

# Waltham Forest Local Plan Supporting Document



## Blackhorse Lane Area Action Plan Consultation Report

Part I – Summary of Representations on the Blackhorse Lane  
Area Action Plan Proposed Submission and Council's  
Response

Regulation 22(1)(e)

February 2014

## INTERPRETING AND TRANSLATION ASSISTANCE

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<p>Dokumenti apo përmbledhja e tij mund të sigurohen në gjuhë tjera, shtyp të madh, Braille, audiokasetë apo i përkthyer sipas kërkesës. Nëse ju keni nevojë për këto shërbime, ju lusim na kontaktoni në adresën e dhënë më poshtë.</p> <p style="text-align: right;">Albanian <input type="checkbox"/></p>	<p>આ અહેવાલ કે એનું સંક્ષેપ બીજી ભાષાઓમાં, મોટા અક્ષરોમાં, બ્રેઈલમાં, ઓડિયો ટેપ પર અથવા ભાષાંતર સેવા દ્વારા ઉપલબ્ધ થઈ શકે છે. જો તમને આ સેવાની જરૂર લાગે, તો કૃપા કરીને અમને નીચેના સરનામે સંપર્ક કરો.</p> <p style="text-align: right;">Gujarati <input type="checkbox"/></p>
<p>يمكن توفير هذه الوثيقة أو ملخصها بلغات أخرى أو بالطبعة الكبيرة أو بلغة بريل أو على الشريط. ويمكن توفير خدمة ترجمة عند الطلب. وإذا احتجت منالاً من هذه الخدمات الرجاء الاتصال معنا على العنوان المذكور أدناه.</p> <p 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>İstekte bulunursanız, bu broşürü ya da broşürün özetinin Türkçesini size gönderebiliriz. Ayrıca broşürün iri harfli baskısı, görme engelliler için parmak ucuyula 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 دیے 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**

**1.1** This report for the representations on the Blackhorse Lane Area Action Plan Proposed Submission is divided into three separate parts:

Part I - Summary of Representations and Council's Response under Regulation 22(1)(e) **(this document)**

Part II - Schedule of Full Representations under Regulation 22(1)(e)

Part III - Copies of all representations on the Proposed Submission under Regulation 22(1)(d)

**1.2** In accordance with Regulation 22(1)(d) of the Town and Country Planning (Local Planning) (England) Regulations 2012, copies of all representations received during the 6-week consultation of the Blackhorse Lane Area Action Plan Proposed Submission from 18 March 2013 to 29 April 2013 are included in this part

## **Other Consultation Reports**

**1.3** The following reports are also relevant to the consultation on the Development Management Policies Proposed Submission:

**Statement of Consultation under Regulation 22(1)(c)(i-iv)** - setting out how the London Borough of Waltham Forest has complied with the consultation requirements regarding the following:

- the bodies and persons invited to make representations
- how those bodies and persons were consulted
- a summary of the main issues raised by the representations
- how the representations made were taken into account.

**Summary of Main Issues** raised by representations on the Proposed Submission under Regulation of 22(1)(c)(v)

**Schedule of Post Publication Minor Changes** - setting out proposed changes in response to the representations received during the consultation on the Proposed Submission.

**List of Respondents to Blackhorse Lane Area Action Plan Proposed Submission**

<b>Respondent ID</b>	<b>Respondent</b>	<b>Representation ID</b>	<b>Submission Type</b>
537451	BT Openreach (Mr Mick Sharpe)	Bhlps11	Letter
745279	Canal and River Trust (Mrs Claire McLean)	Bhlps2	Web
682134	E and R Fuller Ltd (Agent: Mr John Newton, John Newton Associates)	Bhlps26	Representation Form
441261	English Heritage (Mr Nick Bishop)	Bhlps19	Letter
680877	Environment Agency (Miss Eleri Randall)	Bhlps4	Representation Form
534011	Greater London Authority (Ms Sukhpreet Khull)	Bhlps56-64	Letter
760706	Highways Agency (Ms Felicity Drewett)	Bhlps9	Email
760974	Hollivale Blackhorse Lane LLP (Agent: Miss Jane Richardson, BPTW Partnership)	Bhlps20-25	Representation Form
682192	Industry Property	Bhlps27-35	Representation Form

	Investment Fund (Agent: Mr Tudor Jones, GVA)		
150955	Lee Valley Estates (Agent: Mr Simon Marks, Montagu Evans LLP)	Bhlps14-17	Representation Form
183754	Lee Valley Regional Park Authority (Mr Stephen Wilkinson)	Bhlps48-55	Representation Form
760701	London Underground Ltd (Shahina Inayathusein)	Bhlps8	Letter
732145	Marine Management Organisation (Ms Angela Atkinson)	Bhlps10	Letter
150911	National Grid (Agent: Mr Julian Austin, Amec)	Bhlps18	Letter
336234	Natural England (Ms Kate Wheeler)	Bhlps12	Letter
556058	Sam Parry	Bhlps3	Web
151002	Thames Water (Agent: Mr Phil Jameson, Savills UK)	Bhlps5-7	Representation Form
761267	Transport for London (Mr Andrew	Bhlps36-39	Representation Form

	Maunder)		
183298	Workspace Group PLC (Agent: Mr Tudor Jones, GVA)	Bhlps40-47	Representation Form

**Summary of Representations and Council’s Response on the Blackhorse Lane Area Action Plan Proposed Submission  
(62 Representations from 19 consultees)**

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not	Summary of Representation	Council’s Response	Outcome	Oral examination
537451	BT Openreach (Mr Mick Sharpe)	bhpls11	Introduction	Not specified	Not specified	Not specified	Request consultation on planning applications	Noted - will be consulted on relevant applications	No change	Not specified
745279	Canal and River Trust (Mrs Claire McLean)	bhpls2	Introduction	Yes	Yes	Not specified	Document supported	Noted	No action required	No
682134	E and R Fuller Ltd (Agent: Mr John Newton, John Newton Associates)	bhpls26	Site BHL4 South - Sutherland Road	Yes	No	Effective; Consistent with national policy	Provision should be made for taller building heights and a greater proportion of residential development at site BHL4 South	Section 4.1 makes clear that a degree of flexibility may be necessary in terms of uses and densities on individual sites, but that where done so developers will need to justify on the basis of the benefits their proposal will bring, and support it with viability evidence. It is accepted that the mix between B1 and residential units may require separate blocks rather than restricting B1 uses to ground floors of the development site.	Rephrase preferred land use on page 104 to read: “A mixed use development with 1940m2 B1 use, 140m2 retail space, approximately 200 residential units, and retained community uses.”	No
441261	English Heritage (Mr Nick Bishop)	bhpls19	Introduction	Not specified	Not specified	Not specified	English Heritage have no comments on the AAP	Noted	No change	Not specified
680877	Environment Agency (Miss Eleri Randall)	bhpls4	Policy BHL11: Flood Risk	Yes	Yes	Not specified	Policy supported	Noted	No action required	No
534011	Greater London Authority (Ms Sukhpreet)	bhpls56	Introduction	Not specified	Not specified	Not specified	Background to GLA report on AAP	Noted	No change	Not specified

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	Khull)									
534011	Greater London Authority (Ms Sukhpreet Khull)	bhlps64	Introduction	Not specified	Not specified	Not specified	Legal considerations and conclusion from GLA report on AAP	Noted	No change	Not specified
534011	Greater London Authority (Ms Sukhpreet Khull)	bhlps57	Introduction	Not specified	Not specified	Not specified	<p>Would be useful for document to include better signposting to other DPDs, and the AAP should be more visionary and ambitious in terms of the scale of development proposed</p>	<p>Following the meeting between the Council and the GLA on the 27/09/13, it is understood that the GLA do not object to the quantum of development either put forward in the AAP, or the densities coming forward on recent schemes within the area. Instead, the key point is that the AAP should not be a barrier to ambitious growth or stifle the opportunity for change in the area.</p> <p>The Council is of the view that as drafted the AAP is a pro-growth document. Policy BHL1 indicates a presumption in favour of sustainable development, Policy BHL2 support significant housing growth in accordance with the Core Strategy, and Policy BHL6 indicates minimum quantum's of new employment space to be provided on sites. Guidance on building heights seeks to strike a balance between enabling more efficient use of land in sustainable locations, and respecting the existing urban grain; as advocated by the Urban</p>	<p>Text to section 5.3 revised to read: "The table below provides some targets of how the broad figures for growth in the area (as set out in the Core Strategy) will be met within the opportunity sites. It is acknowledged that these include a higher provision of retail space than advocated in the Core Strategy, which is as a result of permitted schemes outside the neighbourhood centre, and the need to ensure a greater mass of activity and active frontages within the proposed centre. Whilst employment space figures are also higher than those set out in the Core Strategy, it should be noted that this includes figures for refurbished employment space at the Station Hub and in Sutherland Road. These differences in figures are not considered to undermine the broad</p>	Not specified



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							<p>Design Framework. As set out in the meeting with the GLA on 27/09/13, the density of schemes advocated and coming forward in key growth areas such as the Station Hub and Sutherland Road has subsequently been in accordance with the ranges set out in the London Plan; given the urban characteristics and PTAL of the area.</p> <p>It is however recognised that some wording alterations to the narrative of indicative development targets could be beneficial in clarifying that the document should not be an impediment to growth. Also, the table of indicative targets now needs updating in response to recent planning permissions, and could also be better expressed to reflect different land parcels within the Station Hub and Sutherland Road areas.</p> <p>In terms of the document needing to be more ambitious about the opportunity for change, the Council is of the view that the AAP has a strong vision and clear objectives. These have been widely supported through consultation, and are proving deliverable through schemes that have recently come forward for development.</p>	<p>Design Framework. As set out in the meeting with the GLA on 27/09/13, the density of schemes advocated and coming forward in key growth areas such as the Station Hub and Sutherland Road has subsequently been in accordance with the ranges set out in the London Plan; given the urban characteristics and PTAL of the area.</p> <p>It is however recognised that some wording alterations to the narrative of indicative development targets could be beneficial in clarifying that the document should not be an impediment to growth. Also, the table of indicative targets now needs updating in response to recent planning permissions, and could also be better expressed to reflect different land parcels within the Station Hub and Sutherland Road areas.</p> <p>In terms of the document needing to be more ambitious about the opportunity for change, the Council is of the view that the AAP has a strong vision and clear objectives. These have been widely supported through consultation, and are proving deliverable through schemes that have recently come forward for development.</p>	<p>aims of the area set out in the Core Strategy and this AAP.</p> <p>It must be stressed that that these figures are indicative only, and therefore provide a guide of what the Council considers reasonable given the characteristics of opportunity sites. Schemes that come forward with a different quantum of development or indeed mix of uses will not necessarily be refused, but instead judged on their merits and compliance with the policies, vision and objectives of this AAP, and other relevant elements of the Local Plan. The targets will not be applied as a restrictive barrier to development where proposals brought forward are exemplars of design quality."</p> <p>Table of targets for opportunity sites updated.</p> <p>Section 1.1 revised to read: "Under the governments planning system, all Councils are required to produce a Local Plan that</p>	

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								<p>Further to the meeting with the GLA on 27/09/13, it is however agreed that some of the introductory text to the document could be rephrased with more positive language to better reflect the unique opportunity offered by the area.</p>	<p>sets out policies to guide new developments over a 15-20 year period. Our Core Strategy, which was adopted in April 2012, sets out the broad vision of how the borough should develop, and identifies 4 key growth areas where our regeneration efforts should be focussed.</p> <p>Blackhorse Lane is one of these key growth areas, and it is also recognised in the Mayor's London Plan and Upper Lee Valley Opportunity Area Planning Framework as a strategically important location and major development opportunity. Through these strategic documents it has been anticipated that the area has the capacity to accommodate growth in the region of 2500 new homes, and 1000 new jobs.</p> <p>This Area Action Plan (AAP) will form part of our Local Plan, and sets out a framework for how growth should be co-ordinated, to transform the area and secure a sustainable</p>	

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									<p>pattern of development and maximum community gains. It sets out a comprehensive approach to the redevelopment of the area to secure new high quality homes and modern business space, along with supporting infrastructure including new and improved pedestrian/ cycle routes, open spaces, and community facilities such as schools and health centres.</p> <p>Once adopted, the AAP will be a statutory document used to determine planning applications in the area. It compliments, and should be read alongside the Core Strategy and Development Management Policies. The AAP is supported by a number of documents, including a Sustainability Appraisal, Habitats Regulations Assessment, Equalities Impact Assessment, and Urban Design Framework. The Urban Design Framework has been important in informing the AAP, and includes planning and design briefs for opportunity sites at the</p>	

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									<p>Station Hub and Sutherland Road. It offers detailed design guidance that is supplementary to the AAP, and will be treated as a material consideration in determining planning applications in the area.”</p> <p>Section 1.3 revised to read: "Some of the more deprived communities in London live in the area, and pockets of poor environmental quality and underused industrial land reduce the quality of life for local residents. There are few facilities to serve the needs of residents and businesses, and a lack of publically accessible open space. In recent surveys of visitors to the area, 60% of those asked felt the physical environment was either 'poor' or 'very poor', and 65% felt the shopping offer was 'poor' or 'very poor' (Shared Intelligence, 2013).</p> <p>The Lee Valley Regional Park includes the large open waterspaces of Walthamstow Reservoirs, the River Lee, and the</p>	

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									<p>green spaces of Tottenham Marshes. Existing access to, and views of these areas are extremely limited, with existing industrial areas providing a significant barrier.</p> <p>A large number of people pass through the area on a daily basis yet few stay for any length of time. Many motorists either use Blackhorse Lane and Forest Road as a route to inner London, or park near Blackhorse Road Station and use it as an interchange.</p> <p>Despite these issues, the area has fantastic potential, and is already undergoing significant change. Since work on the AAP commenced, a number of development proposals have come forward to provide quality new homes, modern business and retail space. Public sector investment in the public realm is also underway.</p> <p>To ensure future developments fully realise the scale of opportunity in the area, it is important to</p>	

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									<p>also recognise the assets of the area. The area has a strong industrial heritage. An existing business community provides a range of job opportunities including in traditional manufacturing and emerging 'creative' sectors such as music recording and productions, printers, graphic designers, community artists, computer software development and skilled craftsmanship. Examples include Inky Cuttlefish (printmaking and art studios), Barbican Arts Group Trust, and Dunhills (international company manufacturing hand made luxury goods). Retained industrial areas also provide an opportunity to capitalise on the emergence of green industries in the wider Upper Lee Valley. Recognising the major asset of the Lee Valley Regional Park, the Walthamstow Wetlands project has recently been set up with the aims of establishing a new wetland centre in the area, and improving access to these</p>	

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									<p>existing open spaces for local communities and regional visitors.</p> <p>The area benefits from an important transport hub at Blackhorse Road Station, providing convenient access to the Victoria Line and overground Barking to Gospel Oak rail services. A range of bus services also link the area to Walthamstow and the rest of the borough.</p> <p>Key assets such as Blackhorse Road Station, Lee Valley Regional Park, the industrial heritage and emergence of creative clusters, provide a fantastic opportunity for the area to become a rejuvenated local hub of activity that is a destination in its own right, and an attractive 'gateway' into the borough. By attracting new investment, we can secure benefits for existing communities; such as improved access to Walthamstow Wetlands, improvements to the quality of the local environment, improved cycle and pedestrian</p>	

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									routes, and new shops, services, and education facilities that meet the needs of local residents and businesses. The community can also benefit from major regeneration projects nearby in Tottenham Hale, Walthamstow Town Centre, and Stratford."	
534011	Greater London Authority (Ms Sukhpreet Khull)	bh1ps58	Policy BHL6: Employment	Not specified	Not specified	Not specified	Level of SIL release is supported, but it is important that remaining SIL is improved. Also suggested that Sutherland Road is completely de-designated as an industrial area and allocated for mixed use.	As set out in the meeting between the Council and the GLA on the 27/09/13, no changes to SIL boundaries have been put forward through the Development Management Policies DPD or this AAP. All changes to SIL boundaries were addressed through the Core Strategy. Paragraph 3.3.12 of the AAP explains that the Station Hub was released from its previous SIL designation through the Core Strategy. However, to further clarify, figure 5 will be amended so that in addition to showing retained SIL, it also clearly marks what land was released from this designation through the Core Strategy.  Furthermore, as set out in the meeting between the Council and the GLA on the 27/09/13, Sutherland Road has not been re-designated from SIL. Both the Core Strategy, and the Unitary	Figure 5 amended to show area of SIL released in Core Strategy and Figure 2 amended to clarify the location of Ferry Lane Industrial Estate.  At end of paragraph 3.3.5 insert: "This is consistent with the Councils approach to Borough Employment Areas in key growth areas set out in Core Strategy Policy CS8 and Development Management Policy DM19, and recognition in the Mayor's Upper Lee Valley Opportunity Area Planning Framework that Sutherland Road offers scope for growth and diversification as a mixed use creative quarter."  In section 4.6, under issues/ opportunities –	Not specified



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								<p>Development Plan before it, designated the area as BEA (Borough Employment Area). Under the Councils Core Strategy and Development Management Policies, mixed use development that secure an uplift in employment are in principle accepted in Borough Employment Areas that fall within one of the boroughs 4 key growth areas (i.e. Blackhorse Lane, the Northern Olympic Fringe, Walthamstow Town Centre, or Wood Street). Sutherland Road is home to some valued employers that can sit comfortably alongside residential. The Councils vision is for these to be retained and supplemented with additional business space for small businesses within a positive public realm, so the area can evolve to a place for creative industries, and as a place to live. Removing the BEA designation could undermine this, would be inconsistent with our Core Strategy, and could lead to pressure for 100% residential schemes, or residential and retail schemes; which would also undermine plans for a new neighbourhood centre at the Station Hub.</p> <p>The AAP is not proposing the de-</p>	<p>employment – insert to end of 3<sup>rd</sup> sentence “to form a cluster of such activities alongside the Assemble Workshops project and Blackhorse Lane Studios.”</p>	

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								<p>designation of Ferry Lane Industrial estate from SIL. It forms part of the Station Hub site that has already been de-designated through the Core Strategy. Paragraph 3.3.12 of the AAP explains this position. However, to further clarify, figure 5 will be amended so that in addition to showing retained SIL, it also clearly marks what land was released from this designation through the Core Strategy. Figure 2 will also be revised to clarify the location of Ferry Lane Industrial Estate.</p> <p>In terms of figure 4, the purple area shown is the broad location of the retained SIL, taking account of the de-designation of the area around the station established through the Core Strategy. The area advocated for mixed use development (including around Ferry Lane Industrial estate) is marked on figure 4 in light blue.</p> <p>Support for level of SIL release noted. Reference is made in the employment chapter to investment in SIL through matters such as improved industrial signage. The Council will work with landowners and the GLA to secure further investment in SIL. Consultants have also</p>		

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								been commissioned to advise on likely future demand for SIL and what investments is required.		
534011	Greater London Authority (Ms Sukhpreet Khull)	bhlps59	Policy BHL9: Open Space and Nature Conservation	Not specified	Not specified	Not specified	The future of former gun site playing field needs clarifying	<p>As set out in the meeting between the Council and the GLA on the 27/09/13, the removal of the playing field designation covering the site has been established through the Council's Development Management Policies DPD (appendix 2 – policies map changes).</p> <p>The area falls within the Lee Valley Regional Park, and the Park Authority raised no objection to its de-designation; either on consultation on the Development Management Policies or this AAP. As set out in paragraph 3.6.17, the de-designation was put forward in response to site characteristics.</p> <p>No specific proposal for the site is put forward through this AAP, and any proposals that do come forward would need to comply with green belt policy. At the time the AAP Proposed Submission was drafted, the Development Management Policies DPD had not been through examination; hence there was no cross reference to the de-designation of the former Gun-Site Playing Field.</p>	To update matters now that the Development Management Policies have been adopted, paragraph 3.6.17 should be rephrased to read: "Under the Unitary Development Plan, the area shown in figure 13 was designated as both a playing field and green belt. However, the site was not assessed in our latest playing pitch strategy, and there are no managed or marked playing fields on site. Successive planning permissions for use of parts of the site as amenity space for the adjacent Gypsy and Traveller Site (known as Peacocks Close), and as part of a Muslim burial ground, means that only a small portion of the site is not in active use, and there is no scope for future playing pitch provision. The playing field designation has therefore been removed through the Council's Development Management Policies DPD; to Removing the playing field	Not specified

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								The existing use of the northern portions of the former gun site as Muslim burial space and Gypsy and Traveller amenity space undermine any opportunity to link existing paths to the north and south. The Lee Valley Regional Park Authority has not raised such an opportunity either through consultation on this AAP or through their Park Development Framework. Furthermore, there is no such proposal outlined at this location in the Mayor's Upper Lee Valley Opportunity Area Planning Framework.	designation covering the site therefore overcomes a misleading designation. As no changes are proposed to green belt boundaries, any future applications for use of the site would need to meet the requirements of national green belt policy as set out in the NPPF."	
534011	Greater London Authority (Ms Sukhpreet Khull)	bhlps61	Policy BHL12: Transport	Not specified	Not specified	Not specified	Reference should be made for the need for planning applications to include adequate provision for buses and taxis. Reference to extension of 76 and 41 bus routes should be removed. Delete references to extensions of 76 and 41 bus routes.	Noted	insert new point viii to read: "secure adequate provision for buses and taxis to meet the needs of the proposed development, which may include financial contributions"  Rephrase 3rd sentence of paragraph 3.8.3 to read: "Transport for London are currently investing in the capacity of the Victoria Line, and exploring options for the bus network."	Not specified
534011	Greater London Authority (Ms Sukhpreet)	bhlps60	Policy BHL13	Not specified	Not specified	Not specified	Aspiration for a decentralised energy network welcomed, but policy on energy	Policy BHL13 of the AAP requires developer to meet energy targets set out in the Councils Development	Rephrase policy to read: "A) To ensure proposals in the Blackhorse Lane area	Not specified

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	Khull)						should be expanded to reflect the London Plan targets, and make clear the hierarchy of preference for energy systems	Management Policies DPD; which are the same targets as set out in the London Plan. However, it is recognised that this could be made more explicit by specifically referring to the London Plan stepped energy targets. Further revisions to policy also needed so application of energy hierarchy is clear.	<p>minimise carbon emissions, all developments of one or more units or greater than 100sqm should be accompanied by an energy assessment that demonstrates:</p> <ul style="list-style-type: none"> <li>- how the resource efficiency, the London Plans stepped carbon reduction targets, and high environmental standards set out in Policy DM10 from our Development Management Policies DPD will be met;</li> <li>- how the proposal will link in the short to medium term to the planned Blackhorse Lane Cluster, and ultimately the Upper Lee Valley Decentralised Energy Network, unless this can be demonstrated to be unfeasible or unviable.</li> </ul> <p>Where schemes come forward in advance of this infrastructure, they should be designed to be connection ready, and agree to connect to the proposed network once this is available. Planning conditions will be imposed to that affect.</p>	

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									<p>B) The Council will work with landowners to secure the delivery of new energy centres that serve clusters of development at the Station Hub and Sutherland Road, as part of the Upper Lee Valley Decentralised Energy Network. Where a landowner provides an energy centre capable of also powering neighbouring sites, any loss of developable area will be reflected in the s106 agreement.</p> <p>C) Where it has been demonstrated that it is not feasible or viable to connect to the Blackhorse Lane Cluster or Upper Lee Valley Decentralised Energy Network, a sitewide CHP network should be provided, or failing that, communal heating and cooling. In these cases sites should be served from a single energy centre, unless evidence is presented to demonstrate that this is not feasible. Furthermore, they should also be designed to be connection ready so the</p>	

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									<p>opportunity to link to the planned energy network once it has been implemented is not lost.”</p> <p>At end of paragraph 3.9.9 insert "; potentially south to the Northern Olympic Fringe and the Olympic Park"</p> <p>Rephrase 2nd sentence of 3.9.11 to read "The Greater London Authority has developed a Decentralised Energy Manual, which new developments should comply with, both in terms of principles and standards."</p>	
534011	Greater London Authority (Ms Sukhpreet Khull)	bhlps62	Site BHL2 South - Blackhorse Road/ Hawarden Road	Not specified	Not specified	Not specified	The 'access' section of the site description should refer to the need for a transport assessment	Noted	Insert new penultimate sentence to first paragraph on access to read: "This should consider the effects of the proposal on bus capacity and make provision to enhance capacity to meet additional demand."	Not specified
534011	Greater London Authority (Ms Sukhpreet Khull)	bhlps63	Site BHL7 - Billet Works	Not specified	Not specified	Not specified	The Infrastructure Plan should not reference the 158 bus route as the specific recipient of contributions from site BHL7	Noted	Rephrase "increased frequency of 158 bus route" to read "increased frequency of buses serving site BHL7"	Not specified
760705	Highways Agency (Ms	bhlps9	Introduction	Not specified	Not specified	Not specified	The AAP is unlikely to have any material	Noted	No change	Not specified

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	Felicity Drewett)			d			impact on the strategic road network			
760974	Hollivale Blackhorse Lane LLP (Agent: Miss Jane Richardson, BPTW Partnership)	bhlp23	Introduction	Not specified	Not specified	Not specified	Introduction to accompanying letter	Noted	No change	Not specified
760974	Hollivale Blackhorse Lane LLP (Agent: Miss Jane Richardson, BPTW Partnership)	bhlp24	Policy BHL4: Household Sizes	Not specified	Not specified	Not specified	Requirement for 30% family housing on Site BHL1 should be removed	See response to bhlp21	See response to bhlp21	Not specified
760974	Hollivale Blackhorse Lane LLP (Agent: Miss Jane Richardson, BPTW Partnership)	bhlp21	Policy BHL4: Household Sizes	Yes	No	Justified	Request removal of requirement for minimum of 30% 3 and 4 bed units on site BHL1	The provision of new family housing is a strategic priority for the borough, and site BHL1 is one of the Councils landmark sites for new mixed use development. The Council acknowledges that the site offers scope for attracting young professionals to the area, and policy therefore sets out a requirement for a lower level of family housing than normally required under the Development Management Policies DPD. Provision of only 30% family housing (rather than the borough norm of 50%) allows for higher density development, should aid viability, but also seeks to ensure	Rephrase last sentence of policy BHL4 part A to read: "In the interests of securing a high quality scheme at these landmark locations, at least 30% of dwellings at this site should have 3 or 4 bedrooms"	Yes



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								<p>a mixed and balanced community. It should be noted that removing the 30% target would mean that a higher level of provision would be required under the Development Management Policies.</p> <p>The preferred options paper set out an intention to introduce a lower requirement for family housing on site BHL1, and was essentially a 'direction of travel document'. The proposed submission has added further detail to this by spelling out what the Council deems to be an acceptable level of provision. The target adds detail to what was hinted at during preferred options, and does not therefore represent a change in direction in policy. As the proposed submission version has been subject to public consultation, the Council has fulfilled its duties in terms of consultation. It is however recognised that replacing the word "must" with "should" in policy wording could ensure policy is not overly restrictive, and allow scope for developers to justify departing from the requirement where exceptional costs undermine scheme viability and deliverability.</p>		

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760974	Hollivale Blackhorse Lane LLP (Agent: Miss Jane Richardson, BPTW Partnership)	bhpls25	Policy BHL7: Neighbourhood Centre and Local Retail Parades	Not specified	Not specified	Not specified	Site BHL1 and policy BHL7 should make provision for student accommodation to support the neighbourhood centre	see response top bhpls22	see response to bhpls22	Not specified
760974	Hollivale Blackhorse Lane LLP (Agent: Miss Jane Richardson, BPTW Partnership)	bhpls22	Policy BHL7: Neighbourhood Centre and Local Retail Parades	Yes	No	Justified; Effective	Provision should be made for student accommodation within the neighbourhood centre.	It is important that any proposals for student accommodation do not compromise the achievement of housing growth targets on opportunity sites, or harm aspirations for a mixed and balanced community; as set out in our Development Management Policies. Demand in London for new student accommodation is however acknowledged, and it is recognised that locations close to the tube station and proposed neighbourhood centre are the most suitable location within the plan area for such uses.	At end of policy BHL2 insert: "Any proposals for purpose built student accommodation should not undermine the Council's ability to meet its housing growth targets and provide for mixed and balanced communities, or result in overdevelopment of opportunity sites. Such accommodation should be located close to the neighbourhood centre and Blackhorse Road Station, be linked to a registered provider of higher education accommodation, and meet the space standards set out in Development Management Policy DM9."  Before paragraph 3.2.4 insert: "At a strategic level, it is recognised that there is a growing need for student accommodation to support London's higher education	Yes

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									<p>establishments. As Blackhorse Lane is within 30 minutes travel time of Central London, there may be potential to absorb some of this demand within the AAP areas more accessible locations. However, as there is no University presence or London Plan target for new student bedspace provision in the borough, it is important that any such provision does not compromise the delivery of new housing on opportunity sites, or reduce the quality of schemes by encouraging overdevelopment. Our Housing Needs Assessment and Strategic Housing Market Assessment found that Blackhorse Lane has a mobile population; with low levels of owner occupation and a high private rented sector. A key objective of the AAP is therefore to provide a range of high quality homes for families and the upwardly mobile. Any proposals for student housing will need to be considered in this context; both in terms of ensuring a</p>	

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									<p>mixed and balanced community can be achieved, and in terms of making a convincing case of the benefits a student population would bring to the local economy.”</p> <p>Within Site BHL1 guidance, at end of paragraph on housing issues/ opportunities (page 84), insert:                      “The size and locational benefits of the site means that there may also be scope for some purpose built student accommodation. However, proposals should not result in an over concentration that undermines aspirations for a mixed and balanced community, and nor should they compromise the delivery of housing targets.”</p>	
760974	Hollivale Blackhorse Lane LLP (Agent: Miss Jane Richardson, BPTW Partnership)	bhyps20	Site BHL1 - Station Hub and Waterfront	Yes	No	Justified; Effective	Site BHL1 should make provision for student accommodation	Noted	On site guidance for BHL1, under housing issue/ opportunities, at end of paragraph insert: "The size and locational benefits of the site means that there is scope for some purpose built student accommodation. As a substantial amount has	Yes

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									now been approved on part of the site, additional provision is unlikely to be supported under the terms of Policy BHL2".	
682192	Industrial Property Investment Fund (Agent: Mr Tudor Jones, GVA)	bhpls35	Introduction	Not specified	Not specified	Not specified	Conclusion to representation response letter	Noted	No change	Yes
682192	Industrial Property Investment Fund (Agent: Mr Tudor Jones, GVA)	bhpls27	Introduction	Not specified	Not specified	Not specified	Introductory text to representation letter	Noted	No change	Not specified
682192	Industrial Property Investment Fund (Agent: Mr Tudor Jones, GVA)	bhpls28	Policy BHL3: Housing Densities	Yes	No	Consistent with national policy	Policy BHL3 should be amended to allow for higher density development at alternative sites based on site specific circumstances	Proposed wording is rejected on the basis that it will undermine the broad thrust of the policy; i.e. that higher density developments should be located at the most accessible locations; in the interests of securing a sustainable pattern of growth. Such an approach would mean densities would be dealt with in an ad-hoc manner on site specific circumstances and undermine the AAPs effectiveness in terms of providing a steer on strategic matters.	No change	Yes
682192	Industrial Property Investment	bhpls29	Policy BHL4: Household Sizes	Yes	No	Consistent with national	Developments at the station hub should not be required to provide	It is considered that the proposed alterations to policy wording would weaken its effectiveness	Rephrase last sentence of policy BHL4 part A to read: "In the interests of securing	Yes

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	Fund (Agent: Mr Tudor Jones, GVA)					policy	at least 30% family housing	and the Council's ability to secure much needed family housing and a mixed and balanced community. It is unclear how the Council would determine if the proposed developer had 'sought to' provide 30% family housing, and the policy would therefore not be effective. However, it is noted that the proposed submission wording may be unnecessarily restrictive; which could be rectified through the replacement of the word 'must' with 'should'. This could then provide some flexibility for developers to demonstrate that the policy requirement cannot be met on individual sites due to matters of practicality or viability.	a high quality scheme at these landmark locations, at least 30% of dwellings at this site should have 3 or 4 bedrooms."	
682192	Industrial Property Investment Fund (Agent: Mr Tudor Jones, GVA)	bhlps30	Policy BHL5: Affordable Housing	Yes	No	Consistent with national policy	Affordable housing policy should place greater emphasis on viability	Policy BHL5 cross refers to policy CS2 from the Core Strategy. The wording in policy CS2 makes clear that viability will be a key consideration in securing new affordable housing. Furthermore section 4.1 of the AAP on opportunity sites also reiterates the importance of viability in determining individual applications as they come forward. Increased emphasis on viability within the policy is not therefore considered necessary.	No change	Yes
682192	Industrial Property Investment	bhlps31	Policy BHL6: Employment	Yes	No	Consistent with national	requirement for redevelopment of land last used for	Part A of the policy refers to opportunity sites. Part B refers to SIL. As part C refers to 'other	Rephrase first sentence of part C of policy to read: "requiring redevelopment	Yes

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	Fund (Agent: Mr Tudor Jones, GVA)					policy	employment or training to demonstrate it is not fit for purpose should not apply to opportunity sites	existing employment land', the intention is that this part of the policy would apply to sites that have not been identified as 'opportunity sites.' It is accepted that this could benefit from clarification, but the Council proposes amended wording to that put forward.	of existing employment land that is neither designated as SIL or identified as an opportunity site in Section 4 of this AAP, to demonstrate that the existing space is no longer fit for purpose, and has no reasonable prospect of coming forward for future employment use.”	
682192	Industrial Property Investment Fund (Agent: Mr Tudor Jones, GVA)	bhpls32	Policy BHL7: Neighbourhood Centre and Local Retail Parades	Yes	No	Consistent with national policy	Allowance should be made for some out of centre retail, where it does not undermine the role of the neighbourhood centre	The Council's strategy is to focus retail activities into clearly defined centres and parades; in accordance with our adopted Core Strategy, the London Plan, and national planning policy. The proposed additional point (c) would undermine this by supporting the dispersal of retail activities across a range of sites in the area. Furthermore, it is unclear what is meant by 'do not prejudice the success of the neighbourhood centre', or how this will be judged.	No change	Yes
682192	Industrial Property Investment Fund (Agent: Mr Tudor Jones, GVA)	bhpls33	Policy BHL8: Design and Local Character	Yes	No	Consistent with national policy	Policy wording should not apply a rigid approach to building heights	See response to bhpls45	See response to bhpls45	Yes
682192	Industrial Property Investment Fund (Agent:	bhpls34	Site BHL1 - Station Hub and Waterfront	Yes	No	Consistent with national policy	Provision should be made within the Station hub for retail outside of the neighbourhood	Providing for retail on the station hub outside of the defined neighbourhood centre would undermine the purpose of	No change	Yes

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	Mr Tudor Jones, GVA)						centre; development should not be required to demonstrate existing land is unfit for purpose; and it should be acknowledged that it is not always possible to relocate existing businesses locally.	defining such a centre. As set out in response to bhlp31, the requirement to demonstrate existing land is unfit for purpose would not apply to opportunity sites such as the station hub. Reference to relocating existing businesses locally refers to valued businesses at 5 Blackhorse Lane (which falls outside of the objectors land area) and it is deemed important to secure within the redevelopment. Inserting the words 'where possible' at the end of references to relocating Ferry Lane businesses is not considered necessary, as the Council will always seek the relocation of these existing businesses, and the proposed wording would have the result of weakening this stance.		
150955	Lee Valley Estates (Agent: Mr Simon Marks, Montagu Evans LLP)	bhlp314	Introduction	No	No	Justified; Effective	Introductory text to consultation letter	Noted	No change	Yes
150955	Lee Valley Estates (Agent: Mr Simon Marks, Montagu Evans LLP)	bhlp315	Paragraph 2.1.1.	No	No	Justified; Effective	Vision and objectives supported	Noted	No change	Yes
150955	Lee Valley Estates	bhlp316	Policy BHL2: Housing	No	No	Justified; Effective	Housing targets for the area should be	Policy CS1 of the Core Strategy sets out that the Blackhorse Lane	Revise 1 <sup>st</sup> sentence of policy BHL2 to read:	Yes



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	(Agent: Mr Simon Marks, Montagu Evans LLP)		Growth				increased to at least 2500 new homes	area offers scope for the provision of up to 2500 new homes. Meanwhile table 4 of the Core Strategy indicated a housing supply range of between 2000 and 2500 homes. Progress on opportunity sites since consultation on the Proposed Submission has indicated that housing targets can feasibly be increased to 2500, and be met within opportunity sites set out in the AAP.	<p>“As a key growth area, we will seek to deliver approximately 2500 new homes by 2026 in the Blackhorse Lane area.”</p> <p>Delete final sentence of paragraph 3.2.3</p> <p>Update table of indicative development targets for opportunity sites.</p>	
150955	Lee Valley Estates (Agent: Mr Simon Marks, Montagu Evans LLP)	bhpls17	Policy BHL6: Employment	No	No	Justified; Effective	Land designated as SIL should be earmarked for mixed use development	Concerns that the AAP is based on outdated evidence have been addressed through the commissioning of an updated Evaluation of Blackhorse Lane and Lea Bridge SIL (URS, 2013). This study assessed demand for employment uses in the area and provided an assessment of the quality of Silverbirch and Landmark House. This found these buildings to be of good quality and noted that the main barriers to occupancy of these units were likely to be the size of units and price. Both sites were found to be marketed at higher prices than the market average for such units, and it was also noted that subdivision of units could potentially be a viable option to help them better meet market demand.	See response to bhpls43	Yes

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								<p>The managed release of up to 24.5ha of employment land over the plan period as referred to in the Core Strategy relates to all employment land, and not just land designated as SIL; which is offered the highest level of policy protection. Through the de-designation of some SIL in the Core Strategy and Mayor's Opportunity Area Planning Framework, and through planning permissions granted for the redevelopment of other areas previously used for employment purposes, the Council is already managing the release of employment land in line with the Core Strategy target. The updated employment study (URS, 2013) re-assesses employment land projections and concludes that additional industrial land release is not necessary. It also notes that if recent planning permissions in the borough are all implemented, employment land is actually being released at a quicker pace than employment projections advocate. This undermines the case for further release of SIL.</p> <p>Whilst it is true that the primary purpose of SIL is to provide a reservoir of industrial land, the existing presence of office uses does not compromise this</p>		

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								<p>function; in terms of adversely affecting operational requirements of industry such as delivery times, noise etc. Conversely, any mixed use proposals incorporating new residential to this established industrial area could have a negative impact on surrounding existing businesses ability to continue to function effectively. It is for this reason that the SIL designation continues to cover Landmark House and Silverbirch House along with surrounding industrial uses.</p> <p>Planning permissions recently granted at opportunity sites BHL1 and BHL6 both make provision for new retail use, and as such amenities will improve when these schemes are implemented. Furthermore, the Council's primary reason for vacating Silverbirch House has been that using its own land holdings more intensively has decreased need to rent office space.</p> <p>In terms of the overview of tenants of Uplands Business Park and their activities, the Gort Scott 2013 Employment Study and the URS evaluation of Blackhorse Lane SIL found that the vast majority of activities within Uplands Business Park are</p>		

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								for SIL compatible uses; including clothing and furniture manufacturers and distributors, print companies, mechanics, and cleaning product manufacturers. This indicates the SIL designation is reflective of the broad character and activity on the site.  Further detailed justification for retaining the SIL designation covering the area is also provided in response to bhlp43 and bhlp46.		
183754	Lee Valley Regional Park Authority (Mr Stephen Wilkinson)	bhlp51	Introduction	Not specified	Not specified	Not specified	Summary of role of LVPA and support for vision and changes to the document since Preferred Options	Noted	No change	Not specified
183754	Lee Valley Regional Park Authority (Mr Stephen Wilkinson)	bhlp48	Key diagram	Not specified	Not specified	Not specified	Key diagram should show improvements to Forest Road and proposed entrances to Walthamstow Wetlands	Agreed	Figure 4 to be amended to show improved connectivity across Forest Road and proposed entrances to Walthamstow Wetlands	No
183754	Lee Valley Regional Park Authority (Mr Stephen Wilkinson)	bhlp52	Policy BHL8: Design and Local Character	Not specified	Not specified	Not specified	Guidance on building heights supported	Noted	No change	Not specified
183754	Lee Valley Regional Park Authority (Mr Stephen Wilkinson)	bhlp49	Policy BHL9: Open Space and Nature Conservation	Not specified	No	Effective	References to the Gun Site playing field should make clear that it remains within the	Agreed	At end of paragraph 3.6.17 insert "As the site also falls within the Lee Valley Regional Park, any	Yes

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	Wilkinson)						Lee Valley Regional Park		proposals should also conform with the Park Development Framework"	
183754	Lee Valley Regional Park Authority (Mr Stephen Wilkinson)	bhlp53	Policy BHL9: Open Space and Nature Conservation	Not specified	Not specified	Not specified	Alterations to policy BHL9 since Preferred Options document supported	Noted	No change	Not specified
183754	Lee Valley Regional Park Authority (Mr Stephen Wilkinson)	bhlp50	Policy BHL10: Walthamstow Wetlands and Lee Valley Regional Park	Not specified	No	Effective	AAP should incorporate additional justification of the statutory purpose of the regional park, and relevant area proposals from the Park Development Framework.	The Council is supportive of the statutory role of the Regional Park and is keen to ensure proposals accord with the Park Development Framework. This stance is set out in policy BHL10 and paragraph 3.6.30. Based on the experience of the examination of the Development Management Policies DPD, the Council is of the view that extensive descriptions of the purpose of the Regional Park and the role of the Regional Park Authority is not necessary when such matters can be addressed more succinctly through cross references to the Park Development Framework. Given that the Park Development Framework now includes area specific proposals for sites within the Blackhorse Lane area, it is recognised that such proposals should be referred to within the AAP.	At end of paragraph 3.6.30 insert: "The Regional Park Authority's Park Development Framework contains Proposals for the area of the Park that lies within the Blackhorse Lane area and these are set out in schedule 1 of this AAP. The Park Development Framework also provides further details of the role and purpose of the Regional Park and Park Authority and can be viewed at <a href="http://www.leevalleypark.org.uk/go/pdf/">http://www.leevalleypark.org.uk/go/pdf/</a> "  Then insert new schedule 1 outlining area specific proposals from the Park Development Framework.	Yes
183754	Lee Valley Regional Park Authority (Mr	bhlp54	Policy BHL10: Walthamsto	Not specified	Not specified	Not specified	Support redrafting policy BHL10 since preferred options but	Noted. Additional detail considered in response to bhlp50	See response to bhlp50	Not specified

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	Stephen Wilkinson)		w Wetlands and Lee Valley Regional Park				request additional detail within the AAP of proposals contained in the Park Development Framework			
183754	Lee Valley Regional Park Authority (Mr Stephen Wilkinson)	bhlps55	Paragraph 5.1.1	Not specified	Not specified	Not specified	A clear reference to CIL and or s106 monies securing benefits to the regional park should be inserted	Reference is made in paragraph 5.1.8 to investment in Walthamstow Wetlands (which falls within the Lee Valley Regional Park) as being a key priority for the area. It is recognised that this could be made more explicit. In addition it should be noted that the infrastructure plan at 5.2 lists a number of projects that secure benefits to the regional park under the section of public realm.	Rephrase 2nd sentence of paragraph 5.1.8 to read: "Whilst improved pedestrian links across the Standard Junction, improved public access into the Lee Valley Regional Park and Walthamstow Wetlands, and the provision of new and improved education, community and health facilities are key priorities, the full infrastructure requirements needed to support the level of growth proposed are set out in the infrastructure delivery plan below."	Not specified
760701	London Underground Ltd (Shahina Inayathusein)	bhlps8	Introduction	Not specified	Not specified	Not specified	Request prior notification of any works within 50m of railway	Noted - London Underground will be consulted on such applications	No change	Not specified
732145	Marine Management Organisation (Ms Angela Atkinson)	bhlps10	Introduction	Not specified	Not specified	Not specified	The MMO has no comments on the document	Noted	No change	Not specified
556058	Mr Sam Parry	bhlps3	Key diagram	Yes	Yes	Not specified	Document supported	Noted	No action required	No
150911	National Grid	bhlps18	Introduction	Not	Not	Not	Background to national	Noted	No change	Not

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	(Agent: Mr Julian Austin, Amec)			specified	specified	specified	grid responsibilities			specified
336234	Natural England (Ms Kate Wheeler)	bhlps12	Introduction	Not specified	Not specified	Not specified	Natural England have no comment on the AAP	Noted	No change	Not specified
151002	Thames Water (Agent: Mr Phil Jameson, Savills)	bhlps5	Policy BHL10: Walthamstow Wetlands and Lee Valley Regional Park	Yes	Yes	Not specified	Broad support for document, subject to minor wording alterations to respect the operational requirements of Walthamstow reservoirs	Noted. Paragraph 3.6.8 refers to the importance of respecting the functional aspects of Thames Waters land holdings. It is recognised that this could be reiterated through some minor wording change to paragraphs 3.6.2 and 3.6.21	Opening sentence of paragraph 3.6.2 rephrased to read: "Walthamstow Reservoirs, part of the Walthamstow Wetlands project, are an exceptional and extensive blue/green asset adjoining the Blackhorse Lane area." Opening sentence of paragraph 3.6.21 rephrased to read: "To ensure improved public access does not compromise the biodiversity and nature conservation value of the site, or the functional and operational aspects of Walthamstow Reservoirs, a robust access management strategy will be produced as part of the Wetlands project."	No
151002	Thames Water (Agent: Mr Phil Jameson, Savills)	bhlps6	Policy BHL11: Flood Risk	Yes	Yes	Not specified	Flood risk section of document supported. Attention drawn to the importance of maintenance of SuDs to ensure their	Noted. Policy part C (i) flags up the importance of maintenance schemes for SuDs	No change required	No

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							effectiveness.			
151002	Thames Water (Agent: Mr Phil Jameson, Savills)	bhlps7	Paragraph 4.1.1	Yes	Yes	Not specified	Cross references to DM policies regarding water infrastructure would be helpful so the requirement for developers to ensure adequate provision of water and waste water infrastructure is clear. Thames Water should be consulted on most major applications.	Noted - paragraph 4.1.9 makes clear that DM35 will apply	No change	No
761267	Transport for London (Mr Andrew Maunder)	bhlps39	Introduction	Not specified	Not specified	Not specified	Conclusion to representation letter	Noted - see response to bhlps36 and bhlps38	See response to bhlps36 and bhlps38	Yes
761267	Transport for London (Mr Andrew Maunder)	bhlps37	Introduction	Not specified	Not specified	Not specified	Introduction to representation letter	Noted - see response to bhlps36 and bhlps38	See response to bhlps36 and bhlps38	Yes
761267	Transport for London (Mr Andrew Maunder)	bhlps36	Policy BHL4: Household Sizes	Not specified	No	Justified; Consistent with national policy	Requirement for 30% family housing at the Station Hub is too onerous	see response to bhlps21	See response to bhlps21	Yes
761267	Transport for London (Mr Andrew Maunder)	bhlps38	Policy BHL8: Design and Local Character	Not specified	No	Justified; Consistent with national policy	Proposed building heights are too restrictive	Policy on building heights is based on evidence base (the Urban Design Framework) and helps ensure the AAP is locally specific and that new developments will respond to their context. Paragraph 3.5.13 makes clear that guidance on heights is not a rigid limit where schemes can provide very strong	No change	Yes



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								justification including high design quality. The objectors proposed wording would result in the loss of locally specific policy based on evidence, and replace it with duplication of borough wide guidance from the Core Strategy.		
183298	Workspace Group PLC (Agent: Mr Tudor Jones, GVA)	bhllps47	Introduction	Yes	No	Consistent with national policy	Conclusion to representation letter	Noted	No change	Yes
183298	Workspace Group PLC (Agent: Mr Tudor Jones, GVA)	bhllps40	Introduction	Not specified	No	Consistent with national policy	Introduction to representation letter	Noted	No change	Yes
183298	Workspace Group PLC (Agent: Mr Tudor Jones, GVA)	bhllps41	Policy BHL3: Housing Densities	Yes	No	Consistent with national policy	Provision should be made for higher density developments at a range of sites, based on site specific circumstances.	See response to bhllps28	No change	Yes
183298	Workspace Group PLC (Agent: Mr Tudor Jones, GVA)	bhllps42	Policy BHL5: Affordable Housing	Yes	No	Consistent with national policy	Policy wording should give greater reference to the impact of viability on affordable housing provision, and make greater allowances for off-site affordable housing provision.	Policy BHL5 cross refers to policy CS2 from the Core Strategy. The wording in policy CS2 makes clear that viability will be a key consideration in securing new affordable housing. Furthermore section 4.1 of the AAP on opportunity sites also reiterates the importance of viability in determining individual applications as they come forward. Increased emphasis on viability within the policy is not	No change	Yes

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								therefore considered necessary. Furthermore, the Council will normally seek for affordable housing to be provided on site, to help secure a mixed and balanced community within new developments, and as justified in paragraph 3.2.18 of the Proposed Submission.		
183298	Workspace Group PLC (Agent: Mr Tudor Jones, GVA)	bhlp43	Policy BHL6: Employment	Yes	No	Consistent with national policy	A more flexible approach to SIL should be provided to allow mixed use developments in the future; opportunity sites should not be required to demonstrate existing employment land is unfit for purpose.	The SIL designation covering the site is consistent with higher tier policy in our Core Strategy, the London Plan, and the recently adopted Upper Lee Valley Opportunity Area Planning Framework. Allowing for mixed use development within the SIL would undermine the purpose of the designation as set out in these strategic documents. Retention of the SIL in the AAP Proposed Submission was based on the findings on the 2009 Employment Study. In recognition of criticisms of the dated nature of the 2009 Employment Land Study, the Council commissioned an updated assessment of SILs in Blackhorse Lane and Lea Bridge in 2013. Its headline findings were: <ul style="list-style-type: none"> <li>Levels of demand for industrial uses have not substantially changed from 2009, or GLA benchmarking work from</li> </ul>	Paragraphs 3.3.13 and 3.3.14 revised to read: "Through our Core Strategy and the Mayor's Upper Lee Valley Opportunity Area Planning Framework, previous SIL designations at the Station Hub and Waterfront (Site BHL1) have been removed. This is to realise ambitions for more efficient use of land close to Blackhorse Road Station. Land to the north of the Station Hub does not offer the same opportunities in terms of a new neighbourhood centre close to a major public transport hub; so sensitive uses such as residential will be rejected on the basis that they will compromise the function of remaining SIL. They would also undermine future opportunities for the growth sectors discussed in 3.3.12	Yes

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								<p>the Land for Industry and Transport SPG on employment projections and industrial land release. There is therefore no compelling case for the borough to release further employment land than it has already planned for</p> <ul style="list-style-type: none"> <li>• Uplands Business Park, and the wider SIL designation, has low levels of vacancy</li> <li>• Whilst demand for B2 is declining, there is a continued demand for B8 uses (particularly 3<sup>rd</sup> tier distribution such as internet retailers); and an increasing demand for small units for SMEs</li> <li>• Average market rents, parking and access provision, proximity to road, rail, and existing and planned shops and services makes the Blackhorse Lane SIL attractive to industrial occupiers, and investment in the public realm could enhance its attractiveness to B1 businesses such as creative industries being priced out of Hackney and Tower Hamlets.</li> </ul>	<p>above; whose requirements include being isolated from residential areas. Where land in this area becomes vacant, it offers scope for redevelopment for business sectors such as those referred to above, or for the relocation of displaced businesses from sites such as the Station Hub and Waterfront, or other industrial areas in the borough where mixed use redevelopment is considered acceptable in principle. This will ensure regeneration efforts do not result in a migration of established businesses out of the borough. This is important as job retention and creation are key objectives for the Council. The retention of SIL is also based on evidence of its fitness for purpose, an analysis of the local property market, and up to date projections of changes in employment sectors and demand for employment land. Whilst changes to the SIL boundary set out in the Core Strategy and Upper Lee Valley Opportunity</p>	

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								<p>Furthermore, Blackhorse Lane is seen the location of choice for businesses wishing to locate in the borough</p> <ul style="list-style-type: none"> <li>• That the quality of buildings and the environment were mixed rather than universally poor – with 60% of buildings found to be in good condition, and any poor public realm attributed to factors such as noise and traffic as a consequence of industrial activity in the area</li> <li>• The wider SIL area contains a number of 'bad neighbour uses' whose operational requirements could be adversely affected by residential development</li> </ul> <p>Based on the findings of this evaluation of land designated as SIL, the Council is of the view that retaining the SIL designation is compliant with the NPPF. Specifically in relation to paragraph 22 of the NPPF, the Councils evidence base has found that there is a reasonable prospect of the site in question continuing to be used for its allocated use. Furthermore, the</p>	<p>Area Planning Framework were underpinned by the Councils 2009 Employment Study, an updated evaluation of remaining land designated a SIL has been used to inform this AAP. This found that there had been no material change in employment land projections from that already planned for, that remaining SIL was largely occupied and displayed suitable site characteristics for an industrial classification, and that Blackhorse Lane was held in high regard as an industrial location in the local property market area. It therefore concluded that there was no compelling case for further release of land from its SIL designation.</p> <p>Over time, investment will be needed in land designated as SIL to ensure it remains fit for purpose. Whilst this is largely the responsibility of landowners (particularly in terms of building stock), opportunities for external funding will be explored in order to support business</p>	

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								<p>allocation covering the site has been recently reviewed in accordance with the NPPF; through the Councils Core Strategy (where the Planning Inspector concluded that retaining the SIL designation was reasonable), and through the Mayors Upper Lee Valley Opportunity Area Planning Framework.</p> <p>References to the findings of the Local Economic Assessment are acknowledged. However, it is also worth pointing out that section 5.2 of this study highlights that manufacturing, logistics and wholesale (i.e. SIL compatible uses) are important to the Waltham Forest economy. Given that other studies have indicated that there is likely to be a continued demand for such uses, a broader shift in the economy towards softer uses such as finance, business services and personal services does not in itself provide justification for release of land in industrial designations; especially given that significant provision is given elsewhere in the plan area for mixed use developments.</p> <p>The Council is of the view that proposed wording changes to parts (a) and (b) of policy would be contrary with the London Plan, OAPF, and our CS in terms of</p>	<p>growth. Recent examples include commitments to improved signage of industrial estates using moneys acquired from the Outer London Fund, and promoting programmes such as the Mayor's broadband connection voucher scheme. Over the lifetime of the plan, there may be opportunities for further funding towards other infrastructure improvements such as an enhanced public realm and investment in IT infrastructure; which will help ensure the area is primed to meet the needs of modern businesses."</p>	

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								<p>allowing mixed use development in SIL. It would also undermine the operational requirements of existing business sectors that have been identified as important to the Waltham Forest Economy, and would raise 'hope value' on the entire SIL designation; which would undermine opportunities for its continued economic function; since prices are known to be a key consideration for industrial businesses as set out in the URS study.</p> <p>Regarding part (c) of policy, see changes proposed in response to bhlp31; which makes clear that where the AAP establishes the principle of mixed use development, there is no requirement on developers to demonstrate existing business stock in unfit for purpose. This is consistent with policy DM20 of our Development Management Policies DPD.</p> <p>As set out in paragraph 3.3.22 of the Proposed Submission AAP, the benefits of providing for education and training facilities alongside employment uses are recognised. They are however considered to be more compatible in mixed use areas than in areas where whose primary purpose is for industrial</p>		

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								activity. As currently worded, the approach in policy part (e) is consistent with Policy DM21 of the Councils adopted Development Management Policies DPD, and its justification provided in paragraph 22.3 of that document. It is not clear what justification there is for providing an alternative approach in the Blackhorse Lane area to what the Councils borough-wide position is. Furthermore, in the proposed alternative wording offered, it is unclear how the term "where appropriate" would be judged.		
183298	Workspace Group PLC (Agent: Mr Tudor Jones, GVA)	bhlps44	Policy BHL7: Neighbourhood Centre and Local Retail Parades	Yes	No	Consistent with national policy	Policy should acknowledge opportunities for out of centre retail	The Council's strategy is to focus retail activities into clearly defined centres and parades; in accordance with our adopted Core Strategy, the London Plan, and national planning policy. The proposed additional point (c) would undermine this by supporting the dispersal of retail activities across a range of sites in the area.	No change	Yes
183298	Workspace Group PLC (Agent: Mr Tudor Jones, GVA)	bhlps45	Policy BHL8: Design and Local Character	Yes	No	Consistent with national policy	Policy should not place an upper limit on building heights, or restrict landmark locations to the station hub	Policy on building heights is based on evidence base (the Urban Design Framework) and helps ensure the AAP is locally specific and that new developments will respond to their context. Paragraph 3.5.13 makes clear that guidance on heights is not a rigid limit where	No change	Yes

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								schemes can provide very strong justification including high design quality. The objectors proposed wording would make the AAP less locally specific and result in a void in guidance in terms of what will normally be considered acceptable in the area.		
183298	Workspace Group PLC (Agent: Mr Tudor Jones, GVA)	bhllps46	Discounted sites	Yes	No	Consistent with national policy	Uplands Business Park should be considered as an opportunity site for mixed use development	<p>See response to bhllps43 regarding the principle of the SIL designation covering the site.</p> <p>The objector notes that the London Plan review is the appropriate means to seek amendments to the Mayor's SIL designation, rather than the AAP. Identifying the site as an AAP opportunity site where mixed use development is acceptable would not comply with the London Plan and therefore be unsound. It would also be contrary to the local evidence base which recommends the retention of the SIL designation.</p> <p>It should also be noted that Uplands Business Park does not benefit from the same characteristics as the Station Hub site; which has been released from its SIL designation. The Station Hub site is located opposite Blackhorse Road Station in the most accessible location of the Blackhorse Lane AAP, and its release has been</p>	See response to bhllps43	Yes



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								justified in terms of making efficient use of land at public transport hubs. By contrast Uplands Business Park has a PTAL rating of 2, and is also closer to the A406 which is a key factor of attractiveness to industrial occupiers (as set out in the URS employment study). The Station Hub is also closer to existing retail parades and therefore the logical destination for a new neighbourhood centre as part of a mixed use development. Finally it is only bounded by industrial uses to the north; whereas Uplands Business Park is broadly in the centre of the retained SIL designation.		