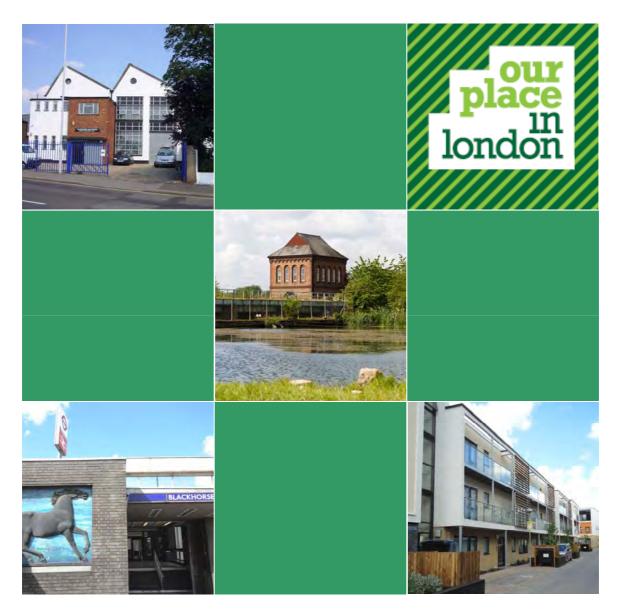
Waltham Forest Local Plan Supporting Document



Blackhorse Lane Area Action Plan

Summary of Main Issues Regulation 22(1)(c)(v)



February 2014

INTERPRETING AND TRANSLATION ASSISTANCE

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Albanian 🗖	Gujarati 🗖
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Arabic 🗖	Hindi 🗖
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Bengali 🗖	Punjabi 🗖
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French	Urdu 🗖
Name Address	CONTACT: Planning Policy Team Environment and Regeneration London Borough of Waltham Forest Sycamore House, Waltham Forest Town Hall Forest Road, Walthamstow, London, E17 4JF
Telephone No	Telephone 020 8496 3000 Email: <u>planning.policy@walthamforest.gov.uk</u> Web site: www.walthamforest.gov.uk

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Blackhorse Lane Area Proposed Submission

1	About this Document		1
2	Introduction		1
	2.1	What will the Area Action Plan do?	1
	2.2	Context	2
	2.3	Key issues	2
3	Visio	n and Objectives	2
	3.1	Vision	2
	3.2	Objectives	2
4	Key Policy Areas		3
	4.1	Introduction	3
	4.2	Housing	3
	4.3	Employment	4
	4.4	Neighbourhood Centre and Local Retail Parades	4
	4.5	Design and Local Character	5
	4.6	Public Open Space and Nature Conservation	5
	4.7	Flood Risk	6
	4.8	Transport	6
	4.9	Climate Change and Decentralised Energy	6
	4.10	Social Infrastructure	7
5	Орро	ortunity Sites	7
	5.1	Introduction	7
	5.2	Site BHL1 - Station Hub and Waterfront	7
	5.3	Site BHL2 North - Car Wash & Garage Site	8
	5.4	Site BHL2 South - Blackhorse Road/ Hawarden Road	8

Blackhorse Lane AAP Reg 22(1)(c)(v) - Summary of Main Issues

	5.5	5 Site BHL3 - Willowfield School, Tavistock Avenue	
	5.6	.6 Site BHL4 North - Sutherland Road	
	5.7	5.7 Site BHL4 South - Sutherland Road	
	5.8	.8 Site BHL5 - Papermill Place	
	5.9 Site BHL6 - Webb's Industrial Estate		9
	5.10	Site BHL7 - Billet Works	9
	5.11	Site BHL8 - 152/154 Blackhorse Road	9
	5.12	Site BHL9 - Former Essex Arms Public House	10
	5.13	Site BHL10 - Marine Engine House	10
	5.14	Site BHL11 - Old Coppermill	10
	5.15	Discounted sites	10
6	Implementation 1		
	6.1	Introduction	11
	6.2	Infrastructure Plan	11
	6.3	Indicative Development Targets	11
7	Moni	toring	11
	7.1	Introduction	11
	7.2	Monitoring Framework	12
8	Abou	t this Document	12

Appendices

Appendix 1 - Evidence Base for AAP	12
Appendix 2 - Glossary	12
Appendix 3 - Policy Map Changes	12

1 About this Document

1.1 The Blackhorse Lane Area Action Plan Proposed Submission was published for statutory consultation during the period 18 March to 29 April 2013 for representations to be made on the soundness and legal compliance of the document.

1.2 This document has been prepared in accordance with Regulation 22(1)(c)(v) of the Town and Country Planning (Local Planning) (England) Regulations 2012 and sets out how many representations were made on the Blackhorse Lane Area Action Plan Proposed Submission Document, and a summary of the main issues raised in those representations.

1.3 Information on consultations undertaken and representations received at the earlier stages of the preparation of the Blackhorse Lane Area Action Plan is included in a separate document prepared under Regulation 22(1)(c)(i-iv) of the Town and Country Planning (Local Planning) (England) Regulations 2012.

Representations Made (Regulation 20)

1.4 In total 62 representations were received from 19 consultees. The schedule below contains a summary of the main issues raised in the representations. These are matters of soundness as considered by consultees.

2 Introduction

Consultee Ref. No	Summary of Main Issues
Greater London Authority (bhlps57)	Would be useful for document to included better signposting to other DPDs, and the AAP should be more visionary and ambitious in terms of the scale of development proposed

2.1 What will the Area Action Plan do?

Consultee Ref. No	Summary of Main Issues
	No issues raised

2.2 Context

Consultee Ref. No	Summary of Main Issues
	No issues raised

2.3 Key issues

Consultee Ref. No	Summary of Main Issues
	No issues raised

3 Vision and Objectives

3.1 Vision

Consultee Ref. No	Summary of Main Issues
	No issues raised

3.2 Objectives

Consultee Ref. No	Summary of Main Issues
Lee Valley Estates (bhlps15)	Vision and objectives supported
Lee Valley Regional Park Authority (bhlps48)	Key diagram should show improvements to Forest Road and proposed entrances to Walthamstow Wetlands

4 Key Policy Areas

4.1 Introduction

Consultee Ref. No	Summary of Main Issues
	No issues raised

4.2 Housing

Consultee Ref. No	Summary of Main Issues
Lee Valley Estates (bhlps16)	Housing targets for the area should be increased to at least 2500 new homes
Industrial Property Investment Fund (bhlps28)	Policy BHL3 should be amended to allow for higher density development at alternative sites based on site specific circumstances
Workspace Group (bhlps41)	Provision should be made for higher density developments at a range of sites, based on site specific circumstances
Hollivale Blackhorse Lane LLP (bhlps21/24)	Request removal of requirement for minimum of 30% 3 and 4 bed units on site BHL1
Industrial Property Investment Fund (bhlps29)	Developments at the station hub should not be required to provide at least 30% family housing
Transport for London (bhlps36)	Requirement for 30% family housing at the Station Hub is too onerous
Industrial Property Investment Fund (bhlps30)	Affordable housing policy should place greater emphasis on viability
Workspace Group (bhlps42)	Policy wording should give greater reference to the impact of viability on affordable housing provision, and make greater allowances for off-site affordable housing provision.

Consultee Ref. No	Summary of Main Issues
Industrial Property Investment Fund (bhlps31)	Requirement for redevelopment of land last used for employment or training to demonstrate it is not fit for purpose should not apply to opportunity sites
Lee Valley Estates (bhlps17)	Land designated as SIL should be earmarked for mixed use development
Workspace Group (bhlps43)	A more flexible approach to SIL should be provided to allow mixed use developments in the future; opportunity sites should not be required to demonstrate existing employment land is unfit for purpose.
Greater London Authority (bhlps58)	Level of SIL release is supported, but it is important that remaining SIL is improved. Also suggested that Sutherland Road is completely de-designated as an industrial area and allocated for mixed use.

4.3 Employment

4.4 Neighbourhood Centre and Local Retail Parades

Consultee Ref. No	Summary of Main Issues
Hollivale Blackhorse Lane LLP (bhlps22)	Provision should be made for student accommodation within the neighbourhood centre.
Hollivale Blackhorse Lane LLP (bhlps25)	Site BHL1 and policy BHL7 should make provision for student accommodation to support the neighbourhood centre
Industrial Property Investment Fund (bhlps32)	Allowance should be made for some out of centre retail, where it does not undermine the role of the neighbourhood centre
Workspace Group (bhlps44)	Policy should acknowledge opportunities for out of centre retail

4.5 Design and Local Character

Consultee Ref. No	Summary of Main Issues
Workspace Group (bhlps45)	Policy should not place an upper limit on building heights, or restrict landmark locations to the station hub
Industrial Property Investment Fund (bhlps33)	Policy wording should not apply a rigid approach to building heights
Transport for London (bhlps38)	Proposed building heights are too restrictive
Lee Valley Regional Park Authority (bhlps52)	Guidance on building heights supported

4.6 Public Open Space and Nature Conservation

Consultee Ref. No	Summary of Main Issues
Lee Valley Regional Park Authority (bhlps49)	References to the Gun Site playing field should make clear that it remains within the Lee Valley Regional Park
Lee Valley Regional Park Authority (bhlps53)	Alterations to policy BHL9 since Preferred Options document supported
Greater London Authority (bhlps59)	The future of former gun site playing field needs clarifying
Thames Water (bhlps5)	Broad support for document, subject to minor wording alterations to respect the operational requirements of Walthamstow reservoirs
Lee Valley Regional Park Authority (bhlps54)	Support redrafting policy BHL10 since preferred options but request additional detail within the AAP of proposals contained in the Park Development Framework
Lee Valley Regional Park Authority (bhlps50)	AAP should incorporate additional justification of the statutory purpose of the regional park, and

Blackhorse Lane AAP Reg 22(1)(c)(v) - Summary of Main Issues

Consultee Ref. No	Summary of Main Issues
	relevant area proposals from the Park Development Framework.

4.7 Flood Risk

Consultee Ref. No	Summary of Main Issues
Environment Agency (bhlps4)	Policy supported
Thames Water Utilities Ltd (bhlps6)	Flood risk section of document supported. Attention drawn to the importance of maintenance of SuDs to ensure their effectiveness.

4.8 Transport

Consultee Ref. No	Summary of Main Issues
Greater London Authority (bhlps61)	Reference should be made for the need for planning applications to include adequate provision for buses and taxis. Reference to extension of 76 and 41 bus routes should be removed.

4.9 Climate Change and Decentralised Energy

Consultee Ref. No	Summary of Main Issues
Greater London Authority (bhlps60)	Whilst aspiration for a decentralised energy network is welcomed, policy on energy should be expanded to reflect the London Plan targets, and make clear the hierarchy of preference for energy systems

4.10 Social Infrastructure

Consultee Ref. No	Summary of Main Issues
	No issues raised

5 Opportunity Sites

5.1 Introduction

Consultee Ref. No	Summary of Main Issues
Thames Water Utilities Ltd (bhlps7)	Cross references to DM policies regarding water infrastructure would be helpful so the requirement for developers to ensure adequate provision of water and waste water infrastructure is clear. Thames Water should be consulted on most major applications.

5.2 Site BHL1 - Station Hub and Waterfront

Consultee Ref. No	Summary of Main Issues
Hollivale Blackhorse Lane LLP (bhlps20)	Site BHL1 should make provision for student accommodation
Industrial Property Investment Fund (bhlps34)	Provision should be made within the Station hub for retail outside of the neighbourhood centre; development should not be required to demonstrate

5.3 Site BHL2 North - Car Wash & Garage Site

Consultee Ref. No	Summary of Main Issues
	No issues raised

5.4 Site BHL2 South - Blackhorse Road/ Hawarden Road

Consultee Ref. No	Summary of Main Issues
Greater London Authority (bhlps62)	The 'access' section of the site description should refer to the need for a transport assessment

5.5 Site BHL3 - Willowfield School, Tavistock Avenue

Consultee Ref. No	Summary of Main Issues
	No issues raised

5.6 Site BHL4 North - Sutherland Road

Consultee Ref. No	Summary of Main Issues
	No issues raised

5.7 Site BHL4 South - Sutherland Road

Consultee Ref. No	Summary of Main Issues
E & R Fuller Ltd (bhlps26)	Provision should be made for taller building heights and a greater proportion of residential development at site BHL4 South

5.8 Site BHL5 - Papermill Place

Consultee Ref. No	Summary of Main Issues
	No issues raised

5.9 Site BHL6 - Webb's Industrial Estate

Consultee Ref. No	Summary of Main Issues
	No issues raised

5.10 Site BHL7 - Billet Works

Consultee Ref. No	Summary of Main Issues
Greater London Authority (bhlps63)	The Infrastructure Plan should not reference the 158 bus route as the specific recipient of contributions from site BHL7

5.11 Site BHL8 - 152/154 Blackhorse Road

Consultee Ref. No	Summary of Main Issues
	No issues raised

5.12 Site BHL9 - Former Essex Arms Public House

Consultee Ref. No	Summary of Main Issues
	No issues raised

5.13 Site BHL10 - Marine Engine House

Consultee Ref. No	Summary of Main Issues
	No issues raised

5.14 Site BHL11 - Old Coppermill

Consultee Ref. No	Summary of Main Issues
	No issues raised

5.15 Discounted sites

Consultee Ref. No	Summary of Main Issues
Workspace Group (bhlps46)	Uplands Business Park should be considered as an opportunity site for mixed use development

6 Implementation

6.1 Introduction

Consultee Ref. No	Summary of Main Issues
Lee Valley Regional Park Authority (bhlps55)	A clear reference to CIL and or s106 moneys securing benefits to the regional park should be inserted

6.2 Infrastructure Plan

Consultee Ref. No	Summary of Main Issues
	No issues raised

6.3 Indicative Development Targets

Consultee Ref. No	Summary of Main Issues
	No issues raised

7 Monitoring

7.1 Introduction

Consultee Ref. No	Summary of Main Issues
	No issues raised

7.2 Monitoring Framework

Consultee Ref. No	Summary of Main Issues
	No issues raised

8 About this Document

Appendix 1 - Evidence Base for AAP

Consultee Ref. No	Summary of Main Issues
	No issues raised

Appendix 2 - Glossary

Consultee Ref. No	Summary of Main Issues
	No issues raised

Appendix 3 - Policy Map Changes

Consultee Ref. No	Summary of Main Issues
	No issues raised