... ), buildings taller than 6 storeys may be more appropriate. They could then act as landmarks to create distinctive skylines and contribute to good placemaking. 7. NLLDC's response to the Blackhorse Lane AAP 'Preferred Options' document, in the light of the above matters. Much of the policy on building heights seems to depend upon the relative status of the Core Strategy, the Area Action Plans and the Urban Design Framework within the AAPs. There seems to be no over-arching policy within the LBWF Spatial Planning Policy Unit as a whole. The Lammas Lands Defence Committee are in general supportive of limiting development to 3-6 storeys where this is the general built height of the existing urban area. We understand the reasons, in the light of the representations made by English Heritage, for the suggested amendment to the Core Strategy policy on Tall Buildings by instituting a "taller buildings" category of 5-9 storeys in line with recommendations made by CABE. The London Plan initially recommended a 4-storey limit adjacent to open waterways, and this was incorporated into the Blue Ribbon Network, but the policy proved unworkable due to development pressures on the River Thames and was subsequently dropped when the plan was revised, to be replaced by visions and aspirations. As long ago as September 2002, NLLDC was responding to the first Draft London Plan as follows: We support the Blue Ribbon Network inasmuch as it aims to protect riversides and views, but feel that whilst as it stands it is probably adequate for most of the canal system, it does not go far enough in the case of rivers (including the Lea Navigation, which is a canalised river and not a canal as such). It is of some concern, however, that some aspects of this scheme do</p>	

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			<p>appear to see primarily waterways primarily as a "redevelopment" opportunity. This is fine, provided that the rivers and/or canals are taken into account in such redevelopment and where possible enhanced- it is notable that much of the 19th and 20th century industrial and warehousing units along the Lower Lea Navigation and the Bow Back Rivers completely ignore the waterways alongside which they are situated, except for use as a convenient rubbish-dump, and often encroach onto towpaths. There is a need for integration and improvement of towpaths, which are often in an execrable state with flooding, rutting, potholes and badly-maintained cobblestones a frequent problems. Signage along waterways also needs improvement - for example at every river/canal crossing there should be a sign saying what the bridge is called (if it has a name - many do) and those on the towpath should be told what road, railway or path is carried on the bridge and those on the bridge should be told what body of water they are crossing (the latter is often done on the canal system). Despite the motherhood-and-apple pie statements of the GLA's earlier Draft Biodiversity Strategy, and the assurances of 2A.64 and 2A.65, we are unconvinced that Ken Livingstone or some other future GLA administration would not be prepared to change the rules on nature conservation areas and open spaces where this could be used for industrial development. It is interesting, too, that whilst 3D48 states that MOL will be protected the presumption seems to be that any "alterations" will involve loss of MOL. Why are there no proposals to increase the amount of open space with MOL status? We were also a little concerned that although the maps within the London Plan show London's "Strategic open spaces" (predominantly large well-known parks), smaller parks or informal areas used for recreational purposes are not identified in more detailed regional maps. Children need places to play, dogs need space to exercise and excrete, and many people have a deep psychological and emotional need to escape from the bustle of city life to somewhere quiet and natural. These smaller parks serve a vital function in maintaining the health and well-being of Londoners. We hope that the forthcoming London Open Space Hierarchy will give as much weight to these smaller areas of open space as to the larger and better-known ones. High-rise housing should specifically not be permitted alongside MOL or parks, and the presumption in favour of development equally should not apply there - we need a Green Ribbon policy as well as a Blue Ribbon policy. Finally, we note that in the map (4B.I Conservation areas on page 252) nothing is shown at all within LB Waltham Forest, which of course contains a large number of SSSIs - especially within Epping Forest and the Lee Valley Regional Park including a huge Nature Reserve on Walthamstow Marshes, bird sanctuaries of European importance (Walthamstow reservoirs, Essex Filter Beds), and several other Conservation Areas and Sites of Ecological Importance (e.g. Ainslie Wood in Chingford) as well as a Historical Park (Lloyd Park). The map is stated to be based on 1998 data from the London Research Centre, and we are at a loss as to why this information could not have been updated over the last four years in order to show the very considerable extent of such land, especially within Epping Forest and the Lee Valley Regional Park, within LB Waltham Forest, which</p>	

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			<p>includes much of the most important land, environmentally speaking, within the Lee Valley Regional Park area. Our position on this issue has not changed substantially in nearly ten years! We are now faced with trying to respond to various parts of an emerging Local Development Framework where positions and proposed policies seem to be inconsistent with each other and also individually changing all the time, even at this late stage some six months after the Inquiry into the LDF has started. May we suggest that to clarify the situation the broad CABE proposals be accepted, in that there should be a middle range of "taller buildings" (possibly of 5-9 storeys) which could be considered in already-developed areas - and a higher range of 10 storeys and upwards which would be considered generally unacceptable anywhere in the borough. May we further suggest that with regard to the Blackhorse Lane AAP, which is very much on the urban fringe - which consists predominantly of open green and blue space, and where building heights are generally less than 4 storeys - the limit on heights within previously built-up areas should be 6 (rather than 9), with a general presumption towards buildings of 3-6 storeys, as recommended in the Urban Development Framework document. Adjacent to green open space, particularly Green Belt and Metropolitan Open Land, and beside open water, we urge that there be a Borough-wide policy that all building heights should be in the "low" category - i.e. no higher than 4 storeys - in line with the above proposal based on the CABE recommendations. This would seem to us to resolve the two different systems now being proposed within the LDF in such a way as to keep building heights in proportion and thereby minimise the visual, lighting and adverse character impacts of nearby built development on open spaces and waterways. We realise that this is a slightly more restrictive limitation on heights than the five storeys originally suggested by NLLDC in our submissions on the Core Strategy, but feel that it would better fit with the CABE guidance and would also accord with the recommendations of the Blackhorse Lane AAP Urban Development Framework report. We thank you for accepting our late representation.</p>	
<p>Mr Neil Kedar, Head of Consents Team (TfL Property) Transport for London</p>	<p>bhlp065</p>	<p>Chapter 05 - Next Steps</p>	<p>Status of Representation Please note that the following comments represent the views of officers in Transport for London Corporate Finance - Property Development (TfL CFPD) in its capacity as a significant landowner only and should not be registered as the TfL corporate response. They should not be taken to represent an indication of any subsequent Mayoral decision in relation to this policy document. Background Our particular interest in this emerging Area Action Plan (AAP) is the Blackhorse Road LU car park which falls within the spatial scope of the document. In particular, our more detailed comments relate to the associated consultation draft of the Urban Design Framework which we understand provides an evidence base for the AAP. We have been having discussions for some time with LB Waltham Forest (Jimmy Jemal) and your consultants, Maccreeanor Lavington regarding how any potential redevelopment of the LU car park site could make a major contribution to the aspirations of the council for the wider Station Hub &amp; Waterfront area. We fully support the need for the AAP to help maximise the redevelopment potential of this area, particularly</p>	<p>Support welcomed. In terms of the details of any proposals, the Council will continue to engage in pre-application discussions as schemes are worked up to discuss in detail any proposals.</p>

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			<p>given its location within the Upper Lee Valley Opportunity Area, and the associated indicative development capacity contained in the recently adopted London Plan. We acknowledge the difficulties that the Council has encountered in trying to bring forward developments together, and agree that the revised approach will hopefully facilitate redevelopment in a more timely manner, yet retaining the ability for disparate development sites to be developed in a co-ordinated manner to the benefit of the wider area. Blackhorse Lane Urban Design Framework As stated above, we welcome the overall vision to promote appropriate redevelopment of the area, but following on from previous discussions with the planning authority would recommend that a number of issues are addressed in the Urban Design Framework. We have undertaken further design work in relation to the LU station car park site and feel that a more appropriate layout could be accommodated compared to that indicated in the illustrative masterplan. Our proposal, which is set out on the attached plan, allows for a more effective utilisation of the car park site, whilst adhering to the design principles set out in the framework. In arriving at the proposed layout (for illustrative purposes only) we have taken account of key policy considerations and density standards from the London Plan, which are also set out in the Urban Design Framework. The layout shown would incorporate approximately 220 residential units (mix of 1, 2 and 3 bedrooms) as well as an element of ground floor retail commercial leisure (to be determined). We appreciate that the layouts shown in the Urban Design Framework for the Station Hub and Waterfront area are indicative prior to more detailed proposals being drawn up for planning purposes, but we nonetheless feel that the illustrative layout for the LU car park site that we are now proposing will lead to a more realistic guide for what is feasible on the site. We would welcome further discussions with you on our proposals, and would also like to discuss the PTAL analysis included in the Urban Design Framework as we feel that, depending how the TfL tool is used, the site may actually fall within levels 4 and 5, but we will discuss this further with our colleagues here at TfL. Summary TfL CFPD welcome the draft AAP and the accompanying Urban Design Framework. They will act as useful policy tools in establishing an overarching framework to guide future regeneration of the Blackhorse Lane area, including the LU car park site. Our main comment is that we feel the layout of proposals for the LU site shown in the current Urban Design Framework could be updated to reflect the further work we have undertaken to demonstrate what is feasible, whilst respecting the general urban design principles embedded in the Framework. A key objective of both the Government's draft National Planning Policy Framework, Mayoral Policy and the emerging Core Strategy is the delivery of sustainable development. A mixed use development scheme on the site, along the lines of what we have illustrated, in an area well served by public transport, would assist in meeting this objective. Furthermore, early progression would act as a catalyst for further development in the area, thus encouraging economic growth.</p>	
Mr Nick Delaney, Legal and General	bhlpo97	Chapter 05 - Next Steps	I write on behalf of the Industrial Property Investment Fund (IPIF) as the freehold owner of the Ferry Lane Trading Estate. The Trading Estate forms part of the	Support welcomed. Additional justification of our stance on

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			<p>Station Hub and Waterfront (Site BHL1). IPIF is broadly supportive of the content of the emerging Area Action Plan, together with Blackhorse Lane Urban Design Framework which underpins it. The content of both follows a considerable period of dialogue with IPIF and we look forward to continuing to work with the Council as the documents are progressed. We support the approach taken towards the future of the trading estate and its identification as a site suitable for high density, residential led redevelopment. We also support that the documents take a more equitable approach towards the creation of local open space, abandon a previous requirement for a local relief road through the area and allow for the phasing of development. All of these will help to facilitate delivery. It is within this supportive context the following comments highlight the importance of clarity and flexibility on dwelling mix, affordable housing provision and on S106 negotiation. Whilst noting the guidance on building height, IPIF is also of the view that policy should not act to stifle design ambition and the ability to maximise potential.</p>	<p>building heights will be included in the Proposed Submission</p>
<p>Ms Candice Beard, Planning Liaison Officer Environment Agency</p>	<p>bhlpo84</p>	<p>Chapter 05 - Next Steps</p>	<p>In our letter dated 8 April 2011, responding to the original consultation for the Blackhorse Lane AAP, we provided some comments on land contamination and the presence of Inner Source Protection Zones (SPZ 1) in this AAP area. Within the Preferred Option document we can see no reference to land contamination and the need for proposed developments to take SPZ's into account and be sensitive when building on and around them and to ensure contaminated land is remediated. This needs to be included within this document, in a policy and in the text for any key sites that have the potential to be contaminated due to their current or previous use.</p>	<p>Noted. Our policy in terms of ensuring contaminated sites are remediated before re-use is set out in our Development Management Policies DPD (Policy DM25: Environmental Protection). To accord with government policy the AAP should not duplicate other elements of the local plan. Nevertheless, given the industrial nature of the area, it is considered beneficial to insert references to likely contamination, and a cross reference to the requirements of DM Policy DM25. This will be added to the introduction to key sites. It is noted that all sites except BHI10 fall within groundwater source inner or outer protection zones. References to their sensitivity will therefore be added into the introduction to key sites; highlighting that redevelopment can be used as an opportunity to clean up sites and reduce risk.</p>
<p>National Grid (Agent: Damien Holdstock of Entec UK Ltd)</p>	<p>bhlpo110</p>	<p>Chapter 05 - Next Steps</p>	<p>National Grid's high voltage VC overhead electricity transmission line crosses through the south western part of the Blackhorse Lane AAP area. While the line does not cross through any of the proposed key sites or policy areas, the following comments should still be taken into consideration. National Grid does not own the</p>	<p>Noted. No changes to AAP necessary as key sites are not located close to VC overhead electricity transmission line</p>

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			<p>land over which the overhead lines cross, and it obtains the rights from individual landowners to place our equipment on their land. Potential developers of the sites should be aware that it is National Grid policy to retain our existing overhead lines in-situ. Because of the scale, bulk and cost of the transmission equipment required to operate at 400kV National Grid only supports proposals for the relocation of existing high voltage overhead lines where such proposals directly facilitate a major development or infrastructure project of national importance which has been identified as such by central government. Therefore we advise developers and planning authorities to take into account the location and nature of existing electricity transmission equipment when planning developments. National Grid prefers that buildings are not built directly beneath its overhead lines. This is for two reasons, the amenity of potential occupiers of properties in the vicinity of lines and because National Grid needs quick and easy access to carry out maintenance of its equipment to ensure that it can be returned to service and be available as part of the national transmission system. Such access can be difficult to obtain without inconveniencing and disturbing occupiers and residents, particularly where properties are in close proximity to overhead lines. The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. To comply with statutory safety clearances the live electricity conductors of National Grid's overhead power lines are designed to be a minimum height above ground. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site. National Grid seeks to encourage high quality and well planned development in the vicinity of its high voltage overhead lines. Land beneath and adjacent to the overhead line route should be used to make a positive contribution to the development of the site and can for example be used for nature conservation, open space, landscaping areas or used as a parking court. National Grid, in association with David Lock Associates has produced 'A Sense of Place' guidelines, which look at how to create high quality development near overhead lines and offers practical solutions which can assist in avoiding the unnecessary sterilisation of land in the vicinity of high voltage overhead lines 'A Sense of Place' is available from National Grid and can be viewed at: <a href="http://www.nationalgrid.com/uk/senseofplace">www.nationalgrid.com/uk/senseofplace</a> Further information regarding development near overhead lines and substations is available here: <a href="http://www.nationalgrid.com/uk/LandandDevelopment/DDC/devnearohl_final/pdf/ brochure.htm">http://www.nationalgrid.com/uk/LandandDevelopment/DDC/devnearohl_final/pdf/ brochure.htm</a></p>	
Ms Kerri Cheek, Senior Borough Programmes Officer Transport for London - Better Routes & Places	bhlp021	Appendix 1 - Monitoring Table for AAP Policies	Under (7) A Connected Place, we would comment as follows: Alterations are required to the targets quoted (cycling and walking) within the AAP as these do not exactly match those in the draft LIP2, although if these targets are revised in the final LIP they will need to be revised anyway. Contact Neil Bullen or Kevin Burke, Officers at Waltham Forest. Cycling, walking, EV, car club bays and bus services are all supported within this AAP.	Noted. Targets to be amended to align with the LIP2

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Mr Jason O'Malley	bhlp046	Appendix 2 - Monitoring Table for Key Sites	It would be great if space could be created to hold a craft / farmers market on a regular basis. I am planning to organise such an event	Our approach to site BHL1: The Station Hub, is to create a safe network of streets, with internal courtyards, and a new linear park. Securing attractive public realm through new developments may enable future opportunities for community led events in the area.

## Questionnaire Outcomes Blackhorse Lane Area Action Plan Preferred Options

Do you agree with the proposed boundary for the AAP?	Yes	2		No	4
<b>Options</b>	<b>Strongly Agreed</b>	<b>Agreed</b>	<b>Neutral</b>	<b>Disagreed</b>	<b>Strongly Disagreed</b>
Do you agree with the vision?	1	5	0	0	0
Objective 1 - A Neighbourhood Centre.	5	0	2	0	0
Objective 2 - A Place to Live.	4	1	0	2	0
Objective 3 - A Green Place.	6	0	1	0	0
Objective 4 - A Well Designed Place.	6	0	1	0	0
Objective 5 - A Place to do Business and for Creative Industries.	6	0	1	0	0
Objective 6 - A Sustainable Place.	7	0	0	0	0
Objective 7 - A Connected Place.	5	0	2	0	0
Objective 8 - A Community Place.	5	0	2	0	0
<b>Policies BHL1-4 Housing</b>					
A) Developments close to the train station should aim to provide mainly for young professionals, and family units should generally be provided elsewhere in the Blackhorse Lane area.	3	0	1	0	0
B) Higher density developments should be focussed around Blackhorse Road Station.	1	0	1	0	2
C) Financial contributions towards off-site affordable housing should be sought on applications in the Sutherland Road area.	1	2	1	0	0
D) Seeking generous room sizes in schemes with a high proportion of one and two bedroom properties	2	0	2	0	0
<b>Policy BHL5 - Employment</b>					
A) Attracting creative industries and small businesses to the area as part of mixed use developments.	3	1	0	0	0
B) Directing general industrial, storage, manufacturing and distribution uses to land designated as SIL.	3	1	0	0	0
C) Requiring redevelopment of any other existing employment areas to secure an increase in the number of jobs provided on site.	1	2	1	0	0
D) Supporting uses that offer education and training opportunities for local residents within new, mixed use developments, outside of land designated as SIL.	2	1	1	0	0
E) Supporting the refurbishment of existing industrial buildings of architectural merit where viable; to provide new employment space for small and medium businesses.	3	1	0	0	0
F) Securing employment or training of local people as part of new developments; through local labour agreements, jobs brokerage initiatives, or financial contributions towards wider employment and training initiatives.	3	0	1	0	0
<b>Policy BHL6 – Neighbourhood Centre</b>					
A) That the neighbourhood centre should be focussed in the broad area close to Blackhorse Road Station as shown on figure 6.	2	3	0	0	0



Options	Strongly Agreed	Agreed	Neutral	Disagreed	Strongly Disagreed
B) That A1 uses (shops) should be encouraged.	2	3	0	0	0
C) That A3 uses (restaurants and cafes) should be encouraged.	2	3	0	0	0
D) That A4 uses (drinking establishments) should be encouraged.	1	1	2	0	1
E) That D1 uses (non-residential institutions, e.g. health centres) should be encouraged.	1	2	2	0	0
F) That retail stores should have a maximum net floor area of 1000m2.	0	2	1	0	2
<b>Policy BHL7 – Design and Local Character</b>					
A) To protect and incorporate existing buildings of merit into new developments where viable.	3	1	1	0	0
B) To restrict building heights to primarily 3-6 storeys.	1	1	0	1	2
C) To seek high standards of design that respond to local character and context.	4	0	0	0	0
<b>Policy BHL8 – Public Open Space and Nature Conservation</b>					
A) The quality of, and access to, existing open spaces should be enhanced.	4	1	0	0	0
B) A greener environment should be at the heart of new development proposals.	3	2	0	0	0
C) Harm to biodiversity should be avoided and measures to enhance biodiversity in new developments should be sought.	3	2	0	0	0
D) A new east- west link through the Station Hub.	2	2	1	0	0
E) Improved pedestrian and cycle links down to the Olympic Park.	1	2	2	0	0
<b>Policy BHL9 – Walthamstow Wetlands</b>					
A) Securing improved public access to Walthamstow Reservoirs, whilst ensuring the areas biodiversity value is not compromised.	4	1	0	0	0
B) Refurbishing the Marine Engine House to provide a new Wetland Centre for visitors.	3	1	0	1	0
C) Enhancing the physical appearance of Forest Road as a key gateway.	1	3	1	0	0
D) Pooling funding from a range of sources, including developer contributions where appropriate.	1	3	1	0	0
<b>Policy BHL11 - Flooding</b>					
A) New developments should be designed and sited to minimise flood risk to existing and new communities.	3	1	0	0	0
B) Basement dwellings should be resisted.	3	1	0	0	0
C) New development opportunities should be viewed positively as a way of minimising existing risk of surface water flooding, using mitigation measures set out in a Site Specific Flood Risk Assessment.	3	1	0	0	0
<b>Policy BHL12 - Transport</b>					
A) New developments should incorporate streets for all users.	2	1	0	0	0
B) Priority should be given to pedestrians and cyclists.	3	2	0	0	0
C) Enhanced pedestrian and cycle access to Lee Valley Park should be sought.	4	1	0	0	0
D) New developments should help fund sustainable transport projects, such as improvements to the Standard Junction.	3	2	0	0	0
E) Encourage car free developments on sites close to Blackhorse Road Station.	5	0	0	0	0

Options	Strongly Agreed	Agreed	Neutral	Disagreed	Strongly Disagreed
<b>Policy BHL13 – Social Infrastructure</b>					
A) That health, education, and green public open spaces are the highest priority elements of social infrastructure for the area.	1	1	2	0	0
B) That we should seek to incorporate or replace the Standard Pub in the redevelopment of the Station Hub site.	0	4	0	1	0
C) Resisting the loss of key social infrastructure in new developments.	3	1	1	0	0
<b>Implementation</b>					
A) Improved pedestrian links across the Standard Junction.	4	1	0	0	0
B) New physical links into Walthamstow Wetlands/ Lee Valley Regional Park.	3	2	0	0	0
C) Environmental enhancements to Forest Road as the gateway access into Walthamstow Wetlands.	3	2	0	0	0
D) The extension of the Lee Valley towpath to the Olympic Park.	1	3	1	0	0
E) The provision of new education and health facilities.	2	3	0	0	0
<b>Key Sites</b>					
Site BHL1 (Station Hub and Waterfront) for mixed use, incorporating approximately 1000 new homes and 7500m2 of commercial space, a new linear park, and public open spaces.	1	2	0	0	2
Site BHL2 North (Car Wash Site) for mixed use, incorporating ground floor commercial units and approximately 100 residential units above.	1	2	0	0	2
Site BHL2 South (Blackhorse Road/ Hawarden Road) for a new secondary school.	2	1	1	0	1
Site BHL3 (Willowfield School) for education uses.	2	1	2	0	0
Site BHL4 (Sutherland Road) for mixed use, incorporating approximately 150 homes, a medical centre, and B1 units for creative industries.	1	1	3	0	0
Site BHL6 (Webb's Industrial Estate) for mixed use, incorporating 250 homes, space for small businesses, small local convenience shopping, and community uses.	2	0	3	0	0
Site BHL7 (Billet Works) for approximately 500 homes, compatible B1 employment uses, social infrastructure, and small scale retail.	1	1	3	0	0
Site BHL8 (152/154 Blackhorse Road) for ground floor commercial uses with approximately 50 residential units above.	2	0	1	1	1
Site BHL9 (Former Essex Arms Public House) for mixed use incorporating residential and social infrastructure or small scale convenience retail (i.e. less than 500m2).	1	2	1	0	1
Site BHL10 (Gun Site Playing Field) removal of playing field designation.	1	0	2	0	2
Site BHL11 (Higham Hill Local Retail Parade) for retail uses, particularly A1 uses.	1	2	2	0	0



**Waltham Forest**

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