

Waltham Forest Local Plan Supporting Document



Blackhorse Lane Area Action Plan Consultation Report

Part II – Schedule of Full Representations on the Blackhorse Lane Area Action Plan Proposed Submission

Regulation 22(1)(e)

February 2014

INTERPRETING AND TRANSLATION ASSISTANCE

This document or its summary can be made available in other languages, large print, Braille, audio-tape format or a translation service provided on request. Should you require access to these services please contact us at the address stated below.

This document can also be made available on Audio Tape Braille Large Print

<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>CONTACT: 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: planning.policy@walthamforest.gov.uk Web site: www.walthamforest.gov.uk</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)

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

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

Respondent ID	Respondent	Representation ID	Submission Type
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

Blackhorse Lane Area Action Plan Consultation Report – Part II

	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

Blackhorse Lane Area Action Plan Consultation Report – Part II

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

Blackhorse Lane Area Action Plan Consultation Report – Part II

Schedule of Full Representations on the Blackhorse Lane Area Action Plan Proposed Submission (62 Representations from 19 Respondents)

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
537451	BT Openreach (Mr Mick Sharpe)	bhlps11	Introduction	Not specified	Not specified	Not specified	From our records, it would appear that BT apparatus exists within the vicinity of these areas and subject to your proposals may require some alteration. Please contact this office when you are in a position to discuss your proposals and how they impact on Openreach Apparatus. It would be helpful if your proposals are divided into smaller work areas.	Not specified	Not specified	Not specified
745279	Canal and River Trust (Mrs Claire McLean)	bhlps2	Introduction	Yes	Yes	Not specified	N/A	Not specified	No	N/A
682134	E and R Fuller Ltd (Agent: Mr John Newton, John Newton Associates)	bhlps26	Site BHL4 South - Sutherland Road	Yes	No	Effective; Consistent with national policy	1. These submissions are made in respect of Site BHL 4 South and Policy BHL 6. 2. They should be considered in the context of previous submissions dated 20th September 2011 in so far as they are relevant to the current position. 3. My clients are pleased to note that this area is now to be considered as a mixed use development area comprising B1, residential and community uses. 4. Of particular concern however are the ratios proposed since it is considered that the Councils objectives as set out are unlikely to be achieved without introducing more flexibility in the	See above	No	N/A

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							<p>interpretation of these standards. 5. It is considered that the artificial limit of 200 dwellings (of which 110 have already been used up) is not based on a market viability study since in my clients current experience a higher ratio of residential development to B1 Use is necessary to enable a project to proceed in this area. 6. Separation of the uses is also important in some instances since in my clients recent experience that Social Needs Housing Providers require separate and independent developments not directly linked to B1 Uses. 7. To achieve the objectives it is considered that development in excess of 5 storeys in height should be regarded as appropriate subject to normal design and impact assessments. 8. This will allow additional residential development to be included within a scheme incorporating B1 Uses that can then be a viable project. 9. The question of viability is of even more significance now arising from the high level of Community Infrastructure Levy being proposed by the Council on such projects. 10. This issue is referred to in Policy BHL 6 at Section C and it is to be hoped that if the market conditions set out apply</p>			

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							the Council will adopt a flexible approach to any redevelopment proposals. 11. It is considered that the above submissions are relevant and material to the Action Area Plan and should be fully taken in to account in finalisation of the Councils Policies that should be interpreted in a flexible manner corresponding to market conditions that will be appropriate at the relevant time.			
441261	English Heritage (Mr Nick Bishop)	bhlps19	Introduction	Not specified	Not specified	Not specified	Thank you for the opportunity to comment on the above documents. As the Governments adviser on the historic environment English Heritage is keen to ensure that the protection of the historic environment is fully taken into account at all stages in the development of the local planning process and we welcome the opportunity to comment on these Area Action Plans (AAP). English Heritage has provided comments on the preferred options drafts and welcomes the several revisions which have been made in light of our response. We do not wish to make any further comments on the Blackhorse Lane AAP. We hope these comments prove useful in finalising the Walthamstow Town Centre and Blackhorse Lane AAPs. English	Not specified	Not specified	Not specified

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							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.			
680877	Environment Agency (Miss Eleri Randall)	bhlps4	Policy BHL11: Flood Risk	Yes	Yes	Not specified	Overall we support the Flood Risk Policy BHL11 which we have reviewed previously, commenting on drafts to ensure we were satisfied with the policy wording and supporting text. We also note the application of the Sequential Test for the Station Hub and Waterfront Site BHL1 is referred to and note that in your previous comments to us you had not deemed a Sequential Test necessary for other sites that are not in an area of flood risk.	N/A	No	N/A
534011	Greater London	bhlps56	Introduction	Not specified	Not specified	Not specified	Context 1. On 18 March 2013 Waltham Forest Council	Not specified	Not specified	Not specified

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
	Authority (Ms Sukhpreet Khull)						<p>consulted the Mayor of London on the above Document. This report sets out information for the Mayors use in deciding what comments to make. The consultation period ends on 29 April 2013. 2. The Local Development Framework together with the Mayors Spatial Development Strategy, ("London Plan") and the National Planning Policy Framework ("NPPF") provides the essential framework for planning at the borough level. The "development plan" in London for the purposes of section 38(6) of the act is: The London Plan (2011), and Development plan documents produced by the borough councils (and saved unitary development plan policies in transitional period). And Neighbourhood Plans as appropriate. 3. There are three types of Local Development Documents ("LDDs"): Development Plan Documents (DPDs); Supplementary Planning Documents ("SPDs"); and Statements of Community Involvement. The document now being consulted on is a DPD with development plan status, which will be subject to an examination to test the 'soundness' of the plan. 4. The NPPF states that a plan is</p>			

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							<p>"sound" where it is positively prepared, justified, effective and consistent with national policy. The Mayor's role 5. All DPDs must be in general conformity with the London Plan, in accordance with Section 24(1)(b) of the PCPA. Section 24(4) of the PCPA requires boroughs prior to submitting it to the Secretary of State to request the opinion in writing of the Mayor of London as to the general conformity of a DPD with the London Plan and advises that they may request the opinion in writing of the Mayor as to the general conformity of any other LDD. The Mayor issues this opinion on DPD general conformity in accordance with Section 24(5) of the PCPA. Further to this Regulation 18 requires general consultation at the pre-submission stage. By virtue of Regulation 21 (2) of the Regulations the Mayor has 6 weeks from the date of the request to provide his opinion on whether the DPD is in general conformity with the London Plan. 6. Mayor of London's comments will be made available on the GLA website Previous representations 11. The Mayor made representations on the preferred option consultation stage of the Area Action plan</p>			

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							<p>preparation process on 11 October 2011, (planning report PDU/LDF31/LDDOI/01), and representations were made by officers under delegated authority to the (Issues and Options) consultation stage on 9 February 2005. A number of the issues that were raised at these stages have been satisfactorily resolved. Proposed representations and current work being undertaken</p> <p>12. The Waltham Forest Local Development Framework will replace the adopted 1996 Unitary Development Plan. It will set the Council's approach to the planning of the borough up to 2026 and will consist of the Core Strategy, Proposals Map, Development Management Policies document, Site Specific Allocations Document, Area Action Plans and a number of supplementary planning documents.</p> <p>13. The Council's Core Strategy, adopted March 2012 replaces 145 out of the 158 policies in the London Borough of Waltham Forest Unitary Development Plan.</p> <p>14. The Development Management Policies (DMP) DPD has an Examination in Public scheduled in for May 2013 along with the Proposals Map. The Council is currently going through</p>			

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							<p>Inspector's questions and issues. GLA officers have been informed by the Council that The Inspector has suggested that all the remaining policies not replaced by the Core Strategy should be replaced by the DMP DPD in due course. The Council is therefore attempting to phase out the UDP policies in this manner. 15. Area Action Plans for Walthamstow Town Centre and this consultation document-the Blackhorse Lane Area Action Plan are at Proposed Submission consultation. Preferred Options work for the Wood Street AAP is being prepared, however this is not currently out for consultation. 16. The Preferred Options for the Site Specific Allocations DPD is being prepared by the Council at this present time and the Northern Olympic Fringe AAP Preferred Options was consulted on in January 2011 but the Proposed Submission version has not been finalised as yet.</p>			
534011	Greater London Authority (Ms Sukhpreet Khull)	bhlps64	Introduction	Not specified	Not specified	Not specified	Legal considerations 37. All LDDs must be in general conformity with the London Plan in accordance with Section 24(1)(b) of the Act. This is a key test of the soundness of plans. The Mayor's representations made at this stage will go forward to the examination in public and must	Not specified	Not specified	Not specified

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							<p>include an opinion regarding general conformity with the London Plan. 38. The fact that a development plan document is inconsistent with one or more policies in the London Plan, either directly or through the omission of a policy or proposal, does not, by itself, mean that the document is not in general conformity. Rather, the test is how significant the inconsistency is from the point of view of delivery of the London Plan. 39. Any expression of opinion from the Mayor that the DPD is not in general conformity will be treated as a representation to be dealt with by the Inspector at the examination. The Planning Inspectorate has stated that the view of the Mayor's opinion "will be given considerable weight" and that a lack of general conformity with the London Plan will need to be fully justified on the basis of local circumstances, based on relevant evidence. 40. The Mayor must also state why the policy is not in general conformity and his reasoning behind that opinion. The Inspector will determine whether he or she supports the opinion and recommend accordingly. The Mayor should provide the Inspector conducting the examination with any necessary</p>			

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							<p>additional information as appropriate, either through a representative or in writing according to the requirements of the Inspector. The examination for this particular document is currently unknown however, the Development management Policies document within which some of the changes for this document are initially established, is due to be held in May 2013. Conclusion 41. The Draft Blackhorse Lane AAP DPD is a welcome policy document that is considered to be in general conformity with the London Plan. However, it is yet to express in strategic spatial terms the very significant growth and regeneration opportunities that this exciting area presents to future development. There are a number of suggestions put forward for the presentation of SIL redefined boundaries, the designation of playing field land, energy and transport policy areas which should be considered before this document is considered to be finalised. Borough officers are advised to meet with GLA officers to discuss the approach applied within the document so that a more visionary and investment generating plan can be achieved.</p>			

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							The density and scale of development should be increased to achieve the desired critical mass for sustainable growth and economic investment and development to reflect the London Plan.			
534011	Greater London Authority (Ms Sukhpreet Khull)	bhps57	Introduction	Not specified	Not specified	Not specified	Strategic issues The draft Upper Lee Valley Opportunity Area Planning Framework (OAPF) 17. 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. The Council should note that the OAPF is currently being redrafted after the consultation in November-January 2011-12. The proposals for industrial activities and growth, the opening up of the Lee Valley Regional Park, proposed development masterplans and the development have been incorporated into one chapter to cover both Tottenham Hale and Blackhorse Lane together, although both sites fall into two separate Boroughs. The OAPF aims to create over 15,000 new jobs and 16,200 new homes by 2031 around four growth areas of Tottenham Hale and Blackhorse Lane, Meridian Water in Central Leaside, Ponders End and the A 10/ A 101 0 Corridor. Land use around existing	Not specified	Not specified	Not specified

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							<p>transport hubs will be rationalised to support medium and high density mixed use developments. The benefits and opportunities of the new developments will be integrated with the existing communities on the A 10/ A 1010 spine, including improved connections between the east and west of the opportunity area, improved access in and through the Lee Valley Regional Park and the Walthamstow Wetlands Project, an improved transport network within the Lee Valley and the London-Stansted-Cambridge-Peterborough Growth Corridor and the creation of a Lee Valley heat network. Summary of main strategic issues identified in the AAP document 18. It is acknowledged that the proposals outlined in the Blackhorse Lane AAP document seek to create significant growth through sustainable mixed use development, provide housing, small scale businesses which are compatible with residential led uses (since it is apparent in the document that the development proposals sought are residential led) and commercial development. The document also touches on open and green spaces and considers the benefits to be gained from</p>			

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							<p>financial contributions to area specific improvements. The AAP is also being used to provide a steer to the developing CIL document as a means of justifying where and the type of contributions that will be sought in the borough for investment and improvements. 19. One concern is that, as currently drafted the document almost reads like a site specific proposals document and has a piecemeal approach to development delivery which appears to be dependent on the release of sites or in some cases through the de-designation of protected land use sites. It seems that the de-designation of sites should be considered in the core strategy or site specific proposals document rather than specifically through an AAP, despite the fact that the sites concerned may be within this AAP area, (eg; the playing field site-figure 13). It is understood from discussions with officers that the proposed de-designation of this particular site was also put forward in the schedule in the DMP DPD, and generally it would be useful for the document concerned to have some form of signposting to the various policies/references in the other developed DPDs. 20. The AAP needs to be more visionary,</p>			

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							<p>ambitious and spatial in its main objectives and overall area based approach to large scale change and regeneration. It is apparent that the development proposals do not optimise development and residential densities, particularly near the town centre and station locations to the extent that they should. Refer to the housing section of this report below. The concern here is that the infrastructure projects to be driven by the development proposals coming forward are not likely to generate the level of contributions necessary to make the proposals/projects immediately deliverable. The type of development attracted to these sites needs to be of greater prominence and with higher densities to generate the gains envisaged (on page 131). The development approach tends to be piecemeal and reactive rather than being visionary. And strategic as expected in an AAP document. It does not consider the consolidation of land or the redefinition of land/areas to facilitate clusters of businesses. Overall, the approach should be more ambitious with development numbers, type and densities increased with greater focus on employment investment and</p>			

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							significant housing growth.			
534011	Greater London Authority (Ms Sukhpreet Khull)	bh1ps58	Policy BHL6: Employment	Not specified	Not specified	Not specified	SIL/employment 21. It would be useful for the SIL land which has been put forward to be released in the DMP DPD to be shown on figure 5 to indicate the boundaries of SIL/LSIS locations that will be retained and which locations will be released. Considering that the Council has proposed to redefine the SIL designation through its various DPDs, this approach would clarify the change in policy terms. It is also recommended that the Council provide a signpost or cross reference to the various other DPDs in which such changes are proposed. This would make it easier to know which policies would apply to specific sites. Currently it is not clear or easily navigable to link various DPDs and policies spatially. 22. GLA officers are aware of the proposed re-designation of Sutherland Road, which will become a locally strategic industrial site rather than a SIL. It is recommended that this area be completely de-designated from industrial use designation and allocated for mixed use with greater housing and potential town centre uses, alongside consolidation and investment strategies for the SIL zone. Similarly the south eastern tip of	Not specified	Not specified	Not specified

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							<p>Blackhorse Lane SIL has also been proposed for removal at the southern end of the Ferry Lane Industrial Estate and this should also be visible /defined with before and after boundaries. Shading the map in this way would clarify the Council's new proposals for SIL in the AAP area. 23. The document makes mention to important historical employers in the area such as Dunhills and Warren Evans, which the Council propose to safeguard due to their name/branding and pull to attract further business and jobs in the area. The document also recognises the change in industry to lighter business focussed manufacturing in the area and outlines the mix use type of development that is sought in the area to allow for residential development alongside business and thus job development. This is supported in strategic policy terms. 24. Figure4 shows an area in purple colouring which covers the SIL designation in the AAP, however mix use residential led development proposal are coming forward in this area to occupy the released sites here, particularly around the Ferry Land Industrial estate, which would make this area partially mixed use in nature also, and therefore perhaps the</p>			

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							marking on this figure should reflect this. 25. Overall, the level of SIL release is consistent with the GLA's benchmarks, however it is vital that the quality of the remaining SIL is improved, the level of jobs created maximised and the space optimised in density terms and through effective implementation and investment strategies that tighten the SIL boundaries to create optimum economic development.			
534011	Greater London Authority (Ms Sukhpreet Khull)	bhlps59	Policy BHL9: Open Space and Nature Conservation	Not specified	Not specified	Not specified	26. Paragraph 3.6.17 of the AAP, page 51 refers to the above mentioned field which is proposed for removal of its Play Field status whilst maintaining the Green Belt designation it is afforded. The northern tip of the site is used as a Traveller site and the southern end is used as a Muslim burial ground. The mid portion is therefore unused. The land is considered to be of poor quality with poor access and the AAP together with the earlier development Management Policies DPD put forward this site for the de-designation of the Play Field status. Clarification is required of what is proposed at this site i.e. the extension of the burial ground or a development proposal. The GLA would not want the playing field designation to be an impediment to the	Not specified	Not specified	Not specified

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							<p>extension of burial space however this needs to be clarified. It is understood that the NPPF policy in relation to Green Belt would apply however the loss of a playing field would need to be justified on the basis that it is no longer required. This is essential since the Council has not assessed this site within its playing pitch strategy to know that its loss would not be of detrimental impact in the area/Borough. 27. There is an existing path along the northern boundary of the playing field and an access point to the south next to Banbury Reservoir. There is a potential to connect these through the mid-portion of the playing field as a continuous path into and through the Lee Valley Regional Park. (The site is within the Lee Valley Regional Park boundary). 28. This can benefit from an overall aspiration to enhance a continuous network of green spaces along the Lee Valley Regional Park and its Blue Ribbon Network, as well as access to the Walthamstow Wetlands Project which the Blackhorse Lane development is adjacent to and is designated as a Special Protection Area, RAMSAR and Site of Special Scientific Interest.</p>			

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
534011	Greater London Authority (Ms Sukhpreet Khull)	bhlps61	Policy BHL12: Transport	Not specified	Not specified	Not specified	<p>Transport 32. The AAP area is centred on Blackhorse Road station, which provides fast, well connected London Underground services on the Victoria line, and London Overground services on the Gospel Oak to Barking line. Five bus routes operate within the AAP area, providing both north-south and east-west links, although the Public Transport Accessibility (PTAL) of the area is highest around the station, with a very good PTAL rating of 5 (out of a range of 1 to 6 where 6 is considered as excellent), although this drops to values of 1 band 2 (very poor and poor) in the areas of the AAP furthest from the station. The high accessibility of the stations should be seen as a very significant opportunity and catalyst for densification and regeneration 33. TfL had provided comments in September 2011 on the Preferred Options stage of the AAP and welcomed the proposed intensification of the Blackhorse Lane area in light of its role in delivering growth in the wider Upper Lee Valley Opportunity Area. Policies which promoted high density, car free developments close to Blackhorse Road station were supported in line with London Plan Policies 3.4 Optimising</p>	Not specified	Not specified	Not specified

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							<p>Housing Potential and 6.13 Parking given the very good PTAL of the area, as were those which promoted walking, cycling and travel planning in line with London Plan Policies 6.3 Assessing Effects of Development on Transport Capacity, 6.9 Cycling and 6.10 Walking. 34. However, as well as some relatively minor concerns over the lack of references to freight, TfL had previously raised the issue that AAP policy BH12 'Transport' did not reference the need for planning applications to include adequate provision for bus stops, stands or bus routeings, nor reference the need for adequate taxi facilities. This is of particular concern as paragraph 3.8.3 states that TfL is investigating the extension of the 76 and 41 bus routes to Blackhorse Road. Although these were considered as illustrative proposals in the Upper Lee Valley OAPF, TfL currently have no plans to extend specific bus routes in the area and such reference should therefore be removed from the document. Where bus route extensions are considered necessary to provide additional bus capacity in order to mitigate development impact, developer contributions would</p>			

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							need to be sought to deliver this at no cost to TfL in line with London Plan Policy 6.2 Providing Public Transport Capacity and Safeguarding Land for Transport.			
534011	Greater London Authority (Ms Sukhpreet Khull)	bhllps60	Policy BHL13	Not specified	Not specified	Not specified	<p>29. To ensure proposals in the Blackhorse Lane area minimise carbon emissions, all developments of one or more units or greater than 100sqm should be accompanied by an energy assessment (that sets out how the development will meet the Mayor's energy hierarchy and associated CO2 reduction targets) that demonstrates: how the resource efficiency, carbon reduction targets and high environmental standards set out in Policy DM11 in the Development Management Policies DPD will be met; how the proposal will connect to the planned "Lee Valley Heat Network" (Decentralised Energy Network) for the Upper Lee Valley (unless this can be demonstrated to be unfeasible or unviable). Where schemes come forward in advance of any Decentralised Energy Network, they should be designed to be 'connection ready'.</p> <p>30. There is a welcome aspiration to create a Lee Valley wide heat network. The Edmonton EcoPark is supported as the preferred location as the supply hub which</p>	Not specified	Not specified	Not specified

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							<p>will serve Blackhorse Lane as well as the other growth areas in the Upper Lee Valley opportunity area. There is a long term potential for inter-connection to a 'London-wide' network including the Olympic Park and the emerging heat networks in the Royal Docks and London Riverside areas. These very significant investments in new network opportunities should be given emphasis in the AAP and be fully exploited. 31. The policy should be expanded to include: London Plan energy target as set out in London Plan Policy S.2 2010-2013: 25% improvement on 2010 building regulation 2013-2016 - 40 % improvement on 2010 building regulation 2016 - 2019 - as per building regulations 2019- 2031 : zero carbon</p> <p>Wording should be sufficiently flexible to reflect any changes in Building regulation or any subsections. Major development should select energy systems in accordance to the following hierarchy: -Connection to existing heat network -Sitewide CHP network -Communal heating and cooling Site's should be served from a single energy centre unless evidence is presented to demonstrate that this is not feasible in this instance</p>			

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
534011	Greater London Authority (Ms Sukhpreet Khull)	bhlps62	Site BHL2 South - Blackhorse Road/Hawarden Road	Not specified	Not specified	Not specified	Site BHL2 35. Given site BHL2 South's proximity to multiple bus stops with several bus routes serving a wide catchment area, the site does seem appropriate for the provision of a new secondary school. However, as part of any proposals it is expected that a transport assessment would need to consider the effect on bus capacity in the area and any necessary capacity enhancements would require mitigation at no cost to TfL in line with London Plan Policy 6.2. This should be reflected in the 'Access' section for this site.	Not specified	Not specified	Not specified
534011	Greater London Authority (Ms Sukhpreet Khull)	bhlps63	Site BHL7 - Billet Works	Not specified	Not specified	Not specified	Site BHL7 36. It is welcomed that the AAP recognises the need for developer contributions to be secured at site BHL7 (Billet Works) in order to increase bus capacity.	However, the Infrastructure Plan at section 5.2 should not reference the 158 route as the recipient of these contributions specifically, as depending on future demand it may be the case that any contributions are better spent on a different route such as the W11 or W1S.	Not specified	Not specified
760705	Highways Agency (Ms Felicity Drewett)	bhlps9	Introduction	Not specified	Not specified	Not specified	Thank you for your letter of 18 March 2013 inviting final comments from the Highways Agency regarding the above Area Action Plans (AAPs) for	Not specified	Not specified	Not specified

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							Blackhorse Lane and Walthamstow Town Centre. The Highways Agency (HA) is an executive Agency of the Department for Transport (DfT). We are responsible for operating, maintaining and improving England's strategic road network (SRN) on behalf of the Secretary of State for Transport. It is unlikely that there would be a material impact on the SRN from any proposed development in the AAPs, therefore we have no further comments to make at this final stage of consultation.			
760974	Hollivale Blackhorse Lane LLP (Agent: Miss Jane Richardson, BPTW Partnership)	bhllps23	Introduction	Not specified	Not specified	Not specified	The following sets out detailed representations submitted on behalf of our client Hollivale Blackhorse Lane LLP, on the Waltham Forest Local Plan Blackhorse Lane Area Action Plan (AAP) Proposed Submission Document, dated March 2013. These representations are submitted in support of the future redevelopment of Mandora Site, Blackhorse Lane for large scale residential-led mixed-use purposes. The detailed representations support the Submission Representation Forms and relate to Policy BHL4 (Household Sizes), Policy BHL7 (Neighbourhood Centre and Local Retail Parades) and Site BHL1 (Station Hub and Waterfront). The	Not specified	Not specified	Not specified

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							representations focus on the opportunities for the provision of a residential element of over 480 units and around 500 rooms of purpose built student accommodation, within a mixed-use redevelopment scheme at the Mandora Site, Blackhorse Lane, which forms part of the wider BHL1: Station Hub and Waterfront Opportunity Site, as designated in the emerging Blackhorse Lane AAP. The current proposals for the Mandora Site also include commercial floorspace including retail, studio and office, and community use space. The structure of the document includes a detailed review of each of the above mentioned policies. Policies BHL7 and Site BHL1 both relate to land uses and student accommodation and are therefore considered together.			
760974	Hollivale Blackhorse Lane LLP (Agent: Miss Jane Richardson, BPTW Partnership)	bh1ps24	Policy BHL4: Household Sizes	Not specified	Not specified	Not specified	The policy is linked to Strategic Objective 2, Core Strategy Policy CS2 (Improving Housing Quality and Choice), and draft Development Management Policy DM5 (Housing Mix). Strategic Objective 2 seeks to ensure a continuous supply of land and homes to meet a range of housing needs including affordable housing, family housing and accommodation	Not specified	Not specified	Not specified

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							<p>needs of specific groups, whilst offering a range of housing choices of high quality design. To achieve this objective Core Strategy Policy CS2 part (c) states that the Council will seek a range of home sizes and tenures in new development, prioritising the need for larger homes (3 bedroom +). Draft Policy DM5 sets out a borough-wide preferred housing mix. The policy is also linked to Objective 2 of the emerging Blackhorse Lane AAP, which seeks the provision of a range of high quality homes that attract families and the young and upwardly mobile to the area as part of a mixed and balanced community that also caters for local housing need. In bringing forward the Blackhorse Lane AAP, a housing mix specific to sites within the Blackhorse Lane area is given, which differs from that set out in draft Policy DM5. The Preferred Options Version of the Blackhorse Lane AAP (August 2011), the document prior to the current Proposed Submission Version, set out in its Policy BHL3 (Household Sizes) that: A range of household sizes will be required in new developments in the interests of creating a mixed community. This will be negotiated on a site by site</p>			

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							<p>basis, with the Councils Preferred Dwelling Mix (as set out in the Development Management Policies DPD) used as a starting point. To meet housing need, a higher proportion of family housing will be sought on sites other than Site BHL1: The Station Hub. Where a significant amount of one and two bedroom properties are proposed, generous room sizes should be provided in the interests of securing a high quality scheme. This policy was then redrafted and renumbered following consultation to form Policy BHL4 (Household Sizes) in the Proposed Submission Document, the subject of these representations. Policy BHL4 now states the following: A range of household sizes will be required in new developments in the interests of creating a mixed community. Our standard requirements are set out in Development Management Policy DM5 (Housing Mix). Cases in Blackhorse Lane where we will consider deviating from this include: A) Site BHL1 (Station Hub and Waterfront) and Site BHL2 North (Car Wash Site); a higher proportion of one and two bedroom properties will be acceptable; provided that</p>			

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							<p>proposals offer generous room sizes and amenity space. In the interests of securing a high quality scheme at these landmark locations, at least 30% of dwellings at this site must have 3 or 4 bedrooms. B) More peripheral locations, such as Site BHL7 (Billet Works); where a higher proportion of family housing will be sought. We object to the revised wording of Policy BHL4 to include the requirement for 30% family housing on Site BHL1 (of which the Mandora Site is a part), and consider the policy to be unsound, for two reasons. Firstly, we consider this percentage to be too high and therefore unreasonable for this site, situated in such a highly accessible and sustainable location, and that the policy requirement is at odds with other policy objectives in the emerging AAP; and secondly, we consider that the Council has failed to follow the correct procedure in introducing this revised policy requirement at such a late stage in the consultation process, without having previously suggested or consulted on this figure, and therefore is without full justification. We discuss these two points of objection in greater</p>			

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							<p>detail below. Delivery of Housing Mix in the Masterplan We consider that the 30% family housing (3 or 4 bedrooms) requirement in relation specifically to Site BHL1: The Station Hub and Waterfront is too high and too restrictive for this site, which is situated in a highly sustainable location, and is contrary to the other policy objectives for the wider Blackhorse Lane area. The issue of housing mix needs to be seen in conjunction with the wider strategic planning issues for this site, namely the need to achieve sufficient density of development to create a new place as envisaged by the masterplan in the emerging AAP and Draft Blackhorse Lane Urban Design Framework (August 2011), and a form of development that is compatible with the mixed use nature of the intended form of development and juxtaposition with the adjoining Strategic Industrial Land designation. Both the form of development promoted through the masterplan and surrounding uses, together with the proximity of the main road network and station, makes the housing mix inherently more suitable to predominantly non-family unit sizes. This approach is supported in the main text of</p>			

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							<p>Section 3.2 of the Proposed Submission AAP, which states that sites BHL1 (Station Hub and Waterfront) and BHL2 North (Car Wash Site) are considered to offer a unique opportunity for higher density, smaller properties suitable for young professionals that could be attracted to an attractive waterfront development offering easy access to Central London. We consider that, in the case of Site BHL1, the proposed block structure, building heights, density, and overall illustrative masterplan layout for the site, as set out in the Draft Blackhorse Lane Urban Design Framework, does not support a large proportion of family housing. It would not be possible, for example, to provide for the level of family sized private amenity space provision, which would be required. In recent discussions regarding the redevelopment of the Mandora Site, the Council has pressed for a greater level of ground floor commercial frontage within the scheme (in respect of Hookers Road along the northern site boundary in particular). This further demonstrates the desire for a greater level of mixed use development that would create an environment that would be incompatible with family housing</p>			

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							<p>layouts and street formats, and would favour non-family higher density housing. Specifically in Hookers Road, family units would have to be removed to facilitate commercial frontage.</p> <p>Furthermore, we consider that the requirement for 30% of units on Site BHL1 to be family-sized units is unreasonable, given the Council's calculations are based on unit numbers rather than habitable rooms or floor area, as is more common in London borough policies. If the 30% unit figure were translated to floorspace, we estimate that the requirement for the provision of family housing on Site BHL 1 would be between 40%-45% of the scheme. This level of provision is neither reasonable for this site in terms of achieving the other objectives of the AAP and Urban Design Framework, such as higher density housing at accessible locations, nor in terms of producing and delivering a viable scheme. Precedent One recent significant redevelopment scheme within the Blackhorse Lane AAP boundary has been approved with a level of family housing provision below the indicative targets provided as set out in both draft Policy DM5 and Policy BHL4. The scheme at</p>			

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							<p>designated Site BHL6: Webbs Industrial Estate (LPA ref: 2011/0984), to the north east of Site BHL1, was approved subject to the signing of a S106 legal agreement, in November 2011, with 20% 3-bedroom+ unit provision. Although the 30% provision target of Policy BHL4 does not relate to Site BHL6, it is in fact the higher provision target set out in Policy DM5 of the draft Development Management Policies DPD which applies. Despite this, and the fact that the location of Site BHL6 is further from the Blackhorse Road transport hub than Site BHL1 and is therefore in a less accessible and sustainable location, the scheme at Site BHL6 was approved with 20% provision of family housing. Given that the development at the less accessible Site BHL6 was permitted, it is clear that a requirement for at least 30% provision of 3- bedroom+ units at Site BHL1 is unreasonable. Consultation Process As discussed, the AAP policy regarding Household Sizes has been revised, and renumbered, following consultation of the Preferred Options AAP document (August 2011). In summary, Policy BHL3 of the Preferred</p>			

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							Options AAP allowed for a significantly lower level of family housing provision on Site BHL1 than set out in draft Policy DM5; which was then revised to become Policy BHL4 in the Proposed Submission AAP, and now requires at least 30% of dwellings on Site BHL1 to be family units. The Preferred Options AAP set out the two options that Officers had considered in formulating the preferred policy for consultation. Neither Option A nor B suggested a specific target figure for the provision of family-sized units, and indeed the chosen option, option B, states that higher density developments would be expected at sites closest to Blackhorse Road Station and that Higher density developments could mainly provide for young single people/couples, whilst larger, more suburban developments could better cater for families. Public consultation on the Preferred Options document was undertaken between August and September 2011, and from this consultation, the Council has drafted the Proposed Submission Version (March 2013). A review of the Public Consultation Report (December 2012) for the			

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							Preferred Options AAP document, shows that none of the representations made, or the Council Officers responses to the representations, regarding the then Policy BHL3 suggested a 30% family housing figure be introduced into the policy wording. Furthermore, all of the relevant representations supported the flexibility allowed for in Policy BHL3 in terms of negotiating unit size mix on a site-by-site basis. The 30% figure was neither suggested at the Issues and Options stage of consultation nor the Preferred Options stage, and so we consider that this essentially constitutes a new approach, not consistent with previous consultation issues and options for the site, and inconsistent with the wider masterplan objectives. The revised policy, as part of the Proposed Submission AAP, was then approved by Members of the Cabinet at the meeting on 15th January 2013, for publication and consultation, with no recognition given in either the Officers Report to Cabinet or the meeting minutes, to this change in policy. Similarly to the Preferred Options document, the supporting text in the Proposed Submission document considers the evidence			

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							<p>base as the basis for the draft policy. The supporting text of the Proposed Submission AAP states that the Boroughs Housing Needs Assessment and Strategic Housing Market Assessment (2012) shows a need to prioritise larger affordable housing in the Blackhorse Lane area, as was the conclusion of the Boroughs Housing Need and Market Survey (2007), in the Preferred Options AAP. Although the evidence base upon which the draft policy has been based has been updated during the consultation process, both versions of the AAP have concluded that despite this need for family housing in the area, sites closest to the Blackhorse Road Station, including Site BHL1, should provide higher density development with a significant amount of 1 and 2 bedroom properties. In short, no indication or justification has been given for the sudden change in policy from allowing lower levels of family housing on the BHL1 Site to the introduction of a requirement for at least 30% family housing provision. As a matter of principle, having regard to planning policies and procedures, we believe that introducing an alternative draft policy at this late stage, which is</p>			

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							not in accordance with the previous versions of the document, has not previously been consulted on, and is without full justification for introducing the policy restriction, is unreasonable. We therefore consider the policy to be unsound, and that the 30% requirement should be removed from the policy.			
760974	Hollivale Blackhorse Lane LLP (Agent: Miss Jane Richardson, BPTW Partnership)	bh1ps21	Policy BHL4: Household Sizes	Yes	No	Justified	Policy BHL4 of the Proposed Submission Version AAP now contains a requirement for residential development on Site BHL 1 to provide at least 30% family sized (3 and 4-bedroom+) units. We therefore consider the policy to be unsound for the following two reasons: i) The 30% figure is too high and too restrictive for this site, in this highly accessible location, and if translated to a measurement by floorspace rather than units, this would equate to far greater provision onsite. This goes against other objectives in the AAP and Local Plan, in particular for higher density development in this sustainable location, and there is also precedent to demonstrate a lower level of family housing has been found acceptable on a site within the AAP boundary, but in a far less sustainable location. ii) The 30% figure has not been previously	We request that the reference to a minimum of 30% 3 and 4-bedroom+ units on Site BHL 1 be removed from Policy BHL4, and that the policy allow for lower levels of family sized housing on this site, in line with the previous policy consulted on, and in line with other policy objectives in the emerging MP and Local Plan.	Yes	In order to ensure that lower levels of family sized units are allowed on Site BHL 1 to meet other policy objectives for this site and allow for sustainable development in this accessible location.

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							suggested or consulted on in the consultation process of the Blackhorse Lane AAP, and represents a change in direction in the policy, where it previously allowed for lower levels of family housing on Site BHL 1.			
760974	Hollivale Blackhorse Lane LLP (Agent: Miss Jane Richardson, BPTW Partnership)	bh1ps25	Policy BHL7: Neighbourhood Centre and Local Retail Parades	Not specified	Not specified	Not specified	Policy Context As you will be aware, an application has been made, on behalf of Hollivale Blackhorse Lane LLP, for the redevelopment of the Mandora Site, which forms a part of the designated opportunity Site BHL1: Station Hub and Waterfront, as set out in the emerging AAP document. This site designation sets out the preferred land uses for BHL1, as follows: Mixed use; Approximately 1,000 new homes; Approximately 4,550sqm of commercial space including: - Retail (with no single unit having a net floor area larger than 1,000sqm); - B1 business space; - Social infrastructure; A new linear park; and Public open spaces. Part of the Mandora Site and the wider BHL1 Site, also falls within the Blackhorse Lane Neighbourhood Centre Boundary as designated in the Waltham Forest Core Strategy and within Policy BHL7 (Neighbourhood Centre and Local Retail Parades) of the Proposed Submission AAP	We therefore consider that the inclusion of student accommodation within the Site BHL1 designation and within Policy BHL7 is required to be consistent with local, regional and national policy objectives, and would be fully justified in helping to deliver regeneration at the BHL1 Site, as well as support the local economy and facilities intended to be provided in the Neighbourhood Centre.	Not specified	Not specified

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							<p>document. Policy BHL7 sets out the following uses as being acceptable within the Neighbourhood Centre: Focussing new A1-A4 and D1-D2 uses along the ground floor of the Forest Road Neighbourhood Retail Parade; Resisting proposals for new A5 units and avoiding betting shops; Restricting the net floor area of individual retail units to 1,000sqm; Ensuring the retention of the Standard Public House and Music Venue; and Ensuring the provision of enhanced public realm and new open spaces. While both of these policies advocate mixed use development and town centre uses on Site BHL1, and neither prohibits student accommodation (Sui Generis), we consider that the policies should expressly include student accommodation within the acceptable uses on Site BHL1 and within the Neighbourhood Centre. Section 6 of the National Planning Policy Framework (NPPF) requires that boroughs make provision for a range of housing needs. In addition, London Plan Policy 3.8 (h) states that local authorities in preparing their LDF should recognise the strategic and local requirements for student accommodation</p>			

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							<p>meeting a demonstrable need by working closely with stakeholders in higher and further education. Paragraph 3.52 highlights the requirement for some 18,000-27,000 places for student accommodation over the 10 years to 2021 and that new provision of student accommodation may also tend to reduce pressure on other elements of the housing stock currently occupied by students especially in the private rented sector. We consider that the designation of Site BHL1 for redevelopment provides an ideal opportunity for the provision of student accommodation in the Borough, in line with national and London Plan policy; and that Policy BHL7 and the land use designations for Site BHL1 are unsound without the inclusion and promotion of student accommodation in this location. An element of student accommodation is included in the current planning application submission for the redevelopment of the Mandora Site, and it is on this basis that we set out our reasons for considering that student accommodation (Sui Generis) should be included and promoted as an acceptable use in this location. Compatible Use We consider the student</p>			

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							<p>accommodation proposed at the Mandora Site falls within the Sui Generis Use Class, but is essentially a residential-type development. Residential uses are acceptable in town centres, as are commercial and community uses, as set out in the National Planning Policy Framework (NPPF), and we therefore consider student accommodation to be an appropriate use to be situated within the Neighbourhood Centre boundary set out in Policy BHL7. Further, this use would allow for the retention of commercial uses and active frontage at ground floor level, but would also encourage a younger population in the area, maintaining and supporting the vibrancy and vitality of the Centre, as is the objective of national policy.</p> <p>Demand for Student Accommodation As included in the planning application submission for the redevelopment of the Mandora Site, a Student Accommodation Demand Study (February 2013) has been undertaken by Jones Lang LaSalle, demonstrating the appropriateness of the site as a location for student housing, and the need for student accommodation in Greater</p>			

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							<p>London. There are 18 universities and higher education colleges within a 30 minute travelling distance from the site, which is widely accepted as the distance students are willing to travel to reach their place of study. The BHL1 Site is ideally located to serve the main universities in London, in addition to Walthamstow College. Most of the universities in London do not have enough purpose built student accommodation and can often only provide accommodation to first year students (16.2% of full time students). There is a large demand for high quality, secure student accommodation in London, and currently demand far outweighs the supply. The report demonstrates there is clearly a demand for student housing in London, and the London Plan requires the London boroughs to aid in accommodating this provision where appropriate.</p> <p>Benefits of Student Accommodation The Student Accommodation Demand Study also sets out the substantial benefits that managed student accommodation can bring to an area. In summary, these benefits are:</p> <ul style="list-style-type: none"> • Spending “ a report by the Department for Innovation and 			

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							<p>Skills (2007/2008) shows that students spend £6,000-£6,800 per annum on living costs (excluding housing costs). Allowing for 3% inflation between 2007 and 2012 suggests students currently spend £7,000- £8,000 per annum, much of which is spent in the local area. In addition, London attracts a large number of international students, who bring more than £2.5bn to London. Low demand on community infrastructure student housing produces no demand on local schools and low demand on the NHS. There is also a low demand on facilities such as health centres and sports facilities, which they can use at their universities. Activity busier, more populated streets create a safer environment, particularly in new regeneration areas. Involvement student volunteers contribute greatly to many charity organisations. Skills studies show that many students stay locally on graduating from university, providing a source of highly skilled local residents for the future. Investment student housing is the front-runner of many regeneration schemes and demonstrates viability to other investors, attracting further investment to the local area.</p>			

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							Relieving HMO pressure purpose built halls of residence reduce the pressure on houses in multiple occupation (HMOs) and free up housing for other residents in the area. Compliance with Policy Objectives The Study therefore clearly shows demand for purpose built student accommodation, meeting policy requirements elsewhere in the Local Plan and in the London Plan, and demonstrates that student accommodation brings significant benefits to an area, not least of all boosting the local economy and supporting the function of the Blackhorse Lane Neighbourhood Centre. Provision of purpose built student accommodation on Site BHL1 would also support the objectives of the emerging AAP. In particular, it is identified in the Issues and Opportunities section of the Site BHL1 designation that this site could attract the upwardly mobile to the area and The mass of people and disposable income this would generate in the area can also help the provision of high quality shops and services in the neighbourhood centre .			
760974	Hollivale Blackhorse Lane LLP (Agent: Miss	bhlps22	Policy BHL7: Neighbourhood Centre and Local	Yes	No	Justified; Effective	London Plan Policy 3.8 states that local authorities in preparing their LDF should recognise the strategic and local requirements	It is necessary to include reference to, and make provision for the development of,	Yes	In order to ensure the provision

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
	Jane Richardson, BPTW Partnership)		Retail Parades				for student accommodation meeting a demonstrable need by working closely with stakeholders in higher and further education. We consider the land use designations included with Policy BHL7 (Neighbourhood Centre and Local Retail Parades) should include and promote student accommodation (Sui Generis) in this location, to help meet London Plan policy requirements for student accommodation provision in boroughs across London. Without this policy provision for student accommodation, we consider Policy BHL7 to be unsound. Please see the accompanying Detailed Representations.	student accommodation within Policy BHL7, in order to comply with London Plan policy and meet an identified strategic need within London.		of student accommodation to meet the strategic requirements of the London Plan and to contribute the economic growth.
760974	Hollivale Blackhorse Lane LLP (Agent: Miss Jane Richardson, BPTW Partnership)	bhyps20	Site BHL1 - Station Hub and Waterfront	Yes	No	Justified; Effective	London Plan Policy 3.8 states that local authorities in preparing their LDF should recognise the strategic and local requirements for student accommodation meeting a demonstrable need by working closely with stakeholders in higher and further education. We consider the land use designations/opportunities for Site BHL 1 should include and promote student accommodation (Sui Generis) in this location, to help meet London Plan policy requirements for student accommodation provision in boroughs across London. Without	It is necessary to include reference to, and make provision for the development of, student accommodation within the BHL 1 Site, in order to comply with London Plan policy and meet an identified strategic need within London.	Yes	In order to ensure the provision of student accommodation to meet the strategic requirements of the London Plan and to

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							this policy provision for student accommodation, we consider the Site BHL 1 designations to be unsound. Please see the accompanying Detailed Representations.			contribute the economic growth.
682192	Industrial Property Investment Fund (Agent: Mr Tudor Jones, GVA)	bhlps35	Introduction	Not specified	Not specified	Not specified	We look forward to confirmation of receipt of these representations at the earliest opportunity and would welcome the opportunity to meet with officers to discuss any part of our representations as required. We also reserve the right to request to be heard by the appointed examiner at the public examination when details of this are finalised.	Not specified	Yes	To explain and expand upon our position
682192	Industrial Property Investment Fund (Agent: Mr Tudor Jones, GVA)	bhlps27	Introduction	Not specified	Not specified	Not specified	We respond on behalf of our client, the Industry Property Investment Fund (C/O Legal & General Property), which is the freehold owner of the Ferry Lane Industrial Estate. You will find attached a completed response form that accompanies the following representation. Our client has been working hard with the Council in the preparation of the Blackhorse Lane Area Action Plan (AAP) and Urban Design Framework and significant progress has been made to date on the documents that will alleviate many barriers to new development. Our client has previously commented on the	Not specified	Not specified	Not specified

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							Blackhorse Lane AAP Preferred Options Document (consultation 22/08/11 to 30/09/11). In general, we support the principle of adopting an Area Action Plan for Blackhorse Lane to add clarity to development objectives in this area of Waltham Forest. We consider the document to be legally compliant. However, having reviewed the document, as currently drafted we consider that it is not sound. We provide the following comments and suggested amendments which we consider necessary to ensure the soundness of the document, particularly in seeking to provide consistency with national policy, namely the delivery of sustainable development and growth. In addition, you will find attached a completed response form that accompanies the following representations.			
682192	Industrial Property Investment Fund (Agent: Mr Tudor Jones, GVA)	bhyps28	Policy BHL3: Housing Densities	Yes	No	Consistent with national policy	We support the Councils recognition that the area surrounding Blackhorse Road Station can deliver higher density residential development. We are of the view that this should however be clarified to also refer to key opportunity sites. Development on sites is to be optimised and where no environmental, infrastructure or townscape harm arises, higher	Recommendation On the basis of the above, we suggest the following re-wording: Higher density residential development should be concentrated on sites surrounding Blackhorse Road Station, the identified opportunity sites and other sites where	Yes	To explain and expand upon our position

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							<p>densities should not be resisted if best use is to be made of scarce urban brownfield land. It should therefore be for analysis of these key factors to determine the scale of buildings that might arrive on any particular site on a scheme specific basis. As with the density guidelines set out under the London Plan, density ranges should be applied flexibly and with regard to the site specific circumstances.</p>	<p>considered appropriate. Key considerations will be: A) the existing PTAL covering the site; B) any planned improvements in provision of shops, services and public transport in the locality; C) the need to provide a high quality design; including generous room sizes, storage space and communal gardens where appropriate. As a minimum, the standards set out in Development Management Policies DM7 (Amenity and Internal Space) and DM8 (Housing Quality and Accessibility) should be met.</p>		
682192	Industrial Property Investment Fund (Agent: Mr Tudor Jones, GVA)	bhlps29	Policy BHL4: Household Sizes	Yes	No	Consistent with national policy	<p>Commentary We support the Councils recognition that in order to achieve regeneration objectives, there are instances in the Blackhorse Lane area where they will consider deviating from the standard requirements for housing mix and sizes set out in Development Management Plan. We do not support that at least 30% of dwellings at Site BHL1 (Station Hub and Waterfront) and</p>	<p>Recommendation On the basis of the above, we suggest the following re-wording: A range of household sizes will be required in new developments in the interests of creating a mixed community. Our standard requirements are set out in Development</p>	Yes	To explain and expand on our position

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							Site BHL2 North (Car Wash Site) must have 3 or 4 bedrooms. The policy should recognise those instances where it is not practical or feasible to maximise family accommodation. As such greater flexibility should be added to allow for those instances where it is not always practical or feasible to provide a target of family sized accommodation.	Management Policy DM5 (Housing Mix). Cases in Blackhorse Lane where we will consider deviating from this include: A) Site BHL1 (Station Hub and Waterfront) and Site BHL2 North (Car Wash Site); a higher proportion of one and two bedroom properties will be acceptable; provided that proposals offer generous room sizes and amenity space. In the interests of securing a high quality scheme at these landmark locations, developers should seek that up to 30% of dwellings at this site must have 3 or 4 bedrooms. B) More peripheral locations, such as Site BHL7 (Billet Works); where a higher proportion of family housing will be sought.		
682192	Industrial Property Investment Fund (Agent: Mr Tudor Jones, GVA)	bhlps30	Policy BHL5: Affordable Housing	Yes	No	Consistent with national policy	Commentary Viability considerations should be a key factor in the determination of planning applications and assessed in a manner which encourages delivery. The	Recommendation On the basis of the above, we suggest the following re-wording: Core Strategy Policy CS2 (Improving	Yes	To explain and expand on our position

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							<p>consideration of viability is not stressed enough in the current drafting of affordable housing Policy BHL 5 and this risks sufficient development coming forward to meet identified need and the development objectives for the Blackhorse Lane area. Ensuring viability is a theme that underpins the NPPF. Paragraph 160 states that local planning authorities should work closely with the business community to understand their changing needs and identify and address barriers to investment, including viability. Paragraph 173 states: the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable. "As such, rather than repeating</p>	<p>Housing Quality and Choice), and Development Management Policy DM3 (Affordable Housing Provision sets the affordable housing requirements for the Borough for new development. We will consider deviating from the above policy position in cases that fall within the Blackhorse Lane AAP boundary on a site by site basis. Key consideration will be given two: A) Viability; B) Deliverability; C) Wider package of planning benefits; and D) The objectives for the Blackhorse Lane area. The mix of affordable units in terms of size and tenure should be in accordance with the Development Management Policy DM5 (Housing Mix and Policy BHL 4 above. Financial contributions to off site affordable housing will be accepted in exceptional</p>		

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							Core Strategy and Development Management policies, Policy BHL 5 should provide a greater emphasis on viability in order to deliver development in the Blackhorse Lane area. We also note the Policy BHL 5 states that financial contributions to off site affordable housing will only be accepted in exceptional circumstances, where it is not practical to provide affordable housing on site. Whilst we support the clarification of financial payment in lieu mechanisms in the Blackhorse Lane AAP, we consider that in order to achieve viable schemes with the maximum reasonable amount of affordable housing, greater flexibility should be added to the wording of this policy. In addition, the need for deferred contributions should be applied with flexibility, having regard to other key priorities, such as attracting investment in order to deliver regeneration objectives and promote growth in Blackhorse Lane.	circumstances, where it can be demonstrated that it is not practical or viable to provide affordable housing on site. The need for deferred contributions will be applied flexibly in the AAP boundary.		
682192	Industrial Property Investment Fund (Agent: Mr Tudor Jones, GVA)	bhlps31	Policy BHL6: Employment	Yes	No	Consistent with national policy	Commentary Clarification should be provided that the proposed criteria based assessment is not applicable to the key opportunity sites identified in the AAP where preferred land uses have already been identified. Without the	Recommendation On the basis of the above, we suggest the following re-wording: C) requiring redevelopment of any other existing	Yes	To explain and expand on our position

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							change, this policy could restrict residential development from coming forward in key areas which have been identified for new housing.	employment land, with the exception of the identified opportunity sites, for non employment or training purposes to demonstrate that the existing space is no longer fit for purpose, and has no reasonable prospect of coming forward for future employment use. Evidence should be provided that: - the site has been appropriately advertised at a price in line with local market values, with terms and conditions that are reasonable and attractive to potential business - all opportunities to re-let for employment generating uses have been adequately explored, including where this requires flexibility in terms of sub-dividing existing floorspace.		
682192	Industrial Property Investment Fund (Agent: Mr Tudor)	bhlps32	Policy BHL7: Neighbourhood Centre and Local Retail	Yes	No	Consistent with national policy	Commentary In order to create a new neighbourhood centre for Blackhorse Lane, we support the Councils approach to focus new A1-A4 and D1-D2 to the area	On the basis of the above, we suggest the following addition to planning policy: C) Outside of the	Yes	To explain and expand on our

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
	Jones, GVA)		Parades				surrounding Blackhorse Road Station. However, as well as encouraging the development of new town centre uses within the Boroughs designated centre, Policy BHL 7 should acknowledge that opportunity exists within the wider Blackhorse Lane area to introduce new retail and support services (such as a local convenience store) to serve the everyday needs of a growing population. In order to create mixed and sustainable communities with a sense of place and activity it is important to reduce the need to travel and provide the supporting infrastructure that they require to create a dynamic interactive community. As such, new forms of retail should be able to be located outside of identified centres where appropriate.	neighbourhood centre and local retail parades at Higham Hill and Billet Road, individual convenience retail units as part of mixed use developments are acceptable, provided that they do not prejudice the success of the neighbourhood centre.		position
682192	Industrial Property Investment Fund (Agent: Mr Tudor Jones, GVA)	bh1ps33	Policy BHL8: Design and Local Character	Yes	No	Consistent with national policy	Commentary We support the Councils aspiration that new developments in Blackhorse Lane should ensure the highest standard of urban and architectural quality which responds positively to local character and context. We do not support the statement at part d) of Policy BHL8 that building heights should respect the existing built context and adjacent landscape features, and suggest instead	Recommendation On the basis of the above, we suggest the following re-wording: D) ensure appropriate building heights have regard to the existing built context and adjacent landscape features. Development proposals for taller buildings should be directed to the key	Yes	To explain and expand on our position

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							<p>words to the effect that new buildings should have regard to the scale and context of existing building heights. This wording will avoid artificially stifling architectural innovation in terms of contextual response particularly where there is potential for significant townscape change. The use of a range for building heights can often be useful to help guide developers to understand what heights are likely to be appropriate in certain areas. However, we consider that the heights of new buildings should not be pre-determined by rigid policy and should be instead considered on a site by site basis, taking into account the relevant townscape, views and amenity factors. This approach will provide sufficient flexibility and allows for future changes in townscape circumstances, in an area which has been identified for significant growth. While we support that taller buildings should be directed to the key gateway sites of BHL 1: The Station Hub and Waterfront, we consider that an upper limit should not be set, but should be subject to the design quality of emerging proposals and their relationship with the wider urban context of the area. As such we suggest removing the height</p>	<p>gateway site of BHL 1: The Station Hub and Waterfront, and subject to an exemplary standard of design.</p>		

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							range from the policy wording.			
682192	Industrial Property Investment Fund (Agent: Mr Tudor Jones, GVA)	bhmps34	Site BHL1 - Station Hub and Waterfront	Yes	No	Consistent with national policy	We support the allocation of the Site BHL 1 Station Hub and Waterfront as a key opportunity site, suitable for mixed use incorporating new homes and commercial space. However there are three comments that we wish to make that we set out below: 1) Preferred land use - Retail We support the view that in order to create an attractive and welcoming environment around the linear park, there may be a need for some small scale commercial uses such as cafes outside of the neighbourhood centre as part of mixed use developments, in order to secure an active frontage and bring life to this communal space. As identified above, we consider new retail uses should be able to locate out of the neighbourhood centre. As such there should be an acknowledgement within the wording that opportunity exists within Site BHL 1 outside of the neighbourhood centre to introduce new retail and support services (such as a local convenience store) to serve the everyday needs of a growing population. 2) Issues / Opportunities “ Employment “ Redevelopment of Employment Land Clarification should be	However relocation of businesses is not always possible. It is vital that if this criteria cannot be met it does not restrict redevelopment of a site. As such, allowance should be given in instances where it is not possible to relocate business. As such, we suggest the following re-wording: Any new development proposals will therefore need to assist in the relocation of existing employers locally where possible to ensure our objective that Blackhorse Lane is a place to do business and for creative businesses is not compromised. Similarly, relocation of other existing businesses within the borough, such as those at Ferry Lane Industrial Estate, will be sought where possible.	Yes	To explain and expand upon our position

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							provided that the proposed criteria based assessment for the redevelopment of employment land is not applicable to Site HBL 1 - Station Hub and Waterfront, where land use has already been earmarked for residential led mixed use development. Without the clarification, the Policy BHL 6 could restrict residential development from coming forward opportunity area. 3) Issues / Opportunities Employment Redevelopment of Employment Land. To ensure the Councils objectives that Blackhorse Lane remains a place to do business accepted that the Borough should seek to try and relocate existing businesses locally.			
150955	Lee Valley Estates (Agent: Mr Simon Marks, Montagu Evans LLP)	bhyps14	Introduction	No	No	Justified; Effective	Introduction We write on behalf of our clients Lee Valley Estates and Workspace Group, who are respectively the freehold owners of Silver Birch & Landmark House and Uplands Business Park. These land holdings, which amount to an area of approximately 20 acres, fall within the Blackhorse Lane Area Action Plan (AAP) boundary, see plan attached at Appendix 1. Please find below our representations in relation to the Blackhorse Lane AAP Proposed Submission version (March, 2013). The following representations should	Not specified	Yes	To provide the Inspector with the full facts of our case and agree amendments to the AAP

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							also be read in conjunction with our previous representations, dated 30 September 2011, in respect of the Preferred Options version of the Blackhorse Lane AAP (August 2011).			
150955	Lee Valley Estates (Agent: Mr Simon Marks, Montagu Evans LLP)	bh1ps15	Paragraph 2.1.1	No	No	Justified; Effective	We wish to outline our support the Council's overarching vision for the Blackhorse Lane area as stated at paragraph 2.1.1 . In particular we strongly support the promotion of this area for regeneration to comprise new sustainable communities including housing, interspersed with small-scale local business/commercial spaces, local amenities and public open space. We consider that the vision advocated by the AAP is consistent with national planning policy and specifically paragraph 14 of the National Planning Policy Framework (2012) (The Framework) which champions the principle of sustainable development as the golden thread that should run through both plan-making and decision-taking. The eight objectives set out on page 15 of the AAP are considered to be well conceived and again consistent with The Framework.	Not specified	Yes	To provide the Inspector with the full facts of our case and agree amendments to the AAP
150955	Lee Valley Estates (Agent: Mr	bh1ps16	Policy BHL2: Housing Growth	No	No	Justified; Effective	We are encouraged that this version of AAP has been amended to increase the housing	In order to make the AAP sound we suggest that Policy BHL2 is	Yes	To provide the

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
	Simon Marks, Montagu Evans LLP)						delivery targets from 2000 to 2300 new homes by 2026. However, as noted at paragraph 3.2.3 of the AAP, the adopted Core Strategy (2012) advocated the provision of up to 2500 new homes within the Blackhorse Lane area. As currently drafted we consider that Policy BHL2: Housing Growth is unsound as it is not positively prepared. Housing delivery targets for London Borough of Waltham Forest have been informed by the London Plan (2011) and GLA Strategic Housing Land Availability Assessment (2009). Policy 3.3(B) of the London Plan makes clear that the housing targets are minimums and at part (D) encourages Borough's to exceed the minimum targets.	amended (amendments in italics and underlined) as follows: "As a key growth area, we will seek to deliver at least 2500 new homes by 2026 "Furthermore, the justification for increasing housing growth targets within the Blackhorse Lane is of relevance as the current targets take no account of the potential for our client's site to contribute towards housing growth over the Plan period (up to 2026) and beyond.		Inspector with the full facts of our case and agree amendments to the AAP
150955	Lee Valley Estates (Agent: Mr Simon Marks, Montagu Evans LLP)	bhpls17	Policy BHL6: Employment	No	No	Justified; Effective	We support the Council's approach through Policy BHL6 to incorporate new employment as part of mixed use developments, particularly those within the opportunity sites. However, we remain concerned that the Council's approach to the long term land use planning of the Blackhorse Lane SIL, as set out at paragraphs 3.3.10 - 3.3.15 of the MP, remains unaltered from previous iterations. The current business character of the area has long departed from its	In conclusion, we would request that the Council revise its approach to maintaining the designation of the site as SIL in favour of a mixed use designation comprising B1 and residential use.	Yes	To provide the Inspector with the full facts of our case and agree amendments to the AAP

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							<p>industrial roots and simply cannot be retrieved. As owners of major land and property holdings in the area, with a strong interest in new regenerative investment, we consider that the future can only be driven by forms of mixed use development which in fact will deliver more employment, housing - and environmental - outcomes than the AAP envisages, and which will be wholly frustrated by it in its current form. We remain of the opinion that the continued designation of Silverbirch House and Landmark House as SIL is unsound and we have similar concerns in respect of Uplands Business Park. The evidence base supporting the conclusions of the MP, and in particular the Blackhorse Lane Strategic Industrial Location (SIL), are predicated on the recommendations of the London Borough of Waltham Forest Employment Land Review (2009). We are particularly concerned about the long term effects of retaining the SIL designation upon Silverbirch House and Landmark House. The Council's ELR (2009) provides no assessment of the condition of these office buildings. Given that the MP uses this information as an evidence base, the framework</p>			

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							<p>established by the MP will fail to deliver the stated economic objectives for the Blackhorse Lane. The MP recommends a set of local changes in industrial land designations, which tinker with marginal areas and issues and fails to get to grips with the how the tired industrial infrastructure might address business and employment needs of the new century, albeit there are slightly hackneyed references to green industry. Simply safeguarding employment land will not generate jobs, which is a key planning objective at the strategic and local level. The Council's Employment Land Review (ELR) (2009) is now some five years old and we consider that this no longer constitutes an up-to-date or proportionate evidence base as required by The Framework. To this end we consider that the MP, and in particular its approach to the land use planning of the area currently proposed to be retained as SIL, is unsound as it is not justified. Justification for Further Release of SIL within Blackhorse Lane Evidence Base Based upon the ELR (2009), the Council's Core Strategy (2012) accepts the managed release of up to 24.5 ha over the Plan period to 2026. However, at paragraph</p>			

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							<p>11.9 of the Core Strategy it states that within the Blackhorse SIL the area to be released for mixed use development is less than advocated by the ELR (2009). This suggests there is potential for greater release of SIL within the Blackhorse Lane than currently proposed by the Core Strategy and subsequently reflected within the AAP. As already outlined above, we consider this evidence base to be out dated, and indeed the recommendations of the ELR (2009) at section 8.6 suggest that the ELR should be updated at least every five years to take account of changes in market conditions and land use changes. Were a further ELR commissioned by the Council this may conclude that additional industrial land could be released due to lack of demand.</p> <p>Furthermore, and with specific reference to Landmark House and Silverbirch House which are large scale office buildings, the objective of SIL policy as set by the London Plan policy 2.17 is to protect, promote and manage London's reservoir of industrial and related uses. Evidently Silver Birch House and Landmark House, as office buildings, are not the type of uses which a SIL</p>			

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							<p>should look to protect. Paragraph 4.5(i) of the Land for Industry and Transport SPG clearly states "PILs will not normally be suitable for B1 (a) office uses". In light of the existing use of these buildings it is unclear why the AAP has decided to continue to include uses that are not ideally compatible with the wider SIL designation of this area? In light of the above we consider the AAP as currently drafted is unsound as it is not justified and should remove Landmark House and Silverbirch House from the SIL designation in order to be made sound. Land Ownership and Current Market Conditions The next section of this response comprises commentary on Lee Valley Estates and Workspace Groups land interests, and as both are employment/industrial developers, their general observations on market conditions within the Blackhorse Lane area. In common with many areas of London and the South East, the changing structure of manufacturing and the economic base has seen large single use sites decline, leaving a swathe of buildings that are not readily adaptable. The Uplands site is typical of this process producing a site that has a variety of buildings.</p>			

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							<p>Offices that functioned as a head quarters as well as a range of single storey large span, north light units used to accommodate the manufacturing activities of that business. Silver Birch House and Landmark House Office complex Lee Valley Estates owns and manages the office complex which was the former HQ of Bush Boake Allen a manufacturing company. Built in 1969 the office complex comprises 6,700 sq.m of floor space. The complex is divided into two blocks Landmark House (2,579 sq.m) which has been vacant for two years and Silver Birch House (4,121 sq.m) which is currently occupied by the London Borough of Waltham Forest. The Council have served notice confirming that will not be renewing their lease and their intention is to vacate Silver Birch House within the next few months, leaving the entire office complex vacant. The location is at the rear of industrial property with little or no access to amenities. This is cited by the Council as a key factor for not renewing their lease. Uplands Business Park Overview Workspace Group owns and manages the Uplands Business Park, providing a range of building and spaces for small and medium enterprises. The</p>			

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							<p>existing use of the site and pattern of occupation is driven by the age and the complex of buildings that remain on site. The site now provides a total 26,500 sq.m of floor space available to let to SME's. The key issue that faces any investor is how the existing buildings and how they are configured sustain their value. The site has a diverse range of occupants spanning the public sector, institutional and entrepreneurial sectors. This creates an interesting dynamic between what the building was originally built for and how they managed to meet a changing market and client requirements. For example the following are typical of the current tenants and their activities. Public sector - The Metropolitan Police in a former factory/ industrial process unit (3300 m2). A sui generis use. Institutional - Waltham Forest College in the former site management office. (1190 m2). A D1 use in a B1 office building. Entrepreneurial - Blue Inc (A. Levy & Son), an online clothing retailer and distributor also with high street retail outlets. They occupy part former factory unit (4114 m2). And an unusual mix of use with a small part B1 for office/management space and a</p>			

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							<p>significant B8 use with low job yield. Market Conditions What this overview of occupation within Lee Valley Estates and Workspace Groups land holdings demonstrates is that the blanket industrial designation in both the AAP and indeed the draft Upper Lea Valley Opportunity Area Planning Framework do not capture the changes that have occurred within the site designation. Nor will the continuation of the allocation as SIL help future adaptation as it is a blanket classification that cannot facilitate the subtle rapid changes that occur in the market. The type of occupiers on the site illustrates a situation that is common across a wide variety of former industrial allocations, namely as the use of the building by occupiers move further away from the original, the adaptability of the building decreases. This, in a lot of cases, can be very positive in generating local clusters of economic activity, attracts investment and improves local GDP. Workspace's experiences across London shows this can happen, but is also reliant on other factors such as good public transportation connections and more significantly the quality of the</p>			

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							<p>existing buildings coupled to their adaptability. Of the current tenants on site it cannot be said that their business activities would sit happily within the defined allocation of industrial. Although the use classes B1, B2, B8 cover a wide range of business activities, the Police's and the educational activities do not. The Waltham Forest Employment Land Study (2009) suggests there is a marginal demand, of between 3.1ha and 3.7ha, for B1 space within the Borough, it is well documented that there is no demand for large scale office space in secondary locations outside central London, particularly of the quantum and quality available at this site. The Waltham Forest Employment Land Study (2009) suggests that main driver for the projected expansion in demand for B1 offices will come from SMEs and start up companies; however the current supply of office space is deemed to be of relatively low quality and does not match the needs of modern 21st Century office occupiers. Landmark House has been marketed for over a year with little or no response which is partly due to the outdated design which makes it unsuitable for enterprise activity.</p>			

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							<p>Once Silver Birch House becomes vacant it will more than likely suffer the same fate as Landmark House and will remain vacant. Notably the Employment Land Study (2009) at page 88 does not recommend that this site should be protected to meet demand for B1 office floor space; however, it does suggest that demand could be met through the mixed use redevelopment of sites. This market perspective suggests that the allocation of the site and the wider Blackhorse Lane SIL should be changed, not least to reflect the current uses but to positively to allow a greater diversity of investment in development. At Uplands the key challenge is to sustain and improve the site and surrounding areas attractiveness to businesses for investment whilst having to operate within the following constraints: 1. The constraint imposed on the site by land use planning's rigidity and inability to respond to the dynamic economic changes that occur; 2. Quality, condition and age of the existing buildings; 3. Access configuration and demand for the type of buildings on the site; 4. The changing requirements of occupiers as the types of business in the SME sector</p>			

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							<p>evolve in response to economic change; and 5. The ability to respond and adapt the site/buildings in a viable way.</p> <p>Conclusion The future land use planning of Blackhorse Lane is currently under consideration at both a strategic and local level. This presents a unique opportunity to fully consider the opportunity this area presents and to appropriately consider how the Blackhorse Lane SIL area can also contribute achieving the regeneration objectives for the wider AAP. We note that Uplands Business Park is identified as a discounted site within the AAP; however the area identified does not include Silverbirch House or Landmark House. We therefore urge the Council to defer submission of the AAP to the Secretary of State whilst it updates its evidence base and reconsiders the future land use planning of this part of the AAP. Failure to do so will simply blight the site for the next 10- 15 years and calls into question the effectiveness of the AAP in terms of achieving the stated regeneration and economic objectives. For the reasons outlined earlier in this representation we therefore consider the AAP to be unsound</p>			

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							<p>on the basis it is not justified or effective. In the event the Council decide to progress with submission of this AAP to the Secretary of State, we strongly recommend that the Council amend the AAP and specifically the Blackhorse Lane SIL designation in order to exclude Silverbirch House and Landmark House. Nevertheless, we are of the opinion that this revision would miss the opportunity to revisit the land use planning of the wider Blackhorse Lane SIL area. Below we set out the potential regeneration opportunity that could be realised were the land use planning for Uplands Business Park (including Silverbirch House and Landmark House) more positively prepared as recommended by The Framework. Upland Park Opportunity Opportunity Areas are defined as locations capable of delivering a significant number of jobs and homes. The London Plan (2010) indicates that the Upper Lee Valley is capable of accommodation 15,000 jobs and 9,000 homes. Blackhorse Lane is recognised as a growth location, suitable for some new housing development. This is principally because it is close to the tube; additionally it has a frontage to</p>			

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							<p>the Lee Valley Regional Park which offers excellent amenity. The area of SIL within Blackhorse Lane currently proposed for release appears to be driven by desire to minimise loss of industrial space, rather than changing requirements of SME occupiers, the ability to respond and adapt the site/buildings in a viable way, consideration of amenity for potential residents, or the residents of the adjoining communities who are separated from the Park by the industrial area. The current AAP appears to have limited ambitions in respect of creating a coherent place out of what is currently a suburban nowhere or any appraisal of the likely business future for the industrial land retained. In practice Blackhorse Lane evolved as a classic industrial enclave, planted in a then isolated corner of the Lea Valley in Victorian times, as part of Walthamstow's rich manufacturing history linked to the rich concentration of engineering innovation that drove the Valley industry almost to WW11. It is actually where London's first buses were designed and built. Today this context has wholly disappeared. Current employment in the area is largely non industrial and likely to</p>			

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							<p>depart. Probability that new investment will return to the area to create a successful industrial zone, let alone one which is compatible with surrounding park and housing, is nil. The AAP if successfully implemented is likely to generate an outcome which is sub optimal in terms of employment, housing and environment. An outcome of limited benefit to all stakeholders. There is a viable, potentially very successful alternative approach to the area which builds on its enormous strengths, in terms of transport and amenity, which embraces a substantial modern business and employment content, which will enhance the quality and build the image of the much wider area, and which is viable. It is based around a flexible approach to the industrial area, a richer mixed use solution and greater integration with the Park and the surrounding residential structure. The AAP must facilitate opportunity, not frustrate it. The employment uses contained within combined land holdings of Lee Valley Estates and Workspace, hereafter referred to as Upland Park, currently generate approximately 900 jobs (full and part time). As stated above when Waltham</p>			

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							<p>Forest Council leave the site this will almost half to approximately 500 jobs. The prospects of occupying the office buildings are unlikely as the office accommodation is no longer appropriate for contemporary requirements and the demand for the office accommodation of this type is limited in this location. The remaining land/buildings owned by Workspace Group are equally in poor condition and need to be regenerated in order to meet the contemporary requirements of B1, B2 or B8 uses. The redevelopment of this land for employment use in isolation would be unviable; however, if supported by a higher value use such as residential the prospects of a viable development would improve. Attached at Appendix 2 is a paper prepared by Local Economy Solutions. This paper considers the economic and employment benefits of redeveloping Upland Park for a mix of uses including B1 micro business space and residential. The conclusions of this paper are that a mixed use redevelopment comprising approximately 170,000 sq.ft (GIA) of B1 use, supported by 900 residential dwellings, would result in an employment gain on the site of</p>			

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							<p>between 700 and 970 jobs.</p> <p>Conclusion The AAP provides an opportunity to address some of the issues Lee Valley Estates and Workspace face in sustaining the economic vitality and investment in the Lea Valley especially at Blackhorse Lane. The long term future of Blackhorse Lane must be carefully considered. In our view and that of our clients, the continued designation of site would prejudice the wider regeneration objectives for the Upper Lee Valley i.e. delivering jobs and homes. The AAP appears to simply reinforce the recommendations of a local employment study rather than consider the strategic opportunities presented by the Blackhorse Lane area. In terms of responding to the objectives of the AAP clearly promoting mixed use redevelopment of the site would constitute a proactive planning response. Maintaining the current SIL designation of the site will compound the current constraints facing Lee Valley Estates and Workspace Group and condemn to site to continued degradation and under utilisation. We see the OAPF as an opportunity to engage with the Borough and Stakeholders in a debate about how the Blackhorse</p>			

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							Lane area can be re-positioned to not only sustain the provision of important employment generation, but wider benefits through investment in other uses.			
183754	Lee Valley Regional Park Authority (Mr Stephen Wilkinson)	bhmps51	Introduction	Not specified	Not specified	Not specified	Thank you for consulting the Regional Park Authority on the Proposed Submission version of the Blackhorse Lane Area Action Plan. As you are aware a significant area of the Regional Park lies within the Blackhorse Lane area defined by the Area Action Plan which 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-	Not specified	Not specified	Not specified

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							<p>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 the London Borough of Waltham Forest is 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 Blackhorse Lane Area Action</p>			

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							Plan was considered by the Authority's Lower Lee Valley Regeneration and Planning Committee on the 18th April 2013 at which Members approved the following comments as the Authority's formal response to the London Borough of Waltham Forest. Proposed Submission Version of the Local Plan Development Management Policies The Authority welcomes the changes that have been made to the Area Action Plan following the Preferred Options consultation in November 2011 and the addition of references to the Regional Park, the Authority and the Park Development Framework which are now included in the Proposed Submission document. In particular the inclusion of a reference to the Regional Park in the Vision statement where it is described as a unique resource for the borough integrated into a positive public realm framework, designed to encourage social interaction and creating access for all is welcomed.			
183754	Lee Valley Regional Park Authority (Mr Stephen Wilkinson)	bhlps48	Key diagram	Not specified	Not specified	Not specified	Please refer to the Park Authority's letter dated 26th April 2013 for details of the Authority's statutory remit and responsibilities. The Authority supports the notation for the	On the Key Diagram; the existing map notation for improved connectivity should be shown along Forest Road as there is a need	No	N/A

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							Regional Park on the Key Diagram, Fig 4. A minor amendment is suggested however to the Key Diagram; the existing map notation for improved connectivity should be shown along Forest Road as there is a need to enhance the environment and legibility of routes for pedestrians and cyclists along this major road. The proposed entrances to the Walthamstow Wetlands site should also be identified.	to enhance the environment and legibility of routes for pedestrians and cyclists along this major road. The proposed entrances to the Walthamstow Wetlands site should also be identified. This would assist in illustrating aspects of policy BHL12 Transport in particular A iv) and the Authority's Park Development Framework proposals under 3.R.1		
183754	Lee Valley Regional Park Authority (Mr Stephen Wilkinson)	bh1ps52	Policy BHL8: Design and Local Character	Not specified	Not specified	Not specified	Design and Local Character The Authority supports the recommendation originating from the Blackhorse Lane Urban Design Framework that building heights should be set at 3 to 6 storeys (Policy BHL8: Design and Local Character), rather than the 5 to 9 storeys advocated in the Core Strategy for the key growth areas (Policy CS15). The Station Hub and Waterfront key gateway site BHL1 is considered suitable for building heights towards the upper limit of this range i.e. 5-6 storeys. As this site is adjacent to the Park boundary there is already concern as to potential impact of tall structures in this	Not specified	Not specified	Not specified

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							area, their barrier effect and visual impact on the Park as well as potential negative impacts on the Walthamstow Wetlands SSSI, SPA and Ramsar sites. This was an issue during the two planning appeals on the site of the former Essex Wharf when the Authority successfully supported the Councils two planning appeals.			
183754	Lee Valley Regional Park Authority (Mr Stephen Wilkinson)	bhyps49	Policy BHL9: Open Space and Nature Conservation	Not specified	No	Effective	Please refer to the Park Authority's letter dated 26th April 2013 for details of the Authority's statutory remit and responsibilities. It is noted that under BHL9 E) the Council have de-designated the Gun Site Playing Field. Whilst the Authority accepts the reasons for this change an addition to the justification text should be made to clarify that the Gun Site remains within the Park.	Justification text para 3.6.17 explains that the playing field designation is misleading as through successive planning permissions most of the site now functions as either amenity space for the adjacent Gypsy and Traveller Site or as part of a Muslim burial ground. The site remains part of the green belt. The justification text should also state that the site forms part of the Regional Park and is therefore covered by proposals in the Authority's Park Plan and Park Development Framework (Adopted Proposals for Area 4.A.1).	Yes	Not specified
183754	Lee Valley	bhyps53	Policy BHL9:	Not	Not	Not	Public Open Space and Nature	Not specified	Not	Not

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
	Regional Park Authority (Mr Stephen Wilkinson)		Open Space and Nature Conservation	specified	specified	specified	<p>Conservation The changes that have been made to strengthen Policy BHL9 Open Space and Nature Conservation, as requested by the Authority, are supported. BHL9A iii) now ensures that only in exceptional circumstances will a development causing negative impacts on Lee Valley SPA, Ramsar and other sites of importance for nature conservation be considered and then only when appropriate mitigation for any harm has been provided and no adverse impacts on the integrity of the SPA/Ramsar would result. It is noted that this wording accords with that proposed in the conclusions of the HRA Scoping report. The addition of wording under Policy BHL9 A) iv) which encourages new developments to create green corridors along watercourses as part of measures to enhance biodiversity is supported as is the policy emphasis on existing open spaces to be both protected and enhanced (Policy BHL9 B). The Authority also supports the addition of a new subsection D) to Policy BHL9 which provides a positive policy about protecting ecology: Development proposals that help protect and enhance the ecological integrity of the Lee</p>		specified	specified

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							Valley Special Protection Area/Ramsar Site, in order to sustain the complex habitats and the levels of populations for which it was classified, will be supported			
183754	Lee Valley Regional Park Authority (Mr Stephen Wilkinson)	bh1ps50	Policy BHL10: Walthamstow Wetlands and Lee Valley Regional Park	Not specified	No	Effective	The Authority supports the redrafting of policy BHL10 for Walthamstow Wetlands so that this now includes policy for the Lee Valley Regional Park. The inclusion of extra detail for public access points into the Walthamstow Wetlands is also welcomed; this mirrors the detail presented in the Authority's Adopted PDF Area Proposals for 3.A.1 Walthamstow Wetlands. There is concern however that insufficient detail has been provided in the Justification text to support the policy and explain the statutory purpose of the Regional Park. Please refer to the Park Authority's letter dated 26th April 2013 for details of the Authority's statutory remit and responsibilities. The PDF Area proposals will also need to be incorporated as an Appendix to the AAP. Policy CS5 in the Councils Local Plan Core Strategy seeks to protect, promote and enhance the Regional Park as part of the Boroughs green infrastructure. Supporting text (paragraph 8.25) highlights the emerging AAPs for	The following wording is therefore proposed to address the Authority's concerns, to follow from paragraph 3.6.30: 3.6.30 A significant area of the Lee Valley Regional Park lies within the Blackhorse Lane area. The Regional Park is statutorily designated for leisure, recreation, sport, entertainment and nature conservation. Covering an area of 10,000 acres (4,000ha) it extends for 26 miles broadly following the River Lee from Ware in Hertfordshire down through Essex, and North London to the River Thames. The Park is defined by its openness, heritage rich landscape and world class facilities. This provides the context for a diverse range of habitats and a variety of	Yes	Not specified

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							<p>the Blackhorse Lane area and the Northern Olympic Fringe as the mechanism for taking forward any emerging proposals from the Park Development Framework.</p>	<p>leisure facilities that create a continuous inter-related open area for leisure and recreation extending to the Queen Elizabeth Olympic Park and the Thames to the south. The Lee Valley Regional Park offers access to nature, leisure and recreation for local residents and workers and can support the Council's Community Strategy targets focused on health and education. It can also greatly enhance the setting of new developments and improve the quality of life of the wider community. 3.6.31 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</p>		

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
								<p>nature conservation throughout the Park. 3.6.32 Section 14 (1) of the Park Act requires the Authority to prepare a plan setting out proposals for the future management and development of the Regional Park and riparian planning authorities such as Waltham Forest are required to include those parts of the plan affecting their area within their own relevant planning strategies and policies (Section 14(2) (a)) although inclusion does not infer that the planning authority necessarily agrees with them (Section 14 (2) (b)). Both the Park Plan 2000 and the Park Development Framework are relevant in terms of Section 14 (2) of the Park Act and are formal statements of the Authority's position in respect of development within the Regional Park. 3.6.33 Further, sections 14</p>		

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
								<p>(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. 3.6.34 The Council will support and work with the Regional Park Authority to deliver the Park Plan 2000 and the Park Development Framework, once adopted. The Council supports the overall aims of the Park Development Framework which seek to protect and enhance biodiversity, sporting and recreation</p>		

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
								<p>resources of the Regional Park. The emerging Area Action Plans for the Northern Olympic Fringe and Blackhorse Lane areas cover parts of the Lee Valley Regional Park within Waltham Forest. Accordingly, these planning documents provide the opportunity for taking forward the adopted and emerging proposals from the Park Development Framework. 3.6.35 The Regional Park Authority's Park Development Framework Adopted Proposals for the area of the Park that lies within Blackhorse Lane AAP are included in Schedule XX to the AAP. Full details of the Park Development Framework and Area Proposals can be found at www.leevalleypark.org.uk/parkframework/home/ The Area proposals as they relate to Blackhorse Lane AAP are attached as</p>		

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
								appendices to this form.		
183754	Lee Valley Regional Park Authority (Mr Stephen Wilkinson)	bh1ps54	Policy BHL10: Walthamstow Wetlands and Lee Valley Regional Park	Not specified	Not specified	Not specified	Lee Valley Regional Park Policy The Authority supports the redrafting of policy BHL10 for Walthamstow Wetlands so that this now includes policy for the Lee Valley Regional Park. The inclusion of extra detail for public access points into the Walthamstow Wetlands is also welcomed; this mirrors the detail presented in the Authority's adopted PDF Area Proposals for 3.A.1 Walthamstow Wetlands. There is concern however that insufficient detail has been provided in the Justification text to support the policy and explain the statutory purpose of the Regional Park. The PDF Area proposals will also need to be incorporated as an Appendix to the AAP. Policy CS5 in the Councils Local Plan Core Strategy seeks to protect, promote and enhance the Regional Park as part of the Boroughs green infrastructure. Supporting text (paragraph 8.25) highlights the emerging AAPs for the Blackhorse Lane area and the Northern Olympic Fringe as the mechanism for taking forward any emerging proposals from the Park Development Framework.	Not specified	Not specified	Not specified
183754	Lee Valley Regional Park	bh1ps55	Paragraph 5.1.1	Not specified	Not specified	Not specified	Implementation Given the likely nature and scale of residential and commercial development	Not specified	Not specified	Not specified

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
	Authority (Mr Stephen Wilkinson)						which will occur as a result of this AAP the Authority considers that a clear reference needs to be included to the successful negotiation of section 106 agreements and/or the proposed CIL charging schedule to secure benefits to the Regional Park. This will be necessary due to the increased visitors caused by these proposals. Moneys could be in the form of commuted payments to support the management of the sites such as Walthamstow Wetlands. The Authority wishes to be kept informed of the outcome of this consultation and any minor modifications made to the Proposed Submission document.			
760701	London Underground Ltd (Shahina Inayathusein)	bhlp8	Introduction	Not specified	Not specified	Not specified	We have no comments to make at this stage except that London Underground Infrastructure Protection need to be consulted as Statutory Consultees on any planning application within 50 metres of the railway. Where there are intended works in the Highway we would need to be notified of these so that we can ensure there is no damage to them.	Not specified	Not specified	Not specified
732145	Marine Management Organisation (Ms Angela Atkinson)	bhlp10	Introduction	Not specified	Not specified	Not specified	Thank you for inviting the Marine Management Organisation (MMO) to comment on the above consultation. I can confirm that the MMO has no comments on	Not specified	Not specified	Not specified

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							this document as the geographical area it covers does not include any area of the sea or tidal river and is therefore not within our remit.			
556058	Mr Sam Parry	bhlp3	Key diagram	Yes	Yes	Not specified	N/A	N/A	No	N/A
150911	National Grid (Agent: Mr Julian Austin, Amec)	bhlp18	Introduction	Not specified	Not specified	Not specified	National Grid has appointed AMEC to review and respond to development plan consultations on its behalf. We are instructed by our client to submit the following representation with regards to the current consultation on the above document. Overview National Grid National Grid is a leading international energy infrastructure business. In the UK National Grids business includes electricity and gas transmission networks and gas distribution networks as described below. Electricity Transmission National Grid, as the holder of a licence to transmit electricity under the Electricity Act 1989, has a statutory duty to develop and maintain an efficient, co-ordinated and economical transmission system of electricity and to facilitate competition in the supply and generation of electricity. National Grid operates the national electricity transmission network across Great Britain and owns and maintains the network in England and Wales, providing electricity	Not specified	Not specified	Not specified

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							<p>supplies from generating stations to local distribution companies. We do not distribute electricity to individual premises ourselves, but our role in the wholesale market is key to ensuring a reliable and quality supply to all. National Grids high voltage electricity system, which operates at 400,000 and 275,000 volts, is made up of approximately 22,000 pylons with an overhead line route length of 4,500 miles, 420 miles of underground cable and 337 substations. Separate regional companies own and operate the electricity distribution networks that comprise overhead lines and cables at 132,000 volts and below. It is the role of these local distribution companies to distribute electricity to homes and businesses. To facilitate competition in the supply and generation of electricity, National Grid must offer a connection to any proposed generator, major industry or distribution network operator who wishes to generate electricity or requires a high voltage electricity supply. Often proposals for new electricity projects involve transmission reinforcements remote from the generating site, such as new overhead lines or new development at substations. If</p>			

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							<p>there are significant demand increases across a local distribution electricity network area then the local network distribution operator may seek reinforcements at an existing substation or a new grid supply point. In addition National Grid may undertake development works at its existing substations to meet changing patterns of generation and supply. Gas Transmission National Grid owns and operates the high pressure gas transmission system in England, Scotland and Wales that consists of approximately 4,300 miles of pipelines and 26 compressor stations connecting to 8 distribution networks. National Grid has a duty to develop and maintain an efficient co-ordinated and economical transmission system for the conveyance of gas and respond to requests for new gas supplies in certain circumstances. New gas transmission infrastructure developments (pipelines and associated installations) are periodically required to meet increases in demand and changes in patterns of supply. Developments to our network are as a result of specific connection requests e.g. power stations, and requests for additional capacity</p>			

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							<p>on our network from gas shippers. Generally network developments to provide supplies to the local gas distribution network are as a result of overall demand growth in a region rather than site specific developments. Gas Distribution National Grid also owns and operates approximately 82,000 miles of lower-pressure distribution gas mains in the north west of England, the west Midlands, east of England and north London - almost half of Britain's gas distribution network, delivering gas to around 11 million homes, offices and factories. National Grid does not supply gas, but provides the networks through which it flows. Reinforcements and developments of our local distribution network generally are as a result of overall demand growth in a region rather than site specific developments. A competitive market operates for the connection of new developments. National Grid and Local Development Plan Documents The Energy White Paper makes clear that UK energy systems will undergo a significant change over the next 20 years. To meet the goals of the white paper it will be necessary to revise and update</p>			

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							<p>much of the UK's energy infrastructure during this period. There will be a requirement for: * an expansion of national infrastructure (e.g. overhead power lines, underground cables, extending substations, new gas pipelines and associated installations); and * new forms of infrastructure (e.g. smaller scale distributed generation, gas storage sites). Our gas and electricity infrastructure is sited across the country and many stakeholders and communities have an interest in our activities. We believe our long-term success is based on having a constructive and sustainable relationship with our stakeholders. Our transmission pipelines and overhead lines were originally routed in consultation with local planning authorities and designed to avoid major development areas but since installation much development may have taken place near our routes. We therefore wish to be involved in the preparation, alteration and review of Development Plan Documents (DPDs) which may affect our assets including policies and plans relating to the following issues: * any policies relating to overhead transmission lines, underground cables or gas</p>			

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							<p>pipeline installations; * site specific allocations/land use policies affecting sites crossed by overhead lines, underground cables or gas transmission pipelines; * land use policies/development proposed adjacent to existing high voltage electricity substation sites and gas above ground installations; * any policies relating to the diverting or undergrounding of overhead transmission lines; * other policies relating to infrastructure or utility provision; * policies relating to development in the countryside; * landscape policies; and * waste and mineral plans. In addition, we also want to be consulted by developers and local authorities on planning applications, which may affect our assets and are happy to provide pre-application advice. Our aim in this is to ensure that the safe and secure transportation of electricity and gas is not compromised. National Grid infrastructure within Waltham Forest Councils administrative area Electricity Transmission National Grids high voltage electricity overhead transmission lines / underground cables within Waltham Forest Councils administrative area that form an essential part of the electricity transmission network in</p>			

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							<p>England and Wales include the following: * ZBH line “ 275kV route / underground cable from Redbridge substation in Redbridge to Tottenham substation in Haringey * VC line “ 275kV route from Hackney substation in Hackney to Tottenham substation in Haringey * YYJ line “ 400kV route from Hackney substation in Hackney to West Ham substation in Newham National Grid has provided information in relation to electricity transmission assets, including maps and GIS shape files showing their broad locations, via the following internet link: http://www.nationalgrid.com/uk/LandandDevelopment/DDC/GasElectricNW Gas Transmission National Grid has no gas transmission assets located within the administrative area of Waltham Forest Council. Gas Distribution National Grid Gas Distribution owns and operates the local gas distribution network in the Waltham Forest Council area. If you require site specific advice relating to our local gas distribution network then information should be sought from: National Grid Plant Protection National Grid, Block 1, Floor 2 Brick Kiln Street Hinckley LE10 0NA</p>			

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							<p>plantprotection@uk.ngrid.com Specific Comments The following National Grids high voltage overhead transmission line runs approximately 20 metres to the west of the site BH11 ~Old Coppermill: * VC line " 275kV route from Hackney substation in Hackney to Tottenham substation in Haringey Whilst it is noted that the proposed allocation involves internal conversion for community facilities only, due to the proximity of the building to the overhead powerline, National Grid would like the following comments to be taken into consideration. National Grid does not own the 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</p>			

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							<p>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 Grids 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</p>			

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							<p>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: www.nationalgrid.com/uk/senseofplace Further information regarding development near overhead lines and substations is available here:</p>			

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							<p>http://www.nationalgrid.com/uk/LandandDevelopment/DDC/devnearohl_final/pdf/brochure.htm Further Advice National Grid is happy to provide advice and guidance to the Council concerning our networks. If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us. In addition the following publications are available from the National Grid website or by contacting us at the address overleaf: * National Grids commitments when undertaking works in the UK - our stakeholder, community and amenity policy; * specification for Safe Working in the Vicinity of National Grid High Pressure Gas Pipelines and Associated Installations - Requirements for Third Parties; and * A sense of place - design guidelines for development near high voltage overhead lines. Please remember to consult National Grid on any Development Plan Document (DPD) or site-specific proposals that could affect our infrastructure.</p>			
336234	Natural England (Ms Kate Wheeler)	bhlps12	Introduction	Not specified	Not specified	Not specified	Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is	Not specified	Not specified	Not specified

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. Natural England has no comment to make on the submission version of the Area Action Plan or its soundness.			
151002	Thames Water (Agent: Mr Phil Jameson, Savills)	bh1ps5	Policy BHL10: Walthamstow Wetlands and Lee Valley Regional Park	Yes	Yes	Not specified	Thank you for the opportunity for Thames Water Utilities Ltd. (Thames Water) to comment on the above. Thames Waters Property Services function is now being delivered by Savills (UK) Limited as Thames Waters appointed supplier. Savills are therefore pleased to respond to the above consultation on behalf of Thames Water. TWUL is the statutory water and sewerage for London Borough of Waltham Forest. Under the Water Industry Act, Thames Water has a duty to ensure that its area is effectively drained and to effectively deal with the contents of its sewers. That duty is mindful of available resources and requires the assistance of local planning authorities in ensuring that those resources are not overwhelmed in complying with those duties. 3.6 Public Open Space and Nature Conservation The Blackhorse Lane Area Action Plan covers a number of Thames Waters key	N/A	No	N/A

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							<p>operational sites that are used in connection with the supply of water to London Borough of Waltham Forest and the surrounding area, including: - Banbury Reservoir - Coppermills Water Treatment Works - Lockwood Reservoir - High Maynard Reservoir - Low Maynard Reservoir - Warwick Reservoir East - Warwick Reservoir West - Forest Road Borehole & Reservoirs Paragraph 3.6.2 For accuracy it is recommended that the first sentence of paragraph 3.6.2 reads as follows: Walthamstow Reservoirs, part of the Walthamstow Wetlands project are an exceptional and extensive blue/green asset adjoining the Blackhorse Lane area. The recognition that Walthamstow Wetlands are an exceptional asset of value in terms of nature conservation and biodiversity is supported. The recognition that the potential for Walthamstow Wetlands to offer access to nature, leisure and recreation, should be balanced against the Wetlands nature conservation and biodiversity value is also supported. The potential for such gains will also need to be balanced against the functional and operational aspects of the</p>			

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							<p>Thames Water reservoirs. Figure 10: Existing levels of Access to Open Space It is noted that part of Coppermills Water Treatment Works (WTW) is identified in Figure 8 as an Unrestricted Access Open Space Deficiency Area . Whilst the objective of increasing access to Thames Waters operational reservoir sites elsewhere within the AAP area is supported, it should be noted that opportunities for increasing access to Thames Waters 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. Policy BHL9: 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. Paragraph 3.6.8 The inclusion of paragraph</p>			

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							3.6.8 is supported. This paragraph recognises the functional / operational aspects that Walthamstow Reservoirs provide for Thames Water and that these aspects need to be considered when introducing public access. It will be essential that introducing public access does not impact on the sites primary function as water supply reservoirs. Paragraph 3.6.21 It is considered that paragraph 3.6.21 should also recognise the functional and operational aspects of Walthamstow Reservoirs. It is therefore recommended that the first sentence of this paragraph should read as follows: 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.			
151002	Thames Water (Agent: Mr Phil Jameson, Savills)	bhlps6	Policy BHL11: Flood Risk	Yes	Yes	Not specified	Thank you for the opportunity for Thames Water Utilities Ltd. (Thames Water) to comment on the above. Thames Waters Property Services function is now being delivered by Savills (UK) Limited as Thames Waters appointed supplier. Savills are	N/A	No	N/A

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							<p>therefore pleased to respond to the above consultation on behalf of Thames Water. TWUL is the statutory water and sewerage for London Borough of Waltham Forest. Under the Water Industry Act, Thames Water has a duty to ensure that its area is effectively drained and to effectively deal with the contents of its sewers. That duty is mindful of available resources and requires the assistance of local planning authorities in ensuring that those resources are not overwhelmed in complying with those duties. 3.7 Flood Risk Policy BHL11: 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 and as such may be appropriate within Flood Zones 2 or 3. Thames Water therefore supports the inclusion of bullet point E within Policy BHL11: Flood Risk. Sustainable Urban Drainage Systems (SUDS). The use of SUDS is supported, however it should be noted that where SUDS are not well</p>			

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							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.			
151002	Thames Water (Agent: Mr Phil Jameson, Savills)	bh1ps7	Paragraph 4.1.1	Yes	Yes	Not specified	Thank you for the opportunity for Thames Water Utilities Ltd. (Thames Water) to comment on the above. Thames Waters Property Services function is now being delivered by Savills (UK) Limited as Thames Waters appointed supplier. Savills are therefore pleased to respond to the above consultation on behalf of Thames Water. TWUL is the statutory water and sewerage for London Borough of Waltham Forest. Under the Water Industry Act, Thames Water has a duty to ensure that its area is effectively drained and to effectively deal with the contents of its sewers. That duty is mindful of available resources and requires the assistance of local planning authorities in ensuring that those resources are not overwhelmed in complying with those duties. 4 Opportunity Sites In respect of the Opportunity Sites identified within the AAP it should be noted that development of these sites may need to be supported by additional utilities infrastructure,	N/A	No	N/A

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							<p>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 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</p>			

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							<p>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. Planning Applications. Thames Water would expect to be consulted on most major planning applications. 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</p>			

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							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).			
761267	Transport for London (Mr Andrew Maunder)	bh1ps39	Introduction	Not specified	Not specified	Not specified	Conclusion While the ttL Property team continue to support the draft Blackhorse Lane Area Action Plan in principle, it considers Policies BHL4 and BHL8, and therefore the plan as a whole in its current form, to be unsound. I would be grateful for your acknowledgement of receipt of this representation and if you could keep me informed of the next steps in the development of this plan.	Not specified	Yes	As a major landowner fundamental to the delivery of the vision set out in the Area Action Plan, Transport for

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
										London which to be represented at the examination
761267	Transport for London (Mr Andrew Maunder)	bh1ps37	Introduction	Not specified	Not specified	Not specified	On behalf of the Transport for London (TfL) Property Department, I hereby respond to the consultation on the draft Blackhorse Lane Area Action Plan Proposed Submission (March 2013). The following comments represent the views of officers in Transport for London (TfL) Property Team in its capacity as a significant landowner only and does not form part of the TfL corporate response. This Representation should not be registered as the TfL response as London's transport provider, a response on TfL wide operational and land use planning / transport issues will be provided separately from Borough Planning as part of the GLA response. Background TfL have considerable land interests within the area covered by the draft Blackhorse Lane Area Action Plan (BHL AAP), including the land currently occupied by Blackhorse Road Underground Station, associated operational land and car park (as shown in	Not specified	Yes	As a major landowner fundamental to the delivery of the London which to be represented at the examination.

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							the enclosed plan), which form part of sites BHL1 and BHL2 as shown in the draft AAP. In September 2011, TfL Property submitted representations to the Preferred Options consultation of the AAP and associated Urban Design Framework (enclosed for ease of reference). The comments were strongly supportive of the need for an AAP for the area and the aims and objectives therein. In particular, the proposed range and mix of land uses proposed were supported (Question 15). However, TfL objected to the proposed restriction on building heights to 6 storeys in this location (Question 7). Having reviewed both the Public Consultation Report (March 2013) and Proposed Submission Draft of the AAP (March 2013), the TfL Property Team remains supportive in principle of the proposed policy, but objects to aspects of draft policies BHL4 and BHL8, and therefore considers the plan to be unsound.			
761267	Transport for London (Mr Andrew Maunder)	bhlps36	Policy BHL4: Household Sizes	Not specified	No	Justified; Consistent with national policy	Objection to Policy BHL4 In commenting on the previous draft of the AAP, TfL Property indicated a strong support for the creation of a new, sustainable neighbourhood of higher density developments in the area around	Rephrase policy point A to read "A) Site BHL 1 (Station Hub and Waterfront) and Site BHL2 North (Car Wash Site); a higher proportion of one and	Yes	As a major landowner fundamental to the

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							<p>Blackhorse Road Station, and sites BHL1 and BHL2 in particular, due its excellent public transport provision and potential to deliver lasting regeneration in the area. However, in previous drafts of the AAP, no mention had been made of a proscriptive requirement for a minimum proportion of large family-sized units. We are surprised, therefore at the inclusion of the following passage in draft policy BHL4: In the interests of securing a high quality scheme at these landmark locations, at least 30% of dwellings this site must have 3 or 4 bedrooms. TfL strongly objects to this late addition to the policy for two reasons. First, the land take of dwellings of this size would be very onerous and jeopardise the viability of any mixed use scheme in this location, contrary to the requirement of the National Planning Policy Framework (NPPF). Second, we consider the Council to have failed in following the correct procedure in the consultation process. The National Planning Policy Framework The NPPF places much emphasis on viability and the need to ensure that both plans and planning decisions do not render development unviable.</p>	<p>two bedroom properties will be acceptable; provided that proposals offer generous room sizes and amenity space.</p>		<p>delivery of the vision set out in the Area Action Plan, Transport for London which to be represented at the examination.</p>

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							<p>Paragraph 159 (Housing) outlines the Local Authority's requirement to: prepare a Strategic Housing Land Availability Assessment to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period (our emphasis). Additionally, paragraph 173 (Ensuring viability and deliverability) states the following: Pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking. Plans should be deliverable. Therefore, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable</p>			

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							<p>There is no evidence in the submission documents, previous consultation drafts, supporting documents or evidence base that the viability of the requirement to deliver 30% of dwellings as three or four bedroom has been considered or adequately assessed and found to be viable in this location. TfL Property believes that the requirement is too onerous, and that the land take required to deliver this scale of family-sized units, associated amenity space and infrastructure is too high and would render the redevelopment of sites BHL1 and 2 unviable, contrary to the aims, objectives and requirements of the NPPF. The matter is compounded by the conservative building heights proscribed by draft Policy BHL8 as discussed below. Consultation Additionally, TfL holds that the Council has not followed proper procedure by introducing a fresh (and onerous) requirement at the submission stage without having previously consulted on or even mentioned such a requirement. Neither at the Issues and Options stage, nor at the Preferred Options stage was a specific target figure for the provision of family-sized units suggested or consulted on. The Public Consultation Report</p>			

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							published in March 2013 for the Preferred Options AAP document demonstrates that none of the representations made or Council Officers responses to the representations suggested that a target figure of 30% (or otherwise) for family-sized dwelling units be introduced into the policy wording. A detailed review of the report shows a very broad consensus in the support for the flexibility written into previous consultation drafts in relation to unit mix. Subsequently, the Proposed Submission AAP was approved by the Council Cabinet on 15 January 2013, with no mention, neither in the officers report nor the meeting minutes, of a proposed change in policy. It is evident, therefore, that 30% family dwelling requirement has been introduced late in the plan-making process and without proper procedure or adequate consultation, and cannot, therefore, be considered robust. For the reasons above, draft Policy BHL4 is unsound.			
761267	Transport for London (Mr Andrew Maunder)	bhlps38	Policy BHL8: Design and Local Character	Not specified	No	Justified; Consistent with national policy	Objection to Policy BHL8 In our previous representation to the Preferred Option stage of the AAP, TfL property objected to the proposed restriction of building heights for sites BHL1 and BHL2 proposed in Question 7 to six	Part D of the policy should be deleted and reworded, so it is consistent with Core Strategy Policy CS15:'D) ensure that tall buildings (defined	Yes	As a major landowner fundamental to the

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							<p>storeys. The Submission Draft incorporates this restriction into Policy BHL8 D) (Design and Local Character) by stating that new development in Blackhorse Lane should: ensure appropriate building height of between 3-6 storeys that respect the existing built context and adjacent landscape features. Development proposals including building height towards the upper limit of this range (i.e. 5-6 storeys) should be directed to the key gateway site of BHL1: the Station Hub and Waterfront, and subject to an exemplary standard of design. Paragraph 3.5.13 acknowledges Policy CS15 of the Core Strategy (Well Designed Buildings, Places and Spaces, adopted March 2012), which sets out the following: Subject to detailed analysis of their impact on local and historic context and other key criteria [...] tall buildings (defined as ten storeys and above (26 metres above natural ground level)) may only be appropriate on specific sites within the key growth areas of Blackhorse Lane [...]. In some limited circumstances, medium rise, taller buildings (defined as between 5-9 storeys (13 - 23 Metres above natural ground level)) may be appropriate both within the growth</p>	<p>as ten storeys and above (26 metres above natural ground level) and medium rise, taller buildings (defined as between 5-9 storeys (13 - 23 Metres above natural ground level) are located in key gateway locations and are subject to an exemplary standard of design".</p>		<p>delivery of the vision set out in the Area Action Plan, Transport for London which to be represented at the examination.</p>

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							<p>areas and at other key locations [...]. However, the policy justification subsequently negates the applicability of this policy to the area on the basis of the prevailing surrounding local character. The latter is described as having somewhat low / medium densities and inefficient use of land (para. 3.5.12) and being devoid of Conservation Areas or statutorily listed buildings (para. 3.5.11). The AAP is correct to seek the highest standards of design for any new development in the area, but by imposing such conservative building height restrictions risks negating the significant benefits that a truly high quality and high density redevelopment of sites BHL 1 and BHL2 that makes the very best and efficient use of the land in this highly sustainable location could bring to an area in need of regeneration and improvement. Therefore, the draft policy not only contradicts the aims, objectives and policies of the Council's own adopted Core Strategy, but risks undermining the deliverability of schemes to the area and restricting their full potential. For the reasons above, Policy BHL8 is also unsound.</p>			
183298	Workspace Group PLC	bhpls47	Introduction	Yes	No	Consistent with	We look forward to confirmation of receipt of these	Not specified	Yes	To explain

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
	(Agent: Mr Tudor Jones, GVA)					national policy	representations at the earliest opportunity and would welcome the opportunity to meet with officers to discuss any part of our representations as required. We also reserve the right to request to be heard by the appointed examiner at the public examination when details of this are finalised.			and expand on our position
183298	Workspace Group PLC (Agent: Mr Tudor Jones, GVA)	bh1ps40	Introduction	Not specified	No	Consistent with national policy	Thank you for consulting us on the Councils Blackhorse Lane Area Action Plan (AAP). We respond on behalf of our client, Workspace Group Plc, owners of the Uplands Business Park. Workspace is a leading provider of affordable managed business accommodation for small and medium sized enterprises. Uplands Business Park is located off Blackhorse Lane and primarily comprises light-industrial / warehouse units, ranging in size from 100 to 15,000 sq ft. Our client has previously commented on the Blackhorse Lane AAP Preferred Options Document (consultation 22/08/11 to 30/09/11). In general, we support the principle of adopting an Area Action Plan for Blackhorse Lane to add clarity to development objectives in this area of Waltham Forest. We consider the document to be legally compliant. However, having reviewed the	Not specified	Yes	To explain and expand on our position

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							document, as currently drafted we consider that it is not sound. We provide the following comments and suggested amendments which we consider necessary to ensure the soundness of the document, particularly in seeking to provide consistency with national policy, namely the delivery of sustainable development and growth. In addition, you will find attached a completed response form that accompanies the following representations.			
183298	Workspace Group PLC (Agent: Mr Tudor Jones, GVA)	bhlps41	Policy BHL3: Housing Densities	Yes	No	Consistent with national policy	<p>Commentary We support the Councils recognition that the area surrounding Blackhorse Road Station can deliver higher density residential development. We do not agree, however, that this is the only area where higher density residential development should be concentrated. Development on sites is to be optimised and where no environmental, infrastructure or townscape harm arises, higher densities should not be resisted if best use is to be made of scarce urban brownfield land. It should therefore be for analysis of these key factors to determine the scale of buildings that might arrive on any particular site on a scheme specific basis. Policy 3.4 of the London Plan relates to optimising</p>	<p>Recommendation On the basis of the above, we suggest the following re-wording: Higher density residential development should be concentrated on sites surrounding Blackhorse Road Station, and other sites where considered appropriate. Key considerations will be: A) the existing PTAL covering the site; B) any planned improvements in provision of shops, services and public transport in the locality; C) the need to provide a high quality design;</p>	Yes	To explain and expand on our position

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							housing potential. The policy provides a housing density matrix (Table 3.2) as a guide to housing density at different types of locations LBWFs emerging Development Management Policies document seeks to optimise housing densities in accordance with London Plan density matrix (Table 3.2). In the supporting text on the London Plan Policy 3.4 (para 3.28) it is noted that it is not appropriate to apply Table 3.2 mechanically. Its density ranges for particular types of location are broad, enabling account to be taken of other factors relevant to optimising potential “ local context, design and transport capacity are particularly important, as well as social infrastructure, open space and play. Where appropriate, these broad density ranges can provide a tool for increasing density in situations where transport proposals will improve public transport accessibility in the future. As with the density guidelines set out in the London Plan, density set out in the AAP should be applied flexibly and with regard to the site specific circumstances	including generous room sizes, storage space and communal gardens where appropriate. As a minimum, the standards set out in Development Management Policies DM7 (Amenity and Internal Space) and DM8 (Housing Quality and Accessibility) should be met.		
183298	Workspace Group PLC	bh1ps42	Policy BHL5: Affordable	Yes	No	Consistent with	Commentary We note that Policy BHL 5 states new developments	Recommendation On the basis of the above	Yes	To explain

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
	(Agent: Mr Tudor Jones, GVA)		Housing			national policy	should provide affordable housing in accordance with the requirements of Core Strategy Policy CS2 (Improving Housing Quality and Choice), and Development Management Policy DM3 (Affordable Housing Provision). Core Strategy Policy CS2 - Improving Housing Quality and Choice, and Development Management Development Policy DM3 (Affordable Housing Provision), set out the Boroughs overarching policy position on affordable housing. Core Strategy Policy CS2 makes clear that to enable the delivery of the maximum amount of affordable housing through development, assessing the level of affordable housing should be assessed on a site by site basis and should be subject to viability. This approach is in accordance with both national and regional policy. Paragraph 160 states that local planning authorities should work closely with the business community to understand their changing needs and identify and address barriers to investment, including viability. Paragraph 173 states: the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens	we suggest the following re-wording: Financial contributions to off site affordable housing will be accepted in exceptional circumstances, where it can be demonstrated that it is not practical or viable to provide affordable housing on site.		and expand on our position

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							<p>that their ability to be developed viably is threatened. To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable. Policy 3.12 of the London Plan states the maximum reasonable amount of affordable housing should be sought when negotiating on individual private residential and mixed use schemes. Noting that, negotiations on sites should take account of their individual circumstances including development viability. We consider that viability consideration for the provision of affordable housing is a key factor in the determination of planning applications to ensure that they are assessed in a manner which encourages delivery. Notwithstanding this, we consider that repeating the strategy on affordable housing that is already set out at national, regional and</p>			

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							local level is not necessary in the AAP and appears contrary to the Government's stated intention to streamline the planning system and reduce the overall amount of planning policy guidance. We also note that Policy BHL 5 states that financial contributions to off-site affordable housing will only be accepted in exceptional circumstances, where it is not practical to provide affordable housing on site. Whilst we support the clarification of financial payment in lieu mechanisms in the Blackhorse Lane AAP, we consider that in order to achieve viable schemes with the maximum reasonable amount of affordable housing, greater flexibility should be added to the wording of this policy.			
183298	Workspace Group PLC (Agent: Mr Tudor Jones, GVA)	bh1ps43	Policy BHL6: Employment	Yes	No	Consistent with national policy	Commentary Workspace has previously commented on the Blackhorse Lane AAP Preferred Options Consultation (22/08/11 to 30/09/11). In particular, our client made a number of comments in relation to employment policy BHL 6. We note that these comments have not led to the significant change to the drafting of the AAP. Notwithstanding this, our client maintains their position in relation to the proposed employment policy for the AAP area. We therefore provide the	Recommendation On the basis of the above, we suggest the following re-wording: A) providing new high quality B1 floorspace for a range of small/medium businesses and creative industries as part of mixed use developments in the sites identified in Section 4: Opportunity Sites and other existing employment sites that	Yes	To explain and expand on our position

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							<p>following comments on their behalf. We note part (A) of Policy BHL 6 which seeks to provide new high quality B1 floorspace for small/ medium businesses and creative industries as part of mixed use developments in the sites identified in Section 4: Opportunity Sites. Workspace has experienced changes in the types of business activities and the demand for floorspace from the occupants of its property portfolio and there has been a noticeable shift away from the requirement for traditional Class B floorspace. Our client therefore supports the move towards promoting more intensive types of employment uses including providing space for creative industries and small and medium enterprises. However, we consider 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</p>	<p>are no longer economically viable and demonstrated as being surplus to the Boroughs employment needs. Where provided, new floorspace should; - offer a flexible floor plate including minimal supporting columns, generous floor to ceiling heights, wide doors and corridors, and a suitable floor loading capacity - provide suitable access, servicing and parking for commercial vehicles - be of a sufficient scale to ensure the continued employment function of the area is not undermined; giving due consideration to the indicative targets for new employment floorspace set out in section 5.3 of this document. B) 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>		

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							<p>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 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. Without the incorporation of a higher value mixed-use, the existing under-used and vacant sites may become sterilised and potential regeneration benefits lost. We object to part (B) of Policy BHL 6 which seeks to direct general industrial (including green industries), storage, manufacturing and distribution uses to land designated as SIL, as it is no longer compliant with national planning policy and does not accord with the Council's Local Economic Assessment 2010. Paragraph 14 of the National Planning Policy Framework states At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development . A key role of the government's definition of sustainable development as set in paragraph 7 is an economic role</p>	<p>development where this secures employment generating development, accommodation for small and medium sized enterprises and the diversification and growth of the local economy. C) requiring redevelopment of any other existing employment land, with the exception of sites where preferred land uses have already been identified, for non employment or training purposes to demonstrate that the existing space is no longer fit for purpose, and has no reasonable prospect of coming forward for future employment use. Evidence should be provided that: - the site has been appropriately advertised at a price in line with local market values, with terms and conditions that are reasonable and attractive to potential business - all opportunities to re-let</p>		

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							<p>contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation. Paragraph 22 of the National Planning Policy framework also states: Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities. The Waltham Forest Local Economic Assessment (2010) highlights the change in economic conditions. Section 5.2 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</p>	<p>for employment generating uses have been adequately explored, including where this requires flexibility in terms of sub-dividing existing floorspace. Where it is accepted that existing business space is no longer fit for purpose, redevelopment should incorporate new fit for purpose B1 space in accordance with the requirements of policy point A to ensure the development brings an uplift in levels of employment on site. Where this is not possible, justification on viability grounds will be required. D) supporting the refurbishment of existing industrial buildings of architectural merit where viable; to provide new employment space with high environmental standards for small and medium businesses; E) supporting uses that offer education and training opportunities for local residents</p>		

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							<p>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. There has been a long and well-established trend of decline in the demand for industrial accommodation throughout London. Based on local economic data this trend looks set to continue in Waltham Forest. We consider that the protection of existing employment sites for such uses in Waltham Forest will not reverse the ongoing industrial decline. The Councils Local Plan, including the AAP will guide new developments over a 15-20 year period. This policy will establish the land use principles for the area over the life of the Local Plan. During this period, the London Plan, including the SIL designations, will come under review. Given the current employment trends in London, it is considered likely that</p>	<p>within new, mixed use developments, and where appropriate within land designated as SIL; F) securing employment and/ or training of local people within new developments and during their construction; through local labour agreements, jobs brokerage initiatives, or financial contributions towards wider employment and training initiatives.</p>		

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							<p>area guidance, including SIL designations, may well change in this time, especially if the trend of industrial employment decline continues across London. As such this AAP policy needs to incorporate greater flexibility to respond to such changes. In accordance with national planning policy guidance, local economic evidence, and potential changes at a regional level 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. We note part (C) of the policy also requires the redevelopment of any other existing employment land for non employment or training purposes to demonstrate that the existing space is no longer fit for purpose, and has no reasonable prospect of coming forward for future employment use. However, clarification should be provided that the proposed criteria based assessment is not applicable to sites where preferred land uses have already been identified. Without the change, this policy could restrict residential development from coming forward in key areas which have been</p>			

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							identified for new housing. Similarly part (E) which allows education and training opportunities for local residents within new, mixed use developments, outside of land designated as SIL is acknowledged. However, we consider 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. It is important that training facilities are provided close to major sources of employment to synergy between business and education. Education and training uses should therefore not be restricted and consequently should be encouraged on designated strategic industrial locations.			
183298	Workspace Group PLC (Agent: Mr Tudor Jones, GVA)	bhlps44	Policy BHL7: Neighbourhood Centre and Local Retail	Yes	No	Consistent with national policy	Commentary In order to create a new neighbourhood centre for Blackhorse Lane, we support the Councils approach to focus new A1-A4 and D1-D2 to the area	Recommendation On the basis of the above, we suggest the following addition to planning policy: C)	Yes	To explain and expand on our

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
			Parades				surrounding Blackhorse Road Station. However, as well as encouraging the development of new town centre uses within the Boroughs designated centre, Policy BHL 7 should acknowledge that opportunity exists within the wider Blackhorse Lane area to introduce new retail and support services (such as a local convenience store) to serve the everyday needs of a growing population. To create mixed and sustainable communities with a sense of place and activity it is important to reduce the need to travel and provide the supporting infrastructure that they require to create a dynamic interactive community. As such, new forms of retail should be able to be located outside of identified centres where appropriate.	Outside of the neighbourhood centre and local retail parades at Higham Hill and Billet Road, individual convenience retail units as part of mixed use developments are acceptable, provided that they do not prejudice the success of the neighbourhood centre. Proposals located outside of these designated centres / local parades should demonstrate compliance with the sequential test approach and proposals should also be supported by a retail impact assessment.		position
183298	Workspace Group PLC (Agent: Mr Tudor Jones, GVA)	bh1ps45	Policy BHL8: Design and Local Character	Yes	No	Consistent with national policy	Commentary Our client supports the Council's aspiration that new developments in Blackhorse Lane should ensure the highest standard of urban and architectural quality which responds positively to local character and context. Workspace do not support the statement at part (d) of Policy BHL 8 that building heights should respect the existing built context and adjacent landscape features, and suggest instead	Recommendation On the basis of the above, we suggest the following re-wording: D) ensure appropriate building heights have regard to the existing built context and adjacent landscape features. Development proposals for taller buildings should be directed to the key gateway site of BHL 1:	Yes	To explain and expand on our position

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							<p>words to the effect that new buildings should have regard to the scale and context of existing building heights. This wording will avoid artificially stifling architectural innovation in terms of contextual response particularly where there is potential for significant townscape change. The use of a range for building heights can often be useful to help guide developers to understand what heights are likely to be appropriate in certain areas. However, we consider that the heights of new buildings should not be pre-determined by rigid policy and should be instead considered on a site by site basis, taking into account the relevant townscape, views and amenity factors. This approach will provide sufficient flexibility and allows for future changes in townscape circumstances, in an area which has been identified for significant growth. Whilst we acknowledge that taller buildings should be directed to the key gateway sites of BHL 1: The Station Hub and Waterfront, they should also be acceptable in other suitable locations. In addition we consider that an upper limit should not be set, but should be subject to the design quality of emerging proposals and their relationship</p>	<p>The Station Hub and Waterfront and other landmark locations, and subject to an exemplary standard of design.</p>		

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							with the wider urban context of the area. As such we suggest removing the height range from the policy wording.			
183298	Workspace Group PLC (Agent: Mr Tudor Jones, GVA)	bhpls46	Discounted sites	Yes	No	Consistent with national policy	We note that in section 4.15 of the Blackhorse Lane AAP Proposed Submission document, the Site at Uplands Business Park has been discounted on the basis that it is designated within the SIL in the London Plan. As previously raised in response to the Blackhorse Lane AAP Preferred Options (22/08/11 to 30/09/11 consultation) consultation, our client objects to the Council's decision to discount Uplands Business Park as an Opportunity Site for mixed-use regeneration. This decision does not reflect the condition of the site, the economics of the area or the overarching objectives of the National Planning Policy Framework. As a result there is a danger that this site will become sterilised and hinder economic development progress in this area. We note that as part of the London Plan SIL review process parts of the designation have been removed, notably Site BHL 1 Station Hub and Waterfront. Based on Uplands Business Parks locality and its similar site characteristics, it is possible that the site could be part of future	Not specified	Yes	To explain and expand on our position

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							<p>strategic release of SIL land as part of the next review of the London Plan. As such, we maintain that this site be removed from its Strategic Industrial Location (SIL) designation and should instead be allocated as an opportunity site that could deliver significant employment growth for small and medium sized enterprises and additional housing. It is recognised that the London Plan review and not the AAP is the appropriate means by which to seek amendments to the Mayors SIL designation. Notwithstanding this, we consider that the AAP can assist this process of de-designation by identifying the opportunity that exists for the site to be identified for mixed use development. We set out our clients position in further detail below. Site Character Uplands Business Park extends to approximately 4.7ha. 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. The existing buildings have become unsuitable for</p>			

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							<p>continued use as a business centre. 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.</p> <p>Local Economic Conditions The Council's Local Economic Assessment (2010) employment forecasts state that there will be long-term declines in manufacturing, 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 continued designation of Uplands Business Park within the SIL rather than in an opportunity area</p>			

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							<p>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. 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 National Planning Policy framework which states: * The Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth. Planning should operate to encourage and not act as an impediment to sustainable growth (NPPF, para 19) * The need to build a strong, responsive and competitive economy, by ensuring that</p>			

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							<p>sufficient land of the right type is available in the right places and at the right time to support growth and innovation (NPPF, para 7) Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities. (NPPF, para 22) Our client considers it is important to maximise the use of redundant and underused land in this area and also increase potential residential capacity. We consider 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</p>			

Blackhorse Lane Area Action Plan Consultation Report – Part II

Respondent ID	Respondent	Representation ID	Consultation Point	Legal compliance	Soundness	Unsound because it is not:	Reasons for Compliance and soundness	Changes necessary for legal compliance/soundness	Oral examination	Reasons for oral examination
							land may become sterilised and potential regeneration benefits lost. 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 along side residential units. 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. Uplands Business Park therefore provides an opportunity to be promoted for mixed-use development to increase the economic output and employment opportunities at this site.			