

BLACKHORSE LANE

Strategic Industrial Location

MASTERPLAN FRAMEWORK STAGE TWO



Waltham Forest

March 2022

GLA Sign-off June 2022

Executive summary

Blackhorse Lane Strategic Industrial Location (SIL) is a changing industrial area in London Borough of Waltham Forest (LBWF) and is home to a growing number of small businesses, makers, and breweries. In recent years, the Blackhorse Lane area has become a more desirable place to live, work and visit.

The GLA and LBWF's policies seek to intensify industrial uses, to make better use of land and to strengthen their role in supporting growth in London's economy and population. Policy supports masterplan approaches to intensify industrial capacity in SILs and to free up land to meet other planning objectives, such as housing and infrastructure. Blackhorse Lane SIL Framework responds to this policy, providing a comprehensive vision and strategy for the re-development of the SIL.

The Framework is underpinned by evidence of the SIL's social, economic and environmental nature (summarised in chapter 2) as well as extensive engagement with businesses, landowners and the wider community (summarised in chapter 3). A vision (chapter 4) and spatial framework (chapter 5) set out principles and guidance to guide the SIL's evolution.

Any redevelopment will be industry-first, with the aim of providing modern, high quality industrial space, with increased floorspace in the north and the east. Intensification will be delivered by modern industrial building typologies, informed by engagement and precedent elsewhere.

The Framework promotes the introduction of other uses – new homes, shops and amenities – to create a vibrant mixed-use neighbourhood. Guidance around Agent of Change principles will require new development to mitigate for potential impacts (noise, odour and air quality, visual amenity, hours of operation and lighting) to protect the operations of the existing

businesses. The framework identifies high level infrastructure requirements to support the growing community of residents and businesses, including health care, education and utilities.

Any future development will be informed by sustainability best practice and integrate green infrastructure, sustainable transport, low-energy buildings, and carbon-neutral energy supply.

The Framework sets out a more permeable block structure and network of streets. The movement strategy balances the need for effective industrial servicing and safe, comfortable walking and cycling routes. The masterplan proposes new public and green spaces, notably a waterside linear park on the edge of the Wetlands, a green route following the alignment of the Dagenham Brook and a series of public spaces with different character and uses diagonally through the centre of the SIL. These spaces will meet the requirements of the growing community and will connect the SIL into the wider green-network, forming part of a day-out loop for local people.

The framework provides a design-led approach to height and massing. The SIL is seen as an appropriate location for Tall and Taller buildings, but these should be exceptional in design. A low or mid-rise frontage should be provided to Blackhorse Lane and the Wetlands, with buildings stepping up in height and marking key spaces in the centre of the SIL.

Sub-area strategies consider these urban principles at a different scale, considering delivery of sites in the north, central and southern area.

Given the multiple land ownerships in the SIL, the strategy is set out to unlock independent, phased delivery. The next steps for landowners would be to engage with businesses and neighbouring landowners to set a more detailed sub-area strategy and ultimately to put forward a planning application.



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1 INTRODUCTION

1 Introduction

1.1 Role of the masterplan

- 1.1.1 Blackhorse Lane Strategic Industrial Location (SIL) is a changing industrial estate in London Borough of Waltham Forest. The popularity of the area as a place to live, work and visit is growing, which has highlighted the site's potential to deliver more.
- 1.1.2 Given the loss of industrial land across London in recent years, the London Plan seeks to protect industrial capacity and to encourage intensification and investment. These ambitions are reflected in LB Waltham Forest's emerging Local Plan (LP1).
- 1.1.3 The emerging LP1 supports the comprehensive industrial-led redevelopment of the SIL as part of the new Creative Enterprise Zone, with links to Walthamstow Wetlands and cultural infrastructure. It recognises the unique character of existing businesses and the importance of the SIL. The plan also supports Blackhorse Lane as a strategic location to support regeneration of the neighbourhood centre. Given these ambitions, a comprehensive masterplan approach is needed to guide sustainable change in Blackhorse Lane SIL in the coming decade.
- 1.1.4 The masterplan will (1) provide the evidence base for the revision of the SIL boundary based on intensified industrial uses in the northern area. This will establish a framework for industrial intensification and provide controls to the Council to protect industrial uses if development happens; (2) provide a plan to overcome delivery challenges relating to the complex and diverse ownership that typifies the SIL, unlocking the development of the area; and (3) to demonstrate and help realise the potential placemaking benefits for co-location of industrial and non-industrial uses in the central and southern sub-areas.
- 1.1.5 The framework will provide a coordinated plan across the whole of the existing Blackhorse Lane SIL for: industrial re-provision; streets and urban blocks; scale and massing principles; access and servicing principles; public realm; integrating compatible uses and sustainability. The framework should be used as guidance for future development.
- 1.1.6 The masterplan process of Blackhorse Lane is seen as proactive step in the councils COVID-19 Recovery Plan in the medium to long term. It aims to safeguard the future success of the area and maximise its potential for the local community and the wider economy.

A distinctive SIL..

Stage 1 of this framework document and its supporting evidence base confirms that the Blackhorse Lane SIL benefits from a distinctive set of characteristics, which offer the opportunity for both intensifying industrial uses (Classes E3(g)(ii and iii), B2 and B8), alongside introducing non-industrial uses (such as residential (Class C3)) within the SIL. Whilst the Stage 1 report sets this out in extensive detail (see Chapters 2 and 3 and Appendices 1, 2 and 3) these key distinctive characteristics include:

- The SIL is part of the designated Blackhorse Lane Creative Enterprise Zone (CEZ);
- The Blackhorse Lane area is located within the Mayor's wider Upper Lee Valley Opportunity Area;
- The SIL is also located within a Mayoral Housing Zone;
- A number of SMEs, mostly working on manufacturing, artists/creative and makers sectors (many of which have innovative customer facing service-orientated functions which are enlivening the area);
- The SIL is home to a number of other non-industrial uses within the education, business and creative sectors and contributes to just 0.4% of London's SIL land (see Stage 1 Section 2.3);
- The SIL is located adjacent to the Walthamstow Wetlands which offers unique placemaking opportunities;
- The SIL benefits from being within close proximity to the Blackhorse Lane Neighbourhood Centre and London Underground/Overground Stations; and
- The SIL is not located close to rail and water freight infrastructure, or the Strategic Road Network and is surrounded by a mix of non-industrial uses.



1.2 Project process

1.2.1 The approach to producing the Blackhorse Lane SIL Framework follows the processes set out in policies E5 and E7 of the London Plan as well as the GLA's 2018 Practice Note for Industrial Intensification and emerging LP1 Policy 30. In this context the Framework confirms the following:

- A comprehensive approach which considers the whole SIL has been undertaken in developing this Framework and will be considered in further detail for the identified individual sub-areas (Sections 2, 4 and 5 specifically albeit the document should be read as a whole and in line with sub-area specific details produced in due course).
- This document provides the evidence base to support a revised SIL boundary with SIL uses intensified as part of a borough-wide strategy and industrial space co-located with new uses on the remainder of the area to deliver overall growth in industrial space and job numbers.
- Development across the retained SIL and re-designated Locally Significant Industrial Site (LSIS) will ensure re-provision of industrial floorspace as a minimum with new SIL designations elsewhere in the Borough maintaining the overall provision of SIL capacity. It will also ensure that industrial floorspace can be delivered ahead of other uses (see section 6.1 and subsequent sub-area specific documents).
- Development within the SIL should provide uses in line with LP1 emerging Policy 26 (see section 2.9 for existing uses and sections 4-5). The remaining land within the Framework boundary will be released from SIL and re-designated as LSIS (which then be formally confirmed with LBWF's LP2 Site Allocations Development Plan Document) and will thus offer scope for the co-location of industrial and other non-industrial uses.
- Development within this area (i.e. proposed LSIS)

should provide uses in line with London Plan Policy E6 and emerging LP1 Policy 27.

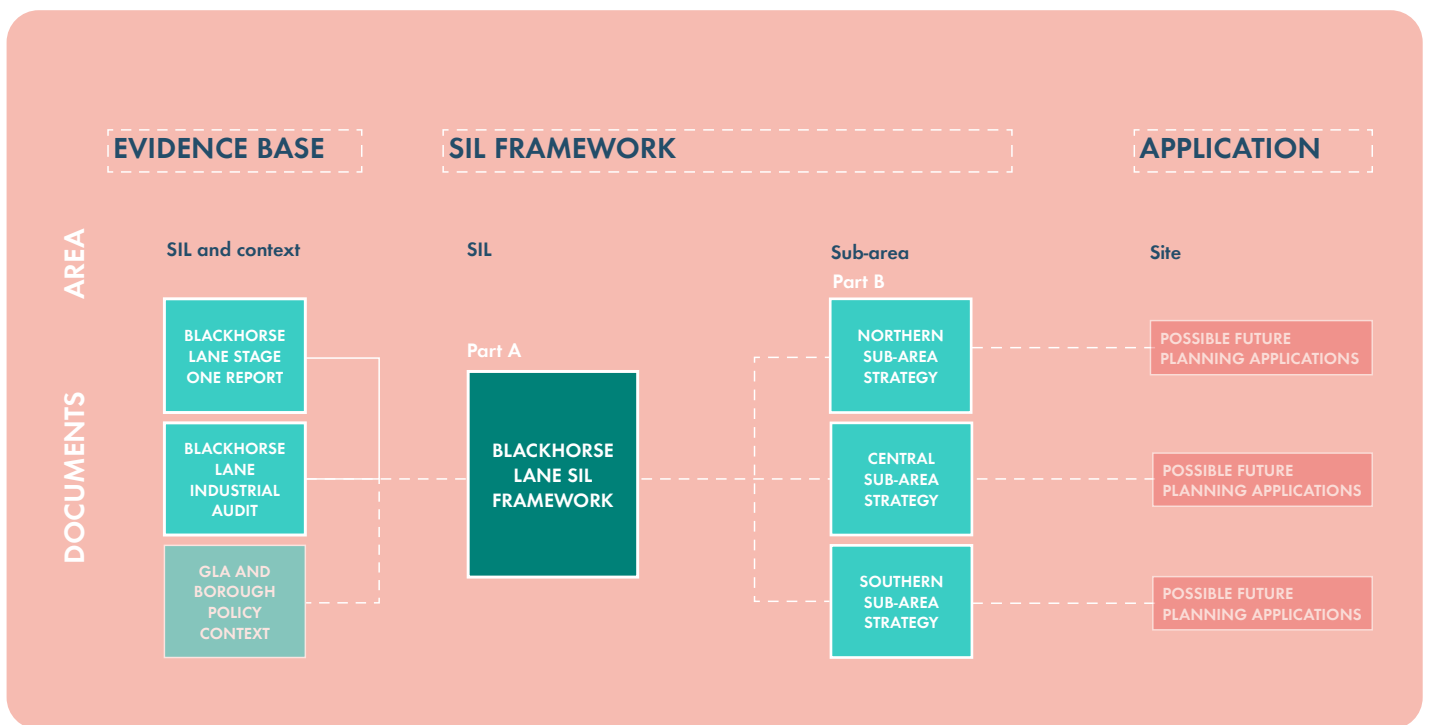
- In the remainder of the area, industrial uses will be provided in line with the following policies:
- Upgraded industrial floorspace which is fit for purpose would be provided (see section 5.2 for typologies with further details provided at the sub-area and individual application stages).
- The approach set out closely follows the Borough's special character and vision for the Blackhorse Lane Area (emerging LP1 Appendix 2) i.e. a continued focus for creative and cultural industries, manufacturing, and maker and production space, strengthening the area's Creative Enterprise Zone Designation and it's growth as a neighbourhood centre where people can both work and live.
- It is being delivered in collaboration with the Council, GLA and other stakeholders including landowners, local businesses and the wider community (see section 3).
- In line with the requirements of the London Plan and emerging LP1 document a two stage process is being undertaken (see pp. 6 of this document):

Stage 1 - evidence base: including the preparation and issue of the Stage 1 Blackhorse Lane Report and associated Industrial Land Audit which together identify Sub Areas of Intensification and Consolidation and those areas suitable for release and re-designation to LSIS land;

Stage 2 - SIL Framework:

Part A) including this framework document considering the baseline industrial position and context, engagement activities, potential for industrial intensification, spatial vision and framework for development and requirement for Part B documents; and

Part B) Sub-area specific framework documents



providing further information and detail at the sub-area scale including urban framework, key edge conditions, movement and access, approach to safety and security and managing any area specific constraints such as contamination, as well as phasing and delivery of development including industrial capacity.

documents) will be expected to be supported by a Viability and Deliverability Plan, a Retention and Relocation Strategy and a specific Servicing Strategy.

- An overarching approach to managing servicing and movement (see section 5.6) which will be addresses in further detail in the sub-area specific documents.
- That local businesses will be encouraged to stay in the SIL as part of proposals for intensification (see p.196). Future space should be operational and meet businesses' needs, informed by evidence and engagement at the sub-area specific stage (see p.80 and Section 3 on engagement to date).
- Sub-area specific frameworks (stage 2 Part B

2 CONTEXT



Figure 1 SIL area

2 Wider spatial context

2.1 Location and description

- 2.1.1 The Blackhorse Lane Strategic Industrial Location (SIL) is located in LB Waltham Forest, cradled between the Walthamstow Wetlands to the west and Blackhorse Lane to the east. The SIL is well-connected by public transport; the southern end of the SIL is less than a 250m walk to Blackhorse Road Station, with access to the Victoria Line and the Gospel Oak-Barking Overground Line.
- 2.1.2 The SIL is largely set amongst residential neighbourhoods. These communities are provided for by small local centres on Blackhorse Lane and in Higham Hill. Through the redevelopment of the site, there is an opportunity to expand the offer to the local community in terms of amenities, culture, recreation and leisure.
- 2.1.3 The SIL is set within the Lee Valley. The Lea River originates from the Chiltern Hills and flows south east, working its way through east London until it meets the River Thames at Leamouth. It is one of London's largest rivers and much has been canalised to provide a navigable route for boats.
- 2.1.4 A combination of factors led to the development of the Lee Valley as a significant industrial area for London: proximity to the City, prevailing winds, the availability of water power, cheap electrical power from Brimsdown Power Station and large expanses of inexpensive flat land. In the last 30 years, the Lee Valley has changed and evolved. There have been initiatives to conserve and protect London's natural habitats, including establishing the Queen Elizabeth Olympic Park and the adjacent Walthamstow Wetlands, which have enhanced the valley's role for leisure and as a green corridor. At the same time, the Lee Valley has evolved from its industrial roots to become home to creative mixed-use neighbourhoods, with notable developments in Hackney Wick, Sugarhouse Island and Tottenham Hale.
- 2.1.5 The site is near the western edge of LB Waltham Forest, with LB Haringey on the other side of the reservoirs and LB Hackney to the south west.

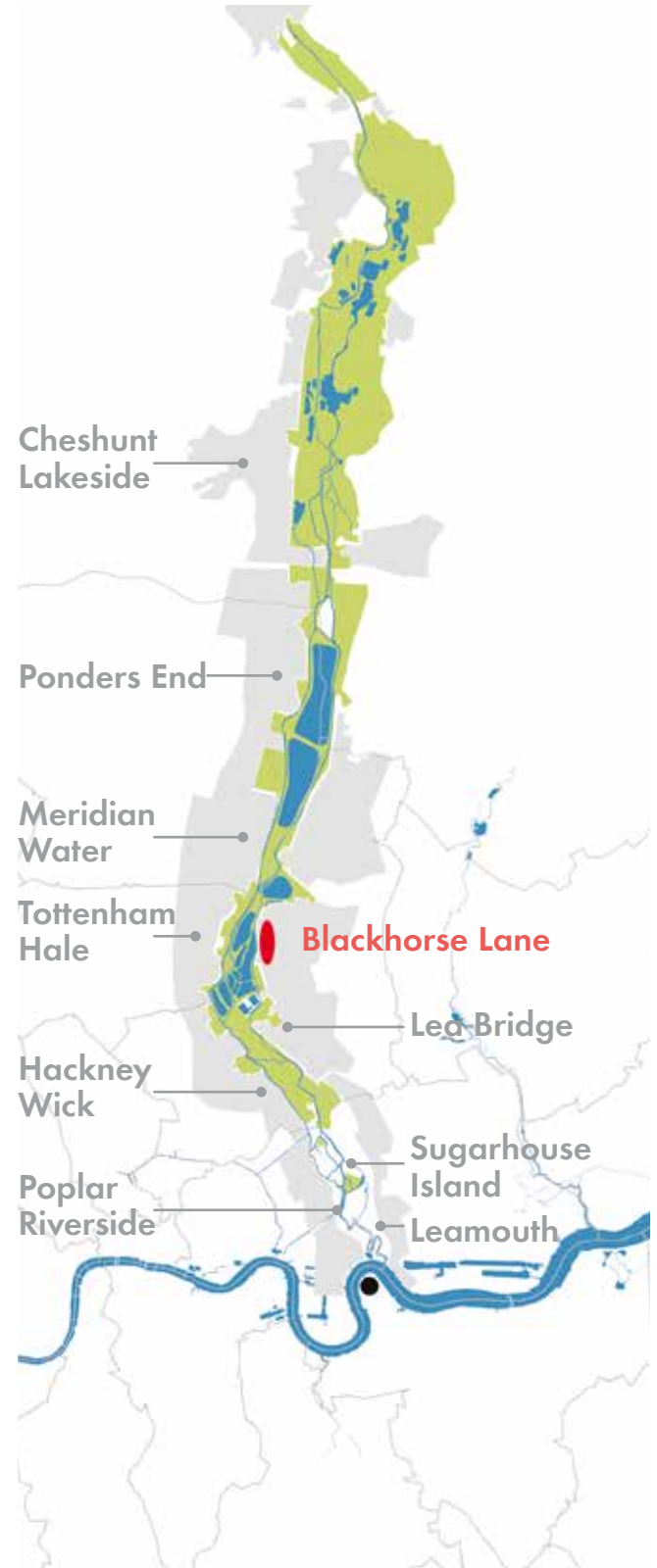


Figure 2 Lee Valley - a dynamic corridor for enterprise and industry

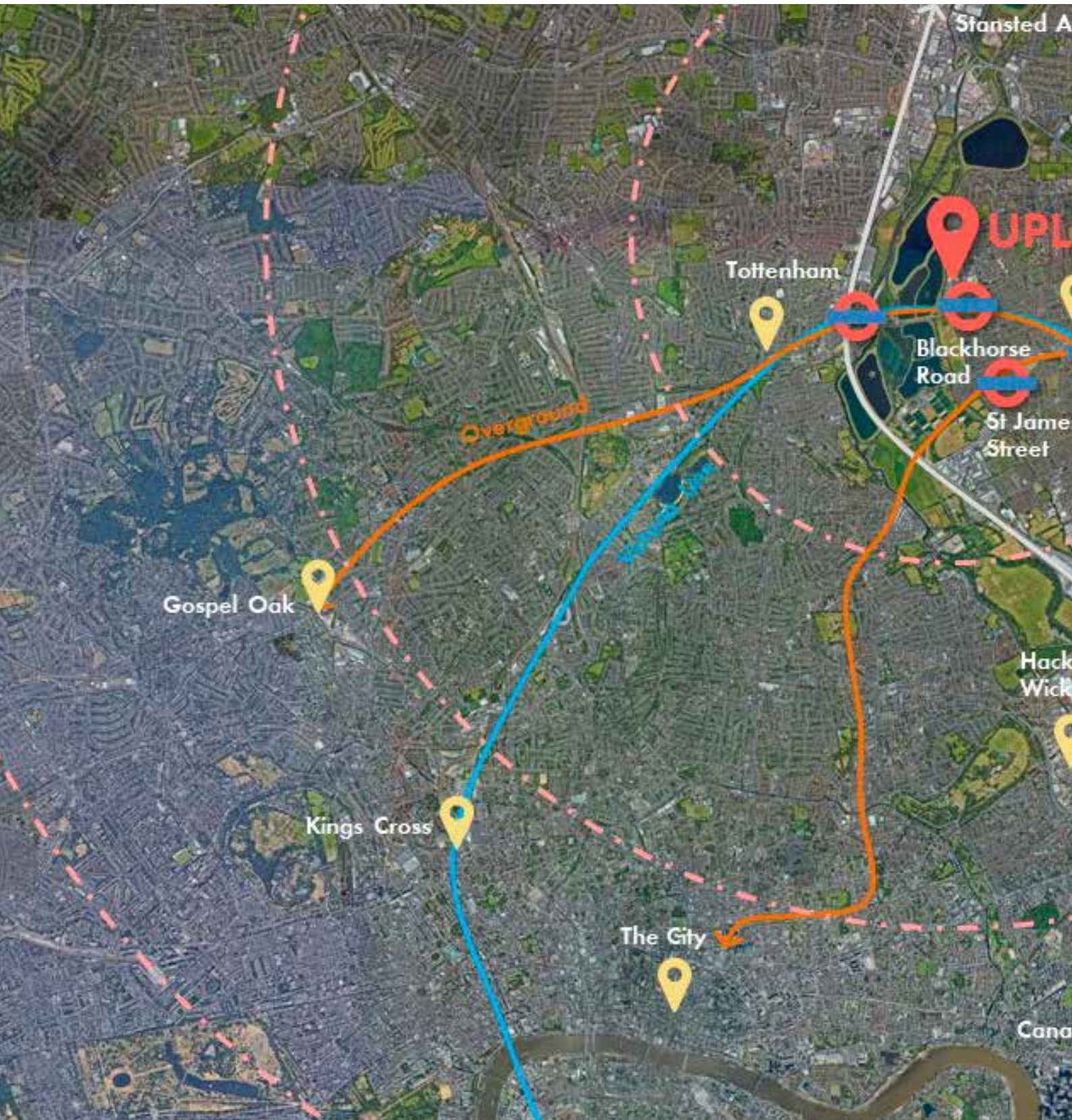
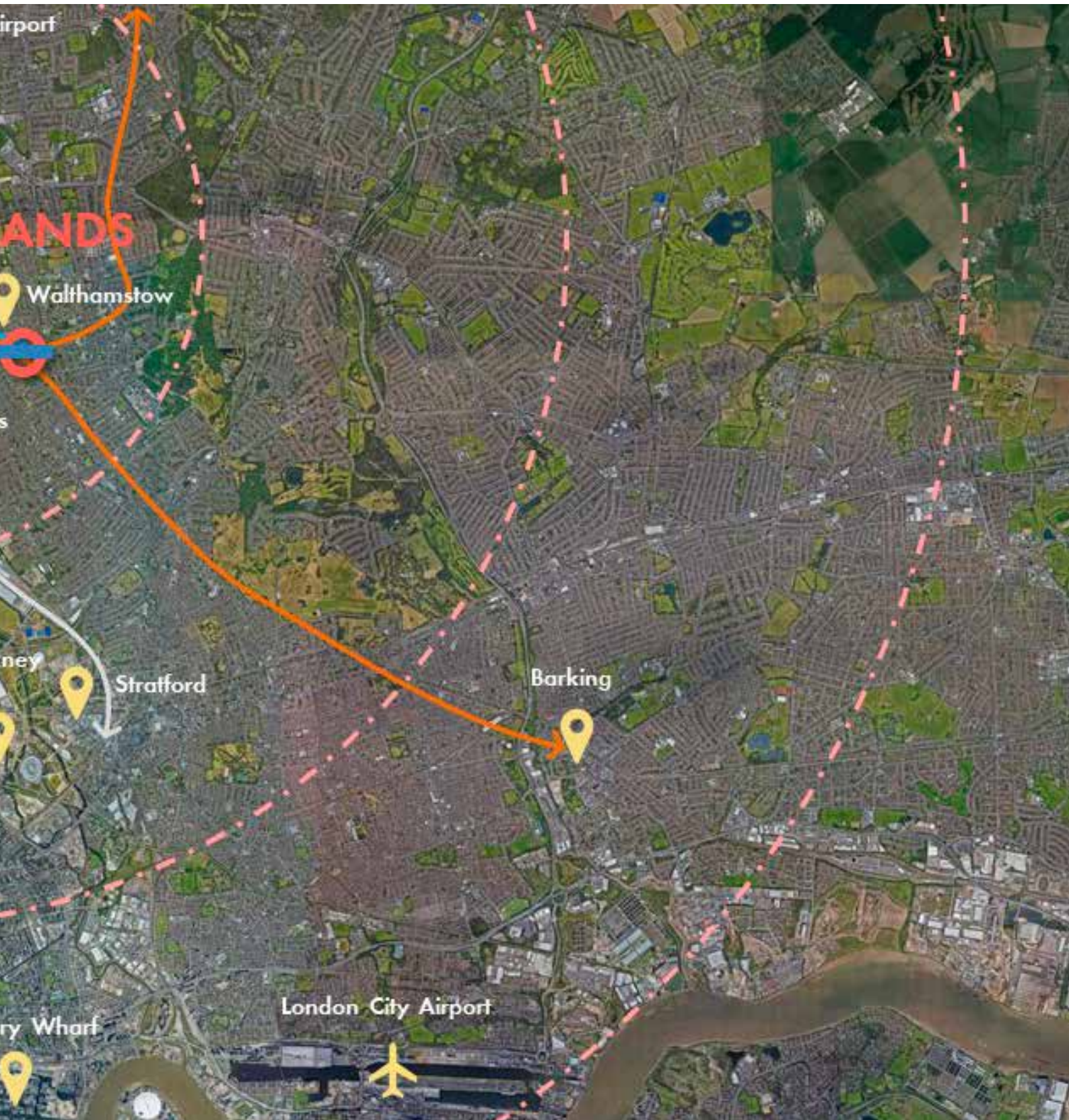


Figure 3 A connected district



At the turn of the century, the Lee Valley was fertile ground for industry, due to its proximity to London, access to water and energy, and the prevalence of cheap, flat land. The site was developed with warehouses and mills, while also being home to allotments and sports fields.



1865



1930

"Industrial growth accelerated when connections were improved by the opening of the new Ferry Lane bridge in 1915, and completion of the North Circular Road in 1925-30."

"Walthamstow remained an agricultural parish until the arable fields were enclosed and the railway was built in the mid 19th century."

1890

In 1890, nearby settlements like Tottenham were growing. East London Water Works was expanding and Blackhorse Road Station was recently built. The site remained largely undeveloped except for a few buildings along Blackhorse Lane, including Uplands House and the Royal Standard Public House.



"In the 1890s larger scale manufacturing began to move into Walthamstow. The new population provided labour, and the railway improved connectivity. The most significant growth was in electrical engineering and in manufacturing of motor vehicles, as well as a wave of new consumer goods."

Achille Serre, a French company which brought dry cleaning to England, moved to Blackhorse Lane. At its peak it employed 1,700 people. The company was so large it ran its own fire brigade staffed by women fire fighters.



The Victoria Line opened in 1968, allowing people living around Blackhorse Road to access work, education, and culture across the capital. At the time, it was estimated that 85 million people would use the line each year - today it carries more than 200 million passengers.

1960

1950



"The Lee Valley - London's privy, workshop and backyard".

By the second half of the 20th century, the site was dense with industry. Made on site: furniture, tyres, printing machinery, dry batteries, leather goods, propellers, omnibus and motors.



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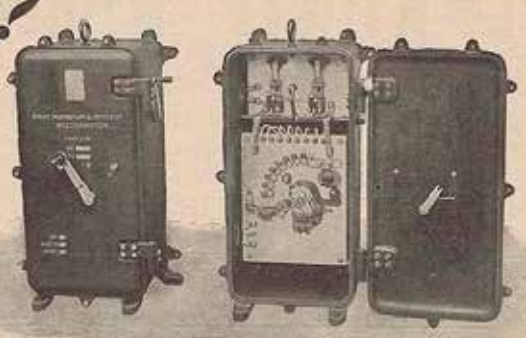
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Figure 4 Advertisements products made at Blackhorse Lane in the 20th century, © Grace's Guide to British History 20

B.M.R. 'DOCKYARD' Type Ratchet Starters.

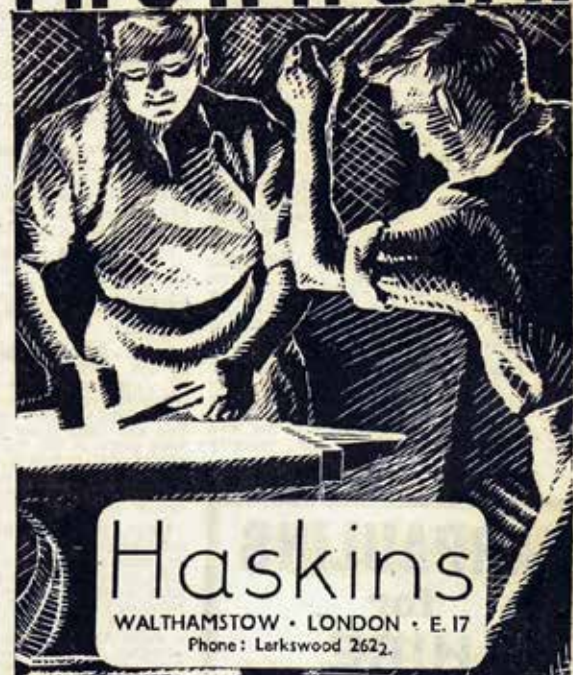


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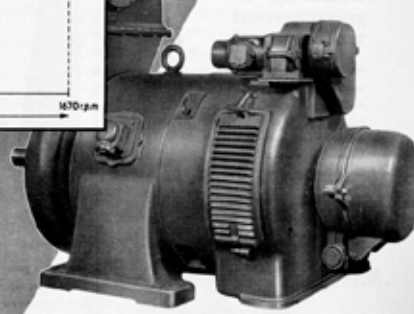
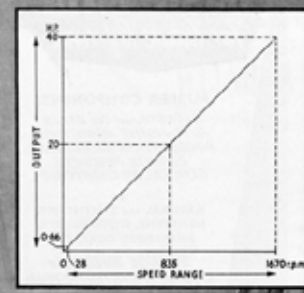
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"By 2005, construction of the Delta group was completed."



In the 1970s, the northern section of the site was intensified. Food producer Bush Boake And Allen opened a 'modern' factory complex for their operations (now home to Eden Girls' School). The pond was decorated with old millstones paying tribute to industry which came before.

1970

2000



"SIL was first designated in 2004 with the first iteration of the London Plan"


Warren Evans
BED MAKERS of LONDON

By the turn of the millennium, the volume of manufacturing jobs had fallen to less than 1,000 and typically non-industrial uses had started to appear including health and social work, and public sector site uses. Total employment on the site was 2,750.

By 2010 typical industrial uses such as manufacturing and wholesale trades continued to decline in terms of job numbers. Other uses, such as transport and storage saw an increase. The diversity of uses on the site continued, including the addition of arts, and community uses.



Through the 2010s, change was occurring across the Lee Valley, with creative uses taking up inexpensive space left vacant by industry. Blackhorse Lane gradually became known for 'makers' with the arrival of businesses like the Blackhorse Workshop (2014) and Blackhorse Lane Ateliers (2016).

2010

TODAY

In 2016, Walthamstow Wetlands opened. As a prime location for new homes, the southern part of the SIL area was de-designated and began to be redeveloped.



Today, the SIL continues to be home to a diverse mix of uses and businesses. Large manufacturing has left the site, with the exit of Warren Evans in 2018. In recent years, the SIL has seen the arrival of co-working space including Switchboard Studios and Yonder, and a rise in artisan manufacturing with the arrival of businesses such as Signature Brewery, All Plants, Square Mile Roasters and Minor Figures. LB Waltham Forest has designated Blackhorse Lane as a Creative Enterprise Zone.





2.2 History and heritage

- 2.2.1 While the SIL area has a rich industrial history, there are no listed buildings on site. Nearby heritage assets include the locally listed Marine House which was the pumping station for the East London Waterworks Company erected in 1894, the Grade II listed Ferry Boat Inn and locally listed 16 Blackhorse Lane. Building on the area's industrial heritage, a more active relationship to the water and to the surrounding residential neighbourhoods should be re-created. In addition, the SIL has a strong history of making which could be reinterpreted and celebrated through future design and use.
- 2.2.2 As can be seen from historic maps, the site developed relatively quickly in the first half of the 20th century. The structure of the site still resembles that from 1930, with the street network and grain remaining largely unchanged. Since then, the north part of the site has been intensified, with the construction of a 'modern' factory complex (now Eden Girls' School), as well as the construction of Delta Group and Lockwood Way.
- 2.2.3 It is notable that this later wave of development demonstrates a change in typology and unit size, away from large-scale warehouses towards smaller units and multi-storey buildings. Similarly, existing large warehouses have been subdivided into much smaller units. This is reflective of the changing nature of industry in the area, away from large-scale, traditional industry towards artisan manufacturing.
- 2.2.4 The River Lea Archaeological Priority Area Assessment (2020) suggests there is potential for archaeological remains to be found on this site due to the original development of settlements in the borough running along the western boundary edge onto the River Lea / Lee Navigation / Lee Flood Relief channel where Bronze age remains have been identified previously. Policy 75 in the emerging LP1 sets out how proposals that affect APA's can be supported through provision of various investigations, assessments, protection measures in accordance with National Policy.



Figure 6 Listed buildings in the area

LONDON'S FIRST BOROUGH OF CULTURE



WALTHAMSTOW WETLANDS



CREATIVE ENTERPRISE ZONE



ENJOY WALTHAM FOREST



2.3 Planning policy and strategic context

Development Plan

2.3.1 The site is located within the London Borough of Waltham Forest (LBWF). The adopted Development Plan for the site comprises:

- London Plan (March 2021);
- LBWF Core Strategy (2012);
- Development Management Policies (DMP) (2013); and
- Blackhorse Lane Area Action Plan (BLAAP) (2015).

It should be noted that where London Plan Policy references the Use Class Order this does take into consideration the introduction of the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 which included the introduction of Class E (which now incorporates those uses previously within Class A1, A2, A3 & B1 (a, b and c) as well as certain uses previously within Class D and not covered by new Use Class F); the removal of Class A4 and A5 uses which are now defined as 'Sui Generis'; and the removal of Class D and inclusions of new Use Class F (F1 Learning and non-residential institutions and F2 Local Community uses). Both Use Class B2 and B8 remain unchanged. Any proposals for redevelopment within the SIL should be brought forward in line with the latest Use Class Order.

Emerging Policy

2.3.2 It is important to note the emerging policy framework in which we are working that comprises:

- LB Waltham Forest Local Plan (October 2020) comprising:
 - Part 1 (LP1): Strategic Policies (Reg. 19 - October 2020) (LP1)
 - Part 2 (LP2): Site Allocations (Reg. 18 – October 2020) (LP2)

2.3.3 A complementary Supplementary Planning Document (SPD) will also be prepared by the Council (expected to be published later in 2021) dealing solely with industrial/employment uses and floor space in the Borough.

Industrial Policy

2.3.4 This Framework has evolved by taking in to consideration the key industrial policy context as set out by the adopted Development Plan, as well as the emerging policy noted.

Upper Lee Valley OAPF

2.3.5 The Upper Lee Valley OAPF targets facilitating significant growth in both jobs and new homes in the Blackhorse Road area.

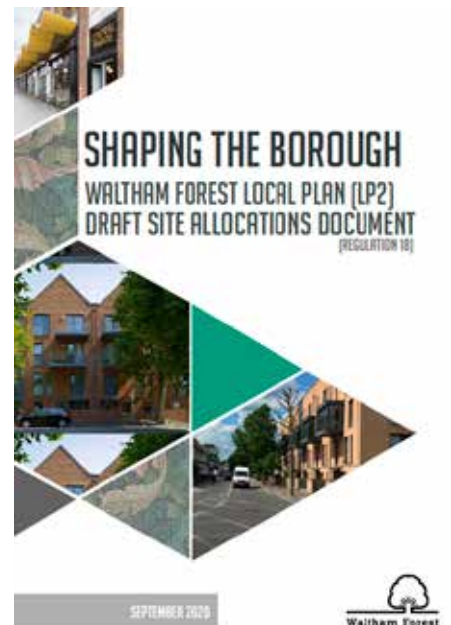
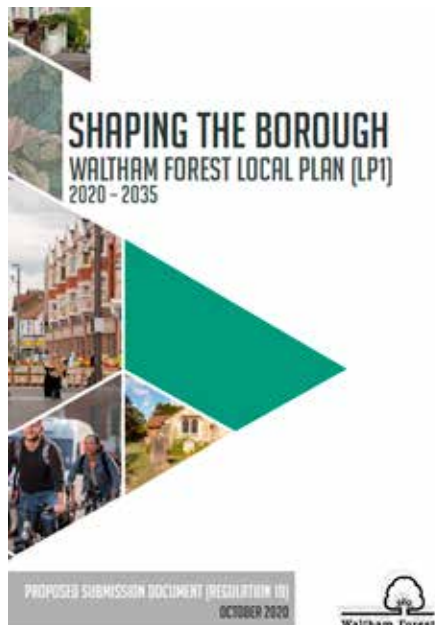
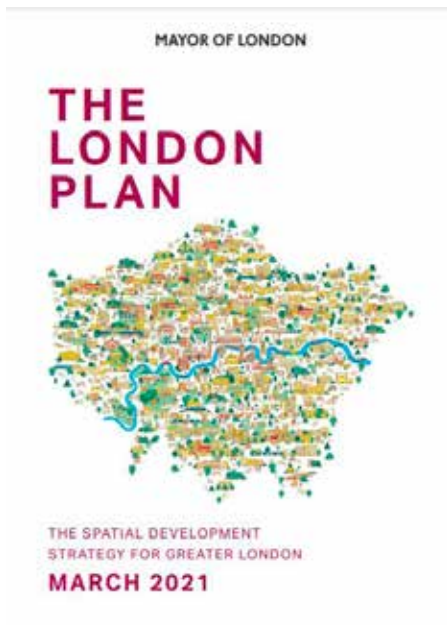
London Plan

2.3.6 Policy SD1 sets out the Mayor's approach to ensuring Growth Corridors and Opportunity Areas (OA) fully realise their growth and regeneration potential and confirms (part B(6)) boroughs should support and sustain SILs by considering opportunities to intensify and make more efficient use of land in SIL. The Plan states (paragraph 2.1.31) that the Lee Valley OA provides opportunities for growth in, inter alia, Blackhorse Lane including high density development. The Plan seeks to: *'ensure that industrial, logistics and commercial uses continue to form part of the overall mix of uses in the area, with no net loss of industrial floorspace capacity, and that opportunities for intensification of industrial land and co-location of industrial and residential uses are fully explored. Tottenham and Walthamstow contain clusters of creative industries which should be protected and supported'* (paragraph 2.1.33).

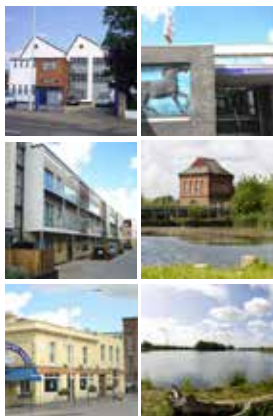
2.3.7 Of importance, Policy E4 requires Boroughs to maintain a sufficient supply of land and premises for industrial uses, taking into account "strategic and local employment land reviews, industrial land audits and the potential for intensification, co-location and substitution". Part C of the policy states that any release of industrial land in order to manage issues of long-term vacancy and to achieve wider planning objectives, including the delivery of strategic infrastructure, should be facilitated through the processes of industrial intensification, co-location and substitution, as set out in Policy E7.

"Redevelopment of existing employment land at the Uplands Business Park area to create a new sustainable neighbourhood, providing high density employment-led mixed use development with Light Industrial/ Manufacturing/Production space, workspace and appropriate cultural uses; alongside new quality homes"

LBWF emerging LP1



Waltham Forest Local Plan



BLACKHORSE LANE AREA ACTION PLAN

Adopted January 2015

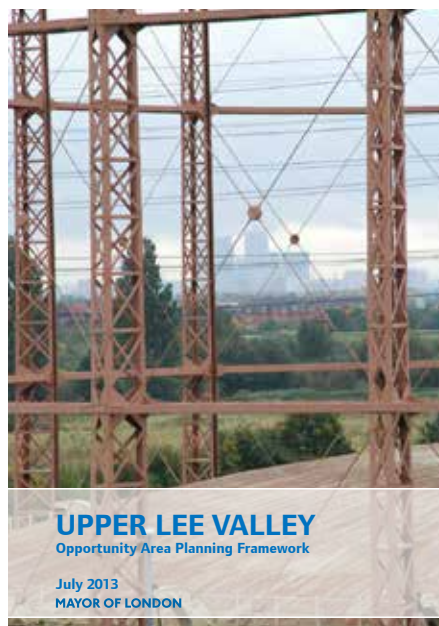


Figure 7 Planning policy documents

- 2.3.8 Part D confirms that retention, enhancement and provision of additional industrial capacity will be prioritised in locations that:
- Are accessible to the strategic road network and/or have potential for the transport of goods by rail and/or water transport.
 - Provide capacity for logistics, waste management, emerging industrial sectors or essential industrial-related services.
 - Provide capacity for micro, small and medium-sized enterprises.
 - Are suitable for 'last mile' distribution services to support large-scale residential or mixed-use developments.
 - Support access to supply chains and local employment in industrial and related activities.
- 2.3.9 Any release of industrial capacity should be focused in locations which are well connected by public transport, walking and cycling (Part E).
- 2.3.10 Policy E5 Part B (3) encourages boroughs in their Development Plans to define the detailed boundary of SILs and: *'Explore opportunities to intensify and make more efficient use of land in SILs in Development Plan reviews and through Opportunity Area Planning Frameworks in collaboration with the GLA and other planning authorities within and outside London (Policy E7 Industrial intensification, co-location and substitution).'*
- 2.3.11 The policy then (Part B (4)) states that Boroughs should *'strategically coordinate Development Plans to identify opportunities to substitute industrial capacity and function of Strategic Industrial Locations where evidence that alternative, more suitable, locations exist. This release must be carried out through a planning framework or Development Plan Document review process and adopted as policy in a Development Plan. All Boroughs are encouraged to evaluate viable opportunities to provide additional industrial land in new locations to support this process. This*
- policy should be applied in the context of Policy E7 Industrial intensification, co-location and substitution.'*
- 2.3.12 Part D states that proposals within SILs should not compromise the integrity or effectiveness of these locations in accommodating industrial activities. Residential development should be designed (through layouts, access, orientation, servicing, public realm, air quality and soundproofing) to ensure that existing or potential industrial activities in SIL are not compromised.
- 2.3.13 London Plan Policy E6 confirms Boroughs are expected to make clear the range of industrial and related uses that are acceptable in LSIS including, where appropriate, hybrid or flexible B1c/B2/B8 suitable for SMEs and distinguish these from local employment areas that can accommodate a wider range of business uses.
- 2.3.14 London Plan Policy E7 addresses intensification, co-location and substitution of land for industry, logistics and services. The policy promotes the intensification of business activities in Use Classes B1c (now class Eg(iii)), B2 and B8 through, inter alia, the development of multi-storey schemes and the more efficient use of land through higher plot ratios. Part B states:
- 2.3.15 *'Development Plans and planning frameworks should be proactive and consider, in collaboration with the Mayor, whether certain logistics, industrial and related functions in selected parts of SIL or LSIS could be intensified to provide additional industrial capacity. Intensification can also be used to facilitate the consolidation of an identified SIL or LSIS to support the delivery of residential and other uses, such as social infrastructure, or to contribute to town centre renewal. This process must meet the criteria set out in Part D below. This approach should only be considered as part of a plan-led process of SIL or LSIS intensification and consolidation (and the areas affected clearly defined in Development Plan policies*

maps) or as part of a coordinated masterplanning process in collaboration with the GLA and relevant borough, and not through ad hoc planning application. In LSIS (but not in SIL) the scope for co-locating industrial uses with residential and other uses may be considered. This should also be part of a plan-led or masterplanning process.'

2.3.16 Part D states that the process as set out within part B (above) must ensure that:

- '1) the industrial and related activities on-site and in surrounding parts of the SIL, LSIS or Non-Designated Industrial Site are not compromised in terms of their continued efficient function, access, service arrangements and days/hours of operation noting that many businesses have 7-day/24-hour access and operational requirements
- 2) the intensified industrial, storage and distribution uses are completed in advance of any residential component being occupied
- 3) appropriate design mitigation is provided in any residential element to ensure compliance with 1 and 2 above with particular consideration given to:
 - a) safety and security
 - b) the layout, orientation, access, servicing and delivery arrangements of the uses in order to minimise conflict
 - c) design quality, public realm, visual impact and amenity for residents
 - d) agent of change principles
 - e) vibration and noise
 - f) air quality, including dust, odour and emissions and potential contamination'

2.3.17 The GLA's 'Industrial intensification and co-location through plan-led and masterplan approaches Practice Note' (November 2018) provides further guidance on the masterplan approaches as set out by Policy E7. The approach taken for Blackhorse Lane has sought to align with the guidance included within this practice note.

Adopted Local Policy

2.3.18 Core Strategy Policy CS8 states LBWF will promote, protect and manage its defined SILs. DMP Policy DM18 confirms Class B2 General Industry, Storage/ Distribution (Class B8) and Class B1 small scale ancillary Offices will be supported in SILs and the loss of SIL to any alternative uses will be resisted.

2.3.19 Blackhorse Lane AAP Policy BHL6 sets out the approach to employment land within the AAP. The AAP includes the disposal of SIL land to the south of the Uplands Business Park to facilitate the Borough's aspirations for the growth around Blackhorse Road station.

Emerging Local Policy

2.3.20 LP1 emerging Policy 4 sets the Borough's approach to the location and management of growth via a series of strategic locations. Blackhorse Lane is identified within the Central Waltham Forest area whereby 6,000 new homes and 1,600 additional jobs are expected to be delivered. Part E of the policy supports: 'Making effective use of previously developed land'. In considering suitable sites for growth proposals redevelopment of underused and vacant land, in particular, sites listed on the Brownfield Land Register will be prioritised'. Similarly, LP1 emerging Policy 6 which seeks to ensure good growth adds further support to the principle of making efficient use of land 'through intensification and mixed use development', with LP1 emerging Policy 7 further encouraging the principle of mixed use development.

2.3.21 LP1 emerging Policy 2 and Policy 25 confirms

the Council is aiming to deliver a net increase of 52,000sqm of employment floorspace across the Borough by 2035. The emerging Policy confirms the delivery of new Class E Part G iii, B2 and B8 floorspace in SIL, LSIS, BEA, and non-designated employment sites, where (Part D of Policy 25) it does not lead to an overall loss of employment floorspace across the borough. LP1 emerging Policy 10 addresses the Central Waltham Forest area, confirming Blackhorse Lane as strategic location which is expected to deliver at least 1,800 new homes over the plan period. LP1 Policy 12, explicitly focuses the delivery of new housing to such strategic locations and encourages proposals to maximise opportunities to increase the supply of new homes by making effective use of land to optimise housing densities.

2.3.22 Emerging LP1 Policy 26 (c) and Policy 27 (c) confirms a Masterplan approach should be followed for proposals seeking to deliver industrial intensification to facilitate consolidation of SIL and support delivery of residential and other non-industrial uses on SIL designated sites.

2.3.23 Further detail of the Masterplan process elaborated in emerging LP1 Policy 30 confirms that Masterplans for SIL will be supported where they meet the following:

- A. Take a comprehensive approach and consider the whole SIL or LSIS;*
- B. Do not lead to an overall loss and seeks to provide a net increase of employment floorspace in the SIL or LSIS location unless by agreement where capacity will be consolidated elsewhere in London in line with London Plan Policy E7;*
- C. Provide uses in line with Policy 26 - Safeguarding and Managing Strategic Industrial Land (SIL) and Policy 27 - Safeguarding and Managing Change in Locally Significant Industrial Sites (LSIS);*

D. Provide upgraded facilities to be fit for purpose;

E. Take account of the particular character the area as identified in Appendix 2 'Employment Land Character and evidence base, with further guidance in the Industrial Intensification SPD;;

F. Are delivered in partnership and agreement by the Council and other stakeholders including the GLA;

G. Undertake a two-stage identification process:

i. Firstly, Sub Areas of Intensification and Consolidation; and

ii. Secondly, Sub Areas of Potential Change;

H. Deliver intensification and consolidation of sub areas; providing employment space ahead of any other development;

I. Are supported by a Viability and Delivery Plan;

J. Set out how existing businesses will be retained through a Retention and Relocation Strategy; and

K. Are supported by a Servicing Strategy'

2.3.24 LP1 emerging Policy 31 sets out specific design principles for co-location, confirming that:

'Proposals involving co-location should demonstrate:

A. High quality and innovative design approaches to create a buffer and separation between any heavy or intensive Class B2, Class E G ii and iii, or B8 employment uses and adjacent non-employment uses; and

B. Appropriate design mitigations which address the following:

i. Safety and security

ii. Layout, orientation, access, servicing and delivery arrangements of uses; including refuse

iii. Design quality, public realm, visual impact and



Figure 8 Businesses in the CEZ

amenity for residents;

iv. Vibration and noise

v. Air quality including dust, odour and emissions

vi. Agent of Change Principles.'

2.3.25 The supportive text (paragraph 9.31) also confirms – *'If the Masterplan route is followed, uses that may be appropriate for co-location alongside industrial include residential, retail, food and drink and social and community infrastructure uses'*.

2.3.26 In addition, the Council consulted (Regulation 19 Stage) on its latest iteration of the LP2 - Site Allocations Development Plan Document between November 2021 and January 2022. LP2 is intended to complement LP1 (Strategic Policies Document) and will have a key role in setting out the land use proposals applicable to the Borough's key allocated sites. LP2 will demonstrate how the Borough's growth targets (both employment and housing) can be achieved in accordance with the strategic policies of LP1 and will therefore provide a framework for determining planning applications on specific allocated sites.

2.3.27 The Blackhorse Lane SIL is allocated as 'Site SA69 – Blackhorse Lane SIL', and notes that a minimum of no net-loss of industrial floorspace, with the introduction of other uses subject to the industrial masterplan process is expected. The draft allocation is expected to be further refined based on the content of this Framework document to confirm the new proposed SIL and LSIS boundaries (as set out in the subsequent sections).

Blackhorse Lane CEZ

2.3.28 Importantly, the SIL is located within the Council's recently confirmed Creative Enterprise Zone (CEZ) designation for Blackhorse Lane (as confirmed by the Mayor of London on 30 July 2021) and as per LP1 emerging Policy 36 (which builds upon London Plan

Policy HC5 where such designations are promoted). The new policy promotes the delivery of affordable workspace, new cultural uses, improvements to existing digital infrastructure and the use of temporary buildings for 'meanwhile uses', and the delivery of creative jobs across the Zone. This designation will therefore also inform and guide the final proposed mix of uses on the hybrid application site (a full assessment of the proposals against this policy will be provided as part of the final submission).

2.3.29 The Creative Enterprise Zone (CEZs) award is one of the Mayor's flagship programmes first launched in 2017. They are defined areas where local authorities, creative industries and institutions are committed to put in place the projects, policies and support needed to preserve and grow the local creative economy and embed artists and creative SME's into local planning frameworks for the long-term.

2.3.30 CEZ's are built on the following 4 pillars which serve as the delivery planks when developing a local proposition - Space; Skills and business support; Policy; Community and consortia.

2.3.31 The Blackhorse Lane CEZ became Waltham Forest's first accredited CEZ in July 2021, after working with the GLA to design a scheme that will be rolled out to existing and aspiring CEZ's later this year. The benefits of accreditation will include planning protection and clout, due to recognition in the London and emerging LP1; status and recognition leverage for funding opportunities; opportunities to partner with the GLA on other creative, cultural and economic development programmes; access to support and advice and access to other CEZ networks and events; alongside Mayoral approval and endorsement.

2.3.32 Growth trends of creative businesses between 2014 and 2019 in Waltham Forest show the borough experienced a significant increase in creative activity, achieving 85% growth over the five-year period. While the impact of the pandemic on

the creative sector cannot be measured yet, it is anticipated the local creative supply chain will play an important role in economic recovery.

2.3.33 The Blackhorse Lane CEZ specifically will support local creatives industries to recover and re-orientate from the shocks of the pandemic. Some of the measures the Local Authority and stakeholders will consider include

- A flexible and supportive planning and business rates policy
- Dedicated funding to support industry in the CEZ area
- Targeted business and skills support where significant impact can be realised
- Foster networking and knowledge sharing between businesses and organisations, helping them to adapt, develop resilience and exploit opportunities; and
- Provide the space and infrastructure for new and innovative businesses that will emerge during the expected recession.

2.3.34 A four-year strategy and action plan will further secure the development of the CEZ in collaboration with the local creative community of businesses and residents. The framework masterplan will be a key component in helping the achieve its aspirations and goals.

Enjoy Waltham Forest

2.3.35 'Enjoy Waltham Forest' programme has delivered significant change in how people use their streets. Indicatively, where street changes have been delivered to reallocate street space for people who travel by foot or by bicycle, residents spend an extra 32 minutes per week walking, or 9 minutes cycling.

2.3.36 Enjoy Waltham Forest is a key tool for enabling a modal shift towards walking, cycling, using active travel to access public transport; and providing real time information on services. Moreover, the

programme has evidenced the importance of prioritising in new developments the need of maintaining road users away from the car, where appropriate.

Emerging Industrial Intensification SPD

2.3.37 The industrial Intensification SPD is being prepared to provide further guidance on the Council's ambitious approach to Industrial Intensification across the borough. It brings together baseline information from the Employment Land Study and Land Audit. This SPD provides additional guidance on matters covered in the Waltham Forest Local Plan (LP1 – Shaping the Borough). This document should be read in conjunction with and in the context of the relevant policies within the emerging LP1 and the London Plan. The document will help ensure that the right buildings for the right sectors are located in the correct location in the borough.

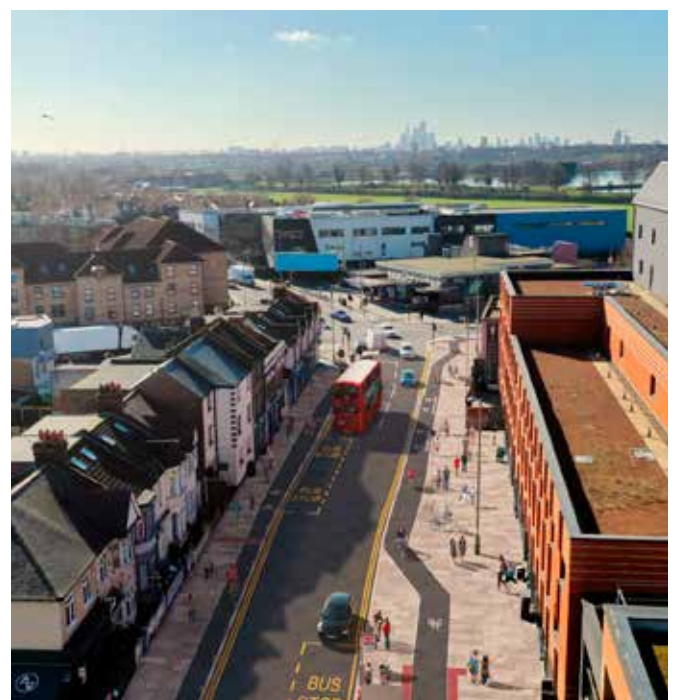


Figure 9 Enjoy Waltham Forest's proposals for Blackhorse Lane

2.4 Market context

The Role of SIL

- 2.4.1 SILs are defined by the Greater London Authority (GLA) as *'the capital's main reservoir of land for industrial, logistics and related uses'* which *'support the functioning of London's economy'* (London Plan, Policy E5).
- 2.4.2 The London Plan states that *'innovations to make more effective use of land in SILs are encouraged... This should take into account the potential to rationalise areas of SIL that are currently in non-industrial and related uses or contain transport or utilities uses which are surplus to requirements'*.
- 2.4.3 The London Plan identifies the appropriate industrial uses for SIL:
- 2.4.4 Both heavy industry and lighter industrial or industrial related uses are given merit as SIL occupiers, each contributing to London's dynamic economy. Flexible hybrid space is also recognised as important to accommodate services that support the wider London economy and its population. There is no one size fits all SIL approach and rather each SIL's merits should be considered in understanding and delivering their unique legacy.
- 2.4.5 There are 55 SILs across London. These can be grouped into five Industrial Market Areas:
- Thames Valley – 20 SILs across 1,672 ha.
 - Park Royal/Heathrow – 14 SILs across 1,152 ha.
 - Lee Valley – 8 SILs across 487 ha (in which Blackhorse Lane is located).
 - Wandle Valley – 8 SILs across 414 ha.
 - Central Services Area – 5 SILs across 172 ha.

London Plan Policy E4 (Part A)

SIL should make provision for the varied operational requirements of:

- 1) light and general industry (Use Classes B1c (now E(g)iii) and B2)
- 2) storage and logistics/distribution (Use Class B8) including 'last mile' distribution close to central London and the Northern Isle of Dogs, consolidation centres and collection points
- 3) secondary materials, waste management and aggregates
- 4) utilities infrastructure (such as energy and water)
- 5) land for sustainable transport functions including intermodal freight interchanges, rail and bus infrastructure
- 6) wholesale markets
- 7) emerging industrial-related sectors
- 8) flexible (B1c(now E(g)iii)/B2/B8) hybrid space to accommodate services that support the wider London economy and population
- 9) low-cost industrial and related space for micro, small and medium-sized enterprises (see also Policy E2 Providing suitable business space)
- 10) research and development of industrial and related products or processes (falling within Use Class B1b).

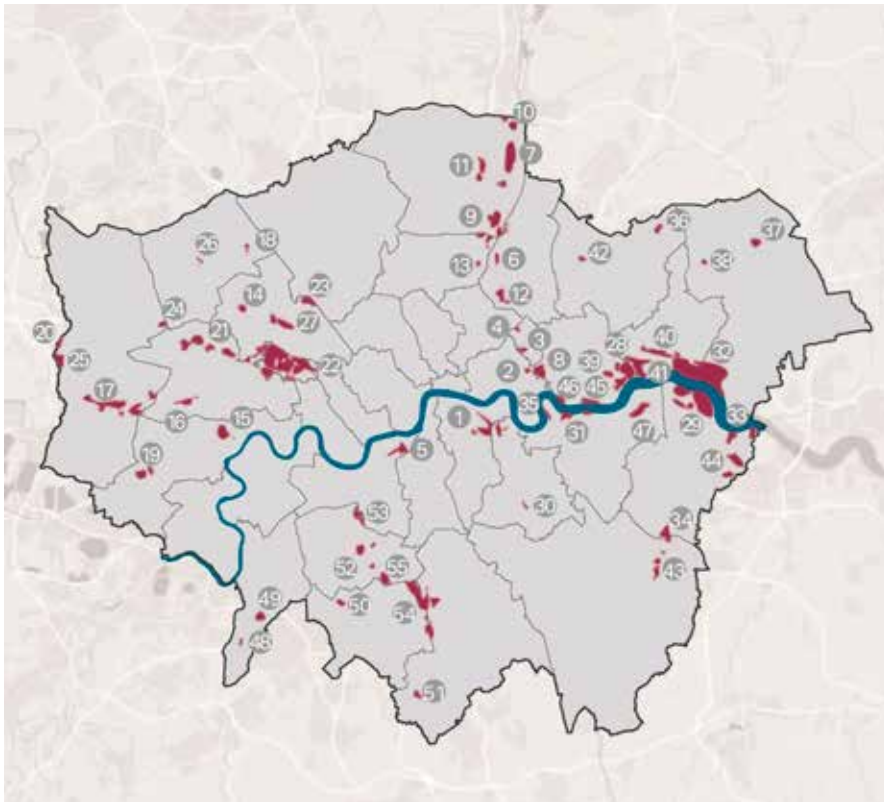


Figure 10 Strategic Industrial Locations in London including Blackhorse Lane (number 6), Source: GLA Planning

"Innovations to make more effective use of land in SILs are encouraged...This should take into account the potential to rationalise areas of SIL that are currently in non-industrial and related uses or contain transport or utilities uses which are surplus to requirements."

*London Plan
(Paragraph 6.5.3)*

2.4.6 We have carried out an assessment of all of London's SILs drawing on national data sets and a desk-based audit (see Appendix). The average SIL is large in scale at 70.9ha and half of its jobs are classed as industrial uses. The majority of SILs (43) have some form of heavy industry on site and over half (33) include a utilities function¹. This indicates a strong alignment with the policy on intended industrial role of these SILs.

2.4.7 Only 19 SILs are within 1 mile of the Strategic Road Network making them particularly suitable for logistics occupiers. In terms of the potential for modal shift, almost half of SILs (25) are in proximity to the national rail network and a lower number (20) are in proximity to water which has the potential to be used for freight.

2.4.8 SIL's were also reviewed in terms of their propensity to support diversification of commercial uses. The average SIL has a very low presence of service-orientated (footfall) uses². Twenty-two SILs (40%) are located in an Opportunity Area, though fewer are located in a Creative Enterprise Zone (8, or 15%) making this designation more unique for SILs. The average business start-up rate for the boroughs in which SILs are located is 16.0% which is in line with the average across London as a whole (15.9%).

2.4.9 The majority of SILs do not have the attributes which would suggest suitability of diversification away from economic uses altogether, with most located adjacent to other industrial or business activities (such as business or retail parks). A minority are in town centre locations and less than a third of SILs (27%) are within a Housing Zone.

2.4.10 The average SIL has a relatively low PTAL rating of 1.7, though 9 SILs have an average PTAL below 1 indicating very poor public transport accessibility. A PTAL rating of 3-6 is identified by the GLA as needed to support residential development. Park Royal and Tottenham Hale SILs are the only SILs with an average PTAL of 4 or above.

¹ There may exist smaller utilities functions which do not support employment on-site such as sub-stations

² Based on a desk-based observational audit

2.4.11 Blackhorse Lane SIL is one of 8 SIL areas in the Lee Valley Industrial Market Area. The Lee Valley, and Upper Lee Valley in particular, is a focus for industrial activity. Its categorisation as an Opportunity Area (Upper Lee Valley) in part is reflective of this role.

2.4.12 The Lee Valley has the largest number of SILs which are intersected by Opportunity Areas, Housing Zones and Creative Enterprise Zones of the Industrial Market Areas of London. The Lee Valley SILs intersect with all three designations 12 times.

2.4.13 In terms of categorising Lee Valley SILs:

- Brimsdown, British Gas Site/Cody Road, Central Leaside Business Area and Lea Bridge Gateway SILs show particularly strong characteristics supporting industrial functions;
- Blackhorse Lane, Lea Bridge Gateway and Tottenham Hale SILs demonstrate a broader economic role and contribution to the London economy than solely industrial functions; and,
- Blackhorse Lane and Tottenham Hale SIL have attributes which would particularly support introduction of non-commercial development.

³ Mayor of London (2016) Industry in the Upper Lee Valley

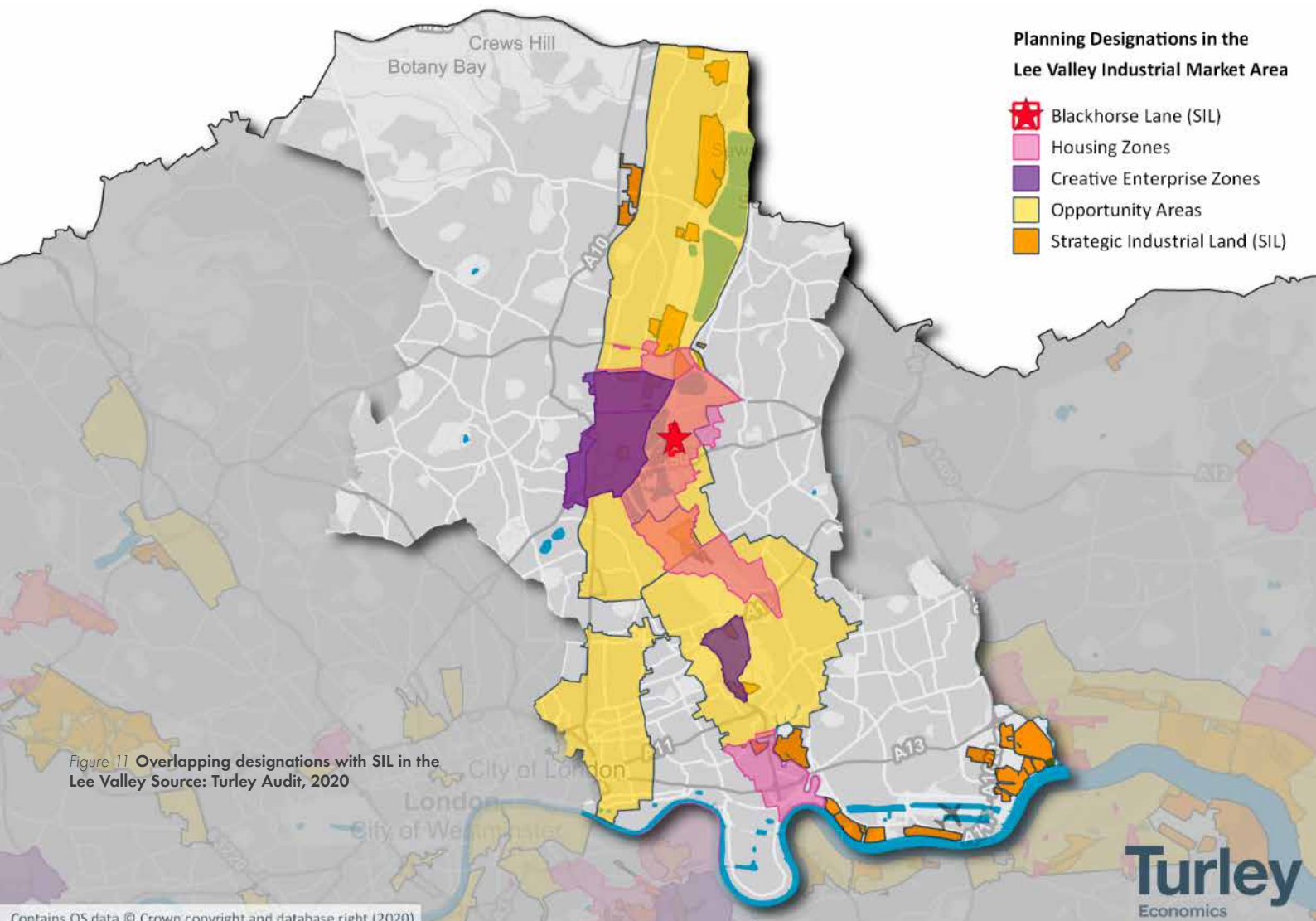


Figure 11 Overlapping designations with SIL in the Lee Valley Source: Turley Audit, 2020

2.4.14 Industrial developments across the Upper Lee Valley differ significantly in their economic role and function³. The North East of Enfield is home to large logistics and distribution uses with larger and new building stock than elsewhere in the Opportunity Area. South East Enfield is characterised by large single occupiers such as Eco-Park waste management site and Coca-Cola. Blackhorse Lane and Lea Bridge are occupied by a larger number of SMEs including a high proportion of manufacturing, artists and makers occupying older and smaller industrial stock. Tottenham is characterised by small-scale manufacturing. Therefore a 'one-size-fits-all' industrial policy is not appropriate in this context.

2.4.15 Blackhorse Lane SIL comprises just 0.4% of London's SIL land. Its current occupiers are influenced by its industrial heritage (it has above average industrial employment representation, with particular strengths in manufacturing and recorded media) and its future direction towards more creative, artisan industry. It has the second highest density per ha and third largest number of service-orientated (footfall) businesses of all SILs⁴ demonstrating diversification of traditional uses. In particular, as considered in the next section, the SIL has demonstrated organic change with the introduction of more creative artisan uses, some of which are linked to industrial functions such as food and drink manufacturing (for example, brew pubs). It has attracted uses not typically considered industrial, such as co-working space.

2.4.16 In contrast to the majority of SILs, Blackhorse Lane does not serve a utilities employment function making it distinct from the 40 SILs which do and has limited heavy industry.

2.4.17 It is one of only three SILs which benefit from the combined planning designations of Opportunity Zone (Upper Lee Valley), Housing Zone and Creative Enterprise Zone. Of these, it is the only SIL which does not benefit from proximity to rail and water for potential freight use, nor is it within particular proximity to the Strategic Road Network, being

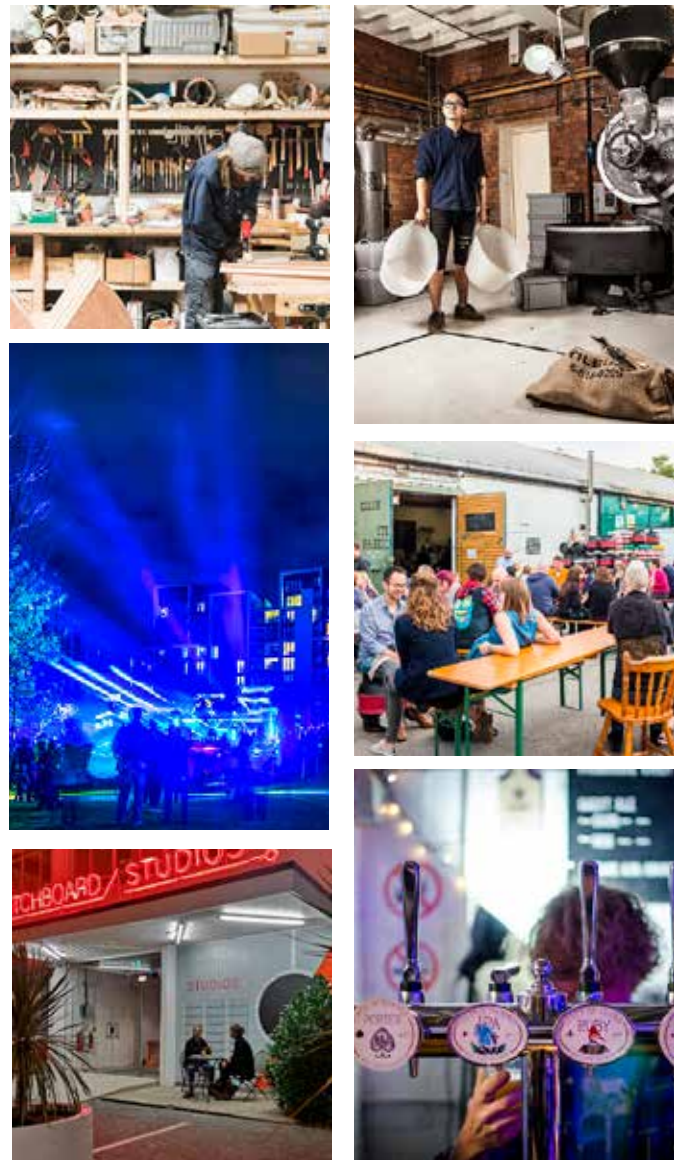


Figure 12 Businesses at Blackhorse Lane SIL

⁴ Based on a desk-based observational audit

1.8 miles away. It is within an area identified for expansion of the Blackhorse Lane neighbourhood centre to serve the area's growing population and workforce and benefits from an above average PTAL rating across the site, with areas in the south of the site having a PTAL of 3 due to the presence of Blackhorse Lane tube and rail stations. LB Waltham Forest has the highest business start-up rates of the London borough's containing SILs, demonstrating an enterprising economic context.

- 2.4.18 The Walthamstow Wetlands to the west offers a unique selling point with regards to its SSSI and Special Protection Area (SPA) value. Blackhorse Lane is one of only three SILs with such a reservoir location (and the only classed as an SPA), the others being much larger in size and with a lower propensity for non-industrial uses. Leisure access to the Wetlands provides a particular USP.
- 2.4.19 These factors combined indicate the potential to consider 'innovations to make more effective use' of the SIL, in line with Policy E5 of the Draft new London Plan. Introducing a wider range of uses, including residential, must not detract or hinder the operation of the SIL but would enhance the economic contribution it is able to make to LB Waltham Forest and London.
- 2.4.20 The need for land and space is driven by a number of factors:
- 2.4.21 Macro-economic trends – we are now operating in the digital age where traditional manufacturing in the UK has been declining for the last 30 years. While this trend has also been evident in London, it is important to recognise that the manufacturing sector is becoming more diverse as evidenced by

the growth of the 'Maker Mile' in East London⁵. Now London has more 'makerspaces' than any other part of the country, which support these types of businesses⁶. The evidence for London's Local Industrial Strategy recommends opportunities offered by R&D intensive sectors should be taken seriously and will lead to change⁷. Growth in online retail is leading to an increase in last mile requirements, with good road access along London's arterial routes.

- The operational characteristics of businesses – the shift in activities of London's businesses also gives rise to different workspace requirements. Policy E8 of the draft London Plan notes the '*evolution of London's diverse sectors should be supported, ensuring the availability of suitable workspaces including: start-up, incubation and accelerator space for micro, small and medium-sized enterprises; flexible workspace such as co-working space and serviced offices; conventional space for expanding businesses to grow or move on ; laboratory space and theatre, television and film studio capacity; and affordable workspace in defined circumstances*'.
 - The commercial value of proximity to similar businesses, its supply chain and residents – there is a desire to be close to others operating in similar fields to benefit from the 'bump effect' of knowledge exchange and labour resource, as well as proximity to residents for footfall where businesses have a service-orientated offer.
- 2.4.22 Since the latest data release a number of businesses have moved to or opened up on the site including Switchboard Studios offering 26 co-working studios for over 80 people, Truman brewery, All Plants (vegan food manufacturers), Square Mile Roasters

⁵ <http://makermile.cc/> Collective of 12 creative studios, mini factories and open workshops, which are dotted around Mare Street and bordering Tower Hamlets and Hackney.

⁶ Nesta (2015) Open dataset of UK makerspaces

⁷ GLA Economics (Aug 2019) Developing the evidence base for London's Local Industrial Strategy

⁸ SIL geography defined as Waltham Forest LSOAs 014C and 014E.

⁹ Business Register and Employment Survey, 2018

¹⁰ CoStar

¹¹ Data provided by Blackrock for Uplands up to November 2019

(coffee roastery) and Minor Figures (cold-brew coffee producers). Those taking up business space reflect the increasing diversity of London's economy and the growth in artisan manufacturing. This is similarly reflected in the designation of Blackhorse Lane as a 'Creative Enterprise Zone'.

2013, particularly reflecting the scale of the Warren Evans unit, suggesting that this kind of space is less fit for purpose and orientated to the wrong market. The role of East London¹² is a useful starting point in understanding the direction of travel for Blackhorse Lane SIL.

2.4.23 The majority of lease transactions¹⁰ and recent enquiries¹¹ have been for space below 1,000 sqm. The Industrial Land Audit conducted in 2019 (see Appendix) found that the 7,000 sqm unit previously occupied by Warren Evans remains vacant. Since production of the Audit space in this unit has begun to be let in smaller sub-divisions to better reflect market demand. The quantum of available floorspace on the SIL has increased to its highest level since

2.4.24 Winning the bid to host the 2012 Olympic Games was a turning point for the eastern boroughs.

2.4.25 Since 2009 the number of jobs in East London has grown by 34% (266,000 additional employee jobs) compared to 25% growth across London as a whole.

2.4.26 East London has become a focus for companies which would typically occupy co-working spaces,

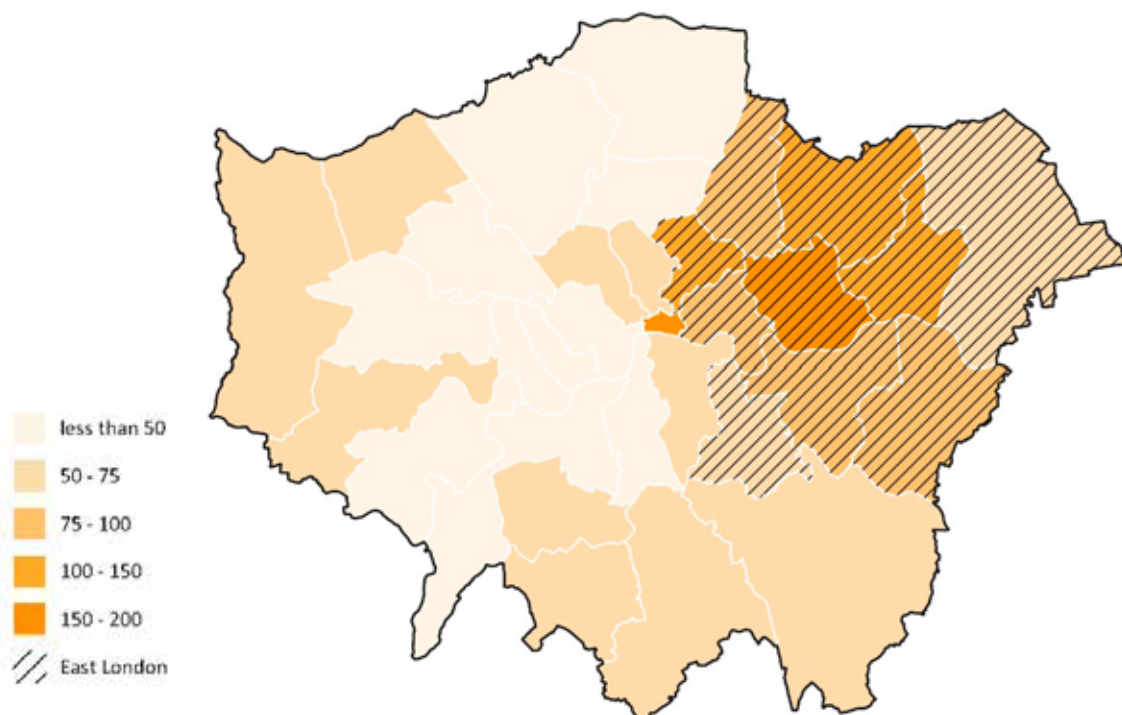


Figure 13 Percentage change in number of micro businesses in open workspace sectors, 2010-2018, Source: UK Business Counts Data, 2019



Figure 15 Businesses at Blackhorse Lane SIL

incubators, accelerators, artists' studios and makerspaces (jointly termed 'open workspace' by the GLA¹³). These businesses tend to be micro (0-9 employees)¹⁴ and in sectors such as publishing, programming and broadcasting, video production, creative and arts businesses. Over the last eight years micro business in the East of London operating in sectors which typically use open workspace have grown at a faster rate than the London average.

2.4.28 As a result of these changes (as well as the changes in supply and demand previously mentioned) Blackhorse Lane SIL now demonstrates an eclectic mix of business uses, particularly traditional manufacturing businesses which have evolved to include customer facing, service-orientated elements. This includes Signature Brewery, which hosts the Stow Film Lounge (pop-up cinema), Exhale Brewery, Wildcard Brewery and Yonder co-working space, climbing wall and yoga loft.

2.4.27 Whilst manufacturing employment as a whole has decreased in East London (-14%), employment in industries typically associated with more flexible and hybrid space such as 'open workspaces' have seen proportionate increases (c.80%) in both East London and Waltham Forest.

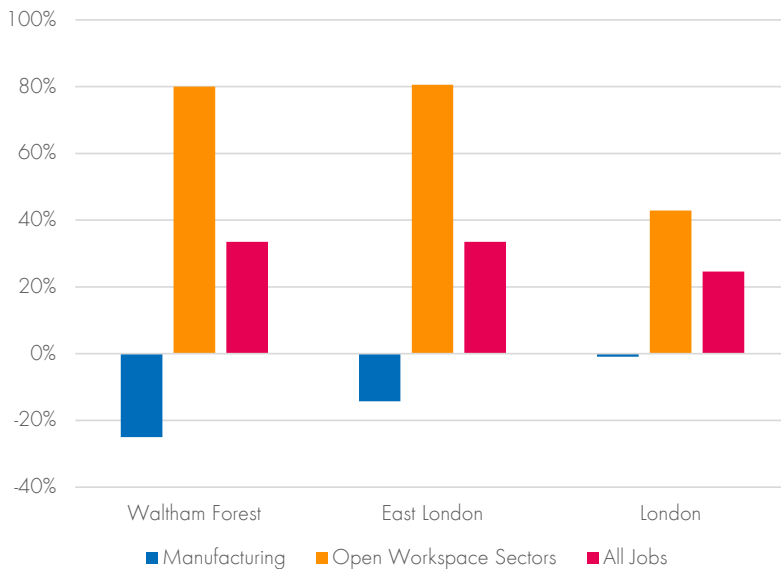


Figure 14 Percentage change in employment by selected sector types, 2009 - 2018, Source: ONS via Nomis, BRES 2009-2018

¹²London Plan sub region, which includes: East London includes: Barking and Dagenham, Bexley, Greenwich, Hackney, Havering, Lewisham, Newham, Redbridge, Tower Hamlets, Waltham Forest

¹³IPPR (2016) Start me up: The value of workspaces for small businesses, entrepreneurs and artists in London

¹⁴IPPR (2016) Start me up: The value of workspaces for small businesses, entrepreneurs and artists in London; verified through UK Business Count Data (2018)

¹⁵ <https://www.london.gov.uk/what-we-do/arts-and-culture/culture-and-good-growth/creative-enterprise-zones>

2.5 Key market analysis conclusions

2.5.1 In summary, Blackhorse Lane has responded to changes in market demand by sector over time. This has led to organic growth and change. In recent years, this has resulted in traditional manufacturing occupiers diversifying to include a service orientated offer. Such uses both create and require a more vibrant setting which attracts both employees and customers.

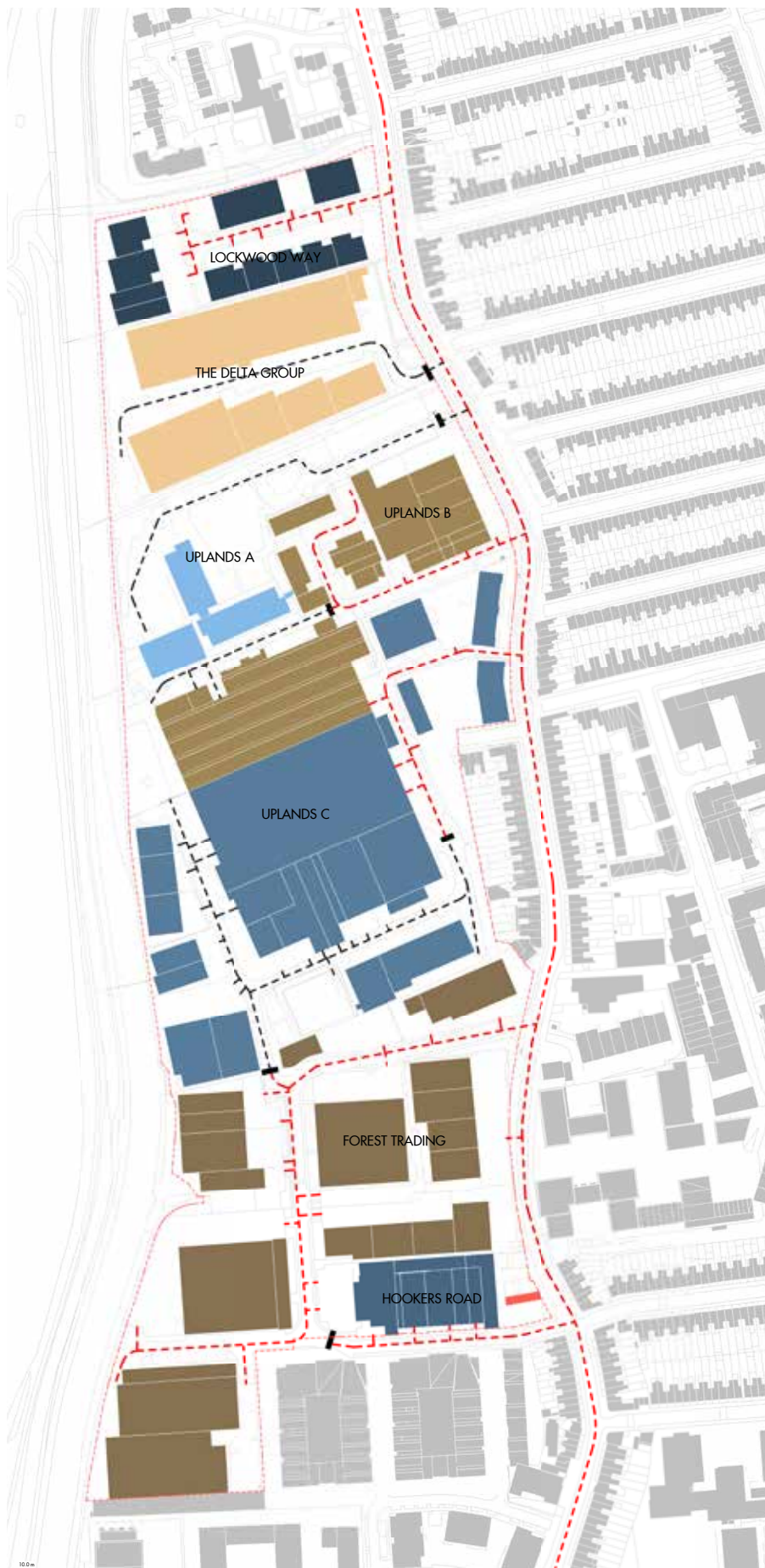
2.5.2 In order for Blackhorse Lane to support continued organic business growth as well as to retain traditional industrial uses it needs to:

- Have flexibility in the size and use class of its business units to respond to market demand;
- Improve the quality of business units and surrounds to remain competitive with other locations;
- Support local footfall to the increasing number of companies on site who are diversifying to include service-orientated options;
- Improve access for pedestrians/cyclists to encourage a shift to more sustainable modes of transport;
- Upgrade infrastructure and digital connectivity to enable businesses to operate effectively within the modern economy;
- Enhance public realm and integration into wider neighbourhood to retain and attract staff who desire to work in a vibrant, creative, mixed use neighbourhood.
- Support the growth of designated Blackhorse Lane Creative Enterprise Zone (CEZ) and its businesses (including within the both traditional and modern manufacturing, and wider industrial and creative/ cultural uses within Class B2, B8 and Class E) in line with the objectives of LP1 Policy 38

2.5.3 Without action Blackhorse Lane SIL will likely come forward as a building by building upgrade. The environment created in this instance bears comparison with the existing estate and would provide limited additional capacity. This form of development means it is unlikely to deliver improvements to the site or wider area, such as: improvements to the public realm; improvements to the efficiency of the site layout and street network; upgrades to infrastructure and digital connectivity; nor enable the reintegration of the area into the wider neighbourhood.



Figure 16 Businesses at Blackhorse Lane SIL



VEHICLE ACCESS - MANAGEMENT SITES

- Lockwood Way
- The Delta Group
- Uplands A
- Uplands B
- Uplands C
- Forest Estate
- Hookers Road
- Infrastructure

- - - External vehicle path
- - - Private vehicle path
- █ Gate

Figure 17 Movement and access

2.6 Movement context

Site movement, servicing and access

- 2.6.1 The existing roads within the site include Priestly Way, Hookers Road, Lockwood Way and a number of unnamed internal roads. These are wide enough to accommodate articulated vehicles to service the industrial units. The existing radii on junctions onto Blackhorse Road are sufficient for the use of articulated vehicles, providing appropriate visibility splays for drivers. The nearest Strategic Road Network is the North Circular (A406) accessed via Blackhorse Lane to the north which is the predominant route for heavy goods vehicles. However this is 1.8 miles away which does not make it particularly appealing to logistics operators who favour immediate proximity to arterial routes. Furthermore, the immediately adjacent access roads are lined by Victorian terraced houses and therefore not ideal for high frequency HGV movements.
- 2.6.2 The north of the SIL (Lockwood Way, Delta Group, Eden Girls' School and to some degree Uplands A) is arranged as discrete industrial estates, each with its own access route off of Blackhorse Lane. These tend to be simple T-shaped cul-de-sac of roads, providing direct access. Improvements could potentially be made by creating a north-south connection between these routes, creating a loop for safer and more efficient large vehicle access.
- 2.6.3 The street network in the south of the SIL is more complicated and convoluted. Priestly Way winds through the site, creating a number of pinch points and sub-optimal conditions for larger vehicles. Access is not intuitive. For example, Hookers Way connects to Blackhorse Lane and could provide direct access to the south of Forest Trading Estate but is gated, requiring drivers to enter the site from the north and travel south through the SIL. If the site were to be redeveloped, there is potential to improve vehicular access through establishing a more connected street pattern.
- 2.6.4 In terms of pedestrian access to the SIL, whilst footways are provided, they are considered to be below design standards. The existing pedestrian routes used to access Blackhorse Road underground station and the local bus routes on A503 Forest Road would be undertaken via Blackhorse Lane, or walking through the internal roads between the industrial units. Pedestrians are more likely to use the route on Blackhorse Lane where there is more formal and informal surveillance, particularly in the evenings.
- 2.6.5 The existing internal roads are not considered to be cycle friendly and there is no visible cycle parking provided on site. There is an existing cycle route on Blackhorse Lane which connects into Waltham Forest's wider cycle network. This network has seen significant recent investment as part of the Enjoy Waltham Forest Programme. Integrating basic cycle infrastructure on site would enable staff and customers to comfortably access the SIL via sustainable transport.

Parking

- 2.6.6 The SIL's on-street parking arrangements have private restrictions in place while other areas are unrestricted with cars using any other areas of hardstanding as unmarked bays. The area surrounding the SIL is largely included within a Controlled Parking Zone (CPZ) restricting parking to permit holder. This may be resulting in more people using the SIL to park their vehicles.

Other transport infrastructure

- 2.6.7 The SIL does not benefit from any existing commercial water access (eg Wharves), railway connectivity (eg rail heads) or other intermodal facility and is therefore wholly reliant on the road network.

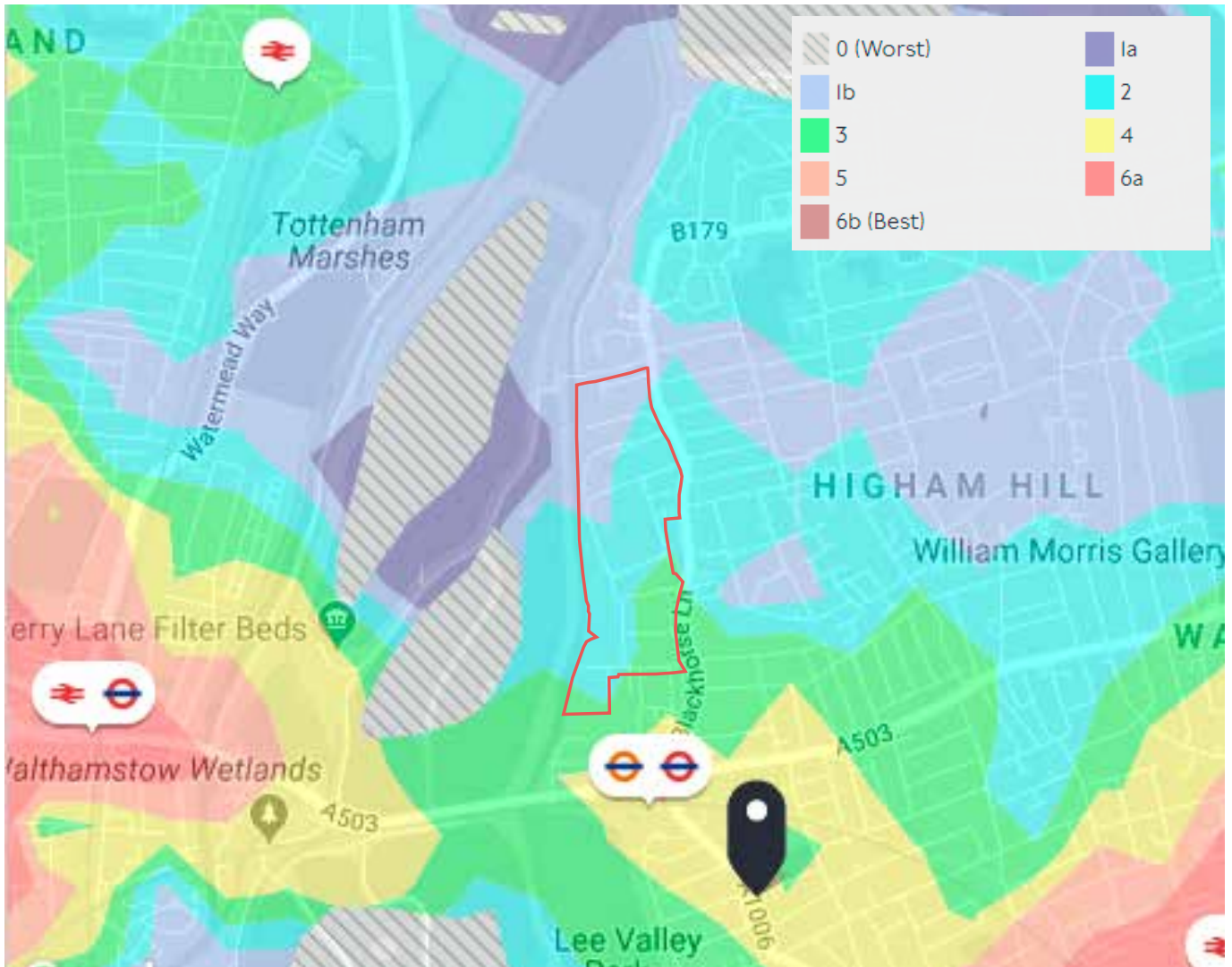


Figure 18 Public transport accessibility levels

Public Transport

- 2.6.8 Access to public transport varies across the SIL with central and southern parts well served by local bus routes and Blackhorse Road Station. The Public Transport Accessibility levels (PTAL) ranges from 3 in the south to 1b in the north as illustrated in Figure 25. This could improve through the introduction of a better street network.
- 2.6.9 The SIL is within approximately 5-15 minutes' walk from Blackhorse Road underground and overground stations which provides access to the Victoria and Overground Line with trains departing regularly during peak hours. The SIL is also a 20-30 minute walk from St James Street Overground Station which is further south on Blackhorse Lane. The SIL is within a short walk of the 158 bus services on Blackhorse Lane, which has a high frequency of service, every 5-7 minutes.

Pedestrian and cycle accessibility

- 2.6.10 While the existing SIL provides limited pedestrian and cycling accessibility, the Blackhorse Lane area is served by well-established walking and cycling routes. In terms of local pedestrian accessibility, there is a well-established walking route along the River Lee Navigation running from Waltham Abbey to East India Dock.
- 2.6.11 In terms of local cycle accessibility, Quietway 2 runs to the south on Coppermill Lane and leads to Clerkenwell in central London, Cycle Superhighway 1 runs to the west along the A10 and leads into Shoreditch in central London.
- 2.6.12 The Enjoy Waltham Forest scheme has delivered significant change in how people use their streets in the area. Indicatively, where street changes have been delivered to reallocate street space for people who travel by foot or by bicycle, residents spend an extra 32 minutes per week walking, or 9 minutes a cycling.
- 2.6.13 A map of the walking and cycling routes within Waltham Forest borough are illustrated in Figure 33.



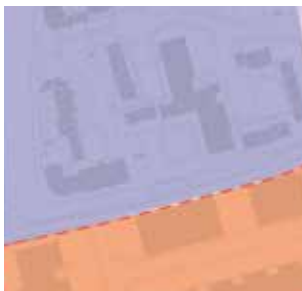
Figure 19 Waltham Forest's cycling network



Figure 20 Character areas

2.7 Environment and urban context

2.7.1 The Blackhorse Lane area's character is diverse, contrasting and ever-changing. To assist our understanding, the area can be considered through character areas. The boundaries are not definitive but have been drawn up on the basis of predominant land use, ownership, building type and appearance, urban grain, streetscape and historical associations.



Existing homes - suburban terrace

A low density residential neighbourhood, with two storey terraced homes arranged in blocks of four. The houses are cottage-like in their proportions and more modest in detailing and materiality compared to the nearby Victorian/Edwardian streets.



The streets are laid out in radial geometric forms, creating quiet cul-de-sacs, as well as some awkwardly shaped blocks and leftover spaces.



This residential neighbourhood turns its back on the Blackhorse Lane SIL area and is separated by the footpath access to Walthamstow Wetlands.



Lockwood Way

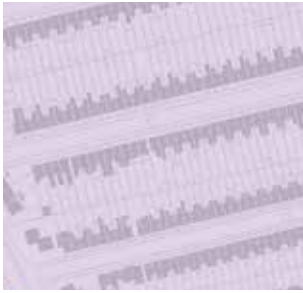
A small estate for light industry comprised of single storey 1960s warehouses. The buildings are simple, brick sheds with corrugated metal panelling, flat roofs and roller shutters.



Buildings are arranged linearly along both sides of a dead-end access road. Most are smaller units with two larger buildings. There is no frontage onto Blackhorse Lane.



The public realm consists of an area of hardstanding between the street and building line which is used flexibly by different businesses including for parking, loading, product display, storage, public seating.



Existing homes - terraced

Houses are tightly arranged in terraces along the residential streets with back gardens backing onto one another, creating a regular grid.



The area is mostly Victorian and Edwardian terraces, with some more recent additions which follow the same pattern. The street character is strong and coherent due to the consistency and rhythm of the architecture. Streets are generally dominated by on-street parking on both sides of the road.



The area is primarily residential, though also has local amenities such as schools and parks, as well as shops along the south of Blackhorse Lane.



Sutherland Road

The modern urban typology (deep in plan, medium rise and delivers high density homes) has been incorporated as infill development between existing industrial and residential buildings.



Working within the constraints of the existing block structure and respecting neighbouring buildings has meant a more varied approach to the design of new homes. The buildings follow a less rigid rectilinear blocks and integrate houses and stacked maisonettes to provide more gentle transitions of scale.



The integration of different uses and building types make for animated and interesting streetscapes.



New high density housing

This area delivers high density homes as blocks of flats, which are deep in plan and medium rise. The character of the area is still evolving as it continues to be developed.



Perimeter blocks create simple streets and spaces which are generally well over-looked by balconies and streets have on-street parking. Though the animation and activity that multiple buildings and uses generate is lost. And there are parts of the ground floor which have an inactive/blank facade.



The area is primarily residential, with some shops at ground floor, nearer to the station.



Walthamstow Wetlands

The Walthamstow Wetlands are reservoirs for Thames Water which have recently been restored and opened as a nature reserve.



The landscape consists of large reservoirs, grasslands and footpaths, with some areas of tree cover. The area is relatively flat, with few obstructions, allowing for open, expansive views. The wetlands offer a break from the urban environment and act as a breathing space between Tottenham and Walthamstow.



At the moment, a fence line and levels restrict access and views from Blackhorse Lane SIL at ground level.



Delta Group

A more modern, planned provision of industrial space. The Delta Group area consists of linear rows of single-storey, double-height warehouses along both sides of an access route. The buildings are newer and in good condition compared to surrounding areas. They are metal-clad with areas of glazing. The street is wide with perpendicular parking and yard space at the end.



The buildings are set back from Blackhorse Lane, separated by a fence line and at a different level, giving the sub-area a private and enclosed feel.



Uplands

Uplands is a business park for light industry, which is also home to a mix of other commercial and creative uses. For the most part, the site is made up of single-storey double-height warehouses. But buildings vary greatly in size, type, materiality and condition; a symptom of the fact that it has evolved gradually over time.



Notably, the large warehouses have been sub-divided into many smaller units. The result is a street pattern and grain which is not reflective of the activity on site. The public realm environment varies across the area, with unconventional access arrangements.



Eden Girls' School

Eden Girls' School is distinct, being a school surrounded by industry.

The school consists of three storey 1960/70s office blocks with a flat roof and repetitive windows along horizontal bands. The buildings are concrete, with pink, purple and blue panelling.



The school space is enclosed and gated, and does not address the street or surrounding area. It contains parking, lawns and sports areas. It generally feels removed from its context.



Forest Estate

An industrial area of double-height warehouses, some with two-storey office buildings attached.

Buildings are larger and sit loosely in space, often not facing on to the streets. Access arrangements are unconventional, and areas of private access make the area less permeable. Notably, there is a significant amount of planting, softening the feel of the public realm along Priestly Way.



The relationship to the area to the south is changing, as high density residential developments come forward. While the estate is generally inward looking, one row of buildings do provide frontage on to Blackhorse Lane, but are set back from the street.



2.8 Development context

2.7.2 It is clear from the current development pipeline in Blackhorse Lane that the area is undergoing significant change. The following seven sites are all located in close proximity to the Blackhorse Lane SIL and will introduce multiple high density buildings with a range of residential, employment, commercial and community uses proposed (the old use class order is referred to below in line with the stated descriptions of development for each permission).

Site 1: Mandora Site

2.7.3 Planning permission (ref. 2013/0554) was granted in 2014 for approximately 519 student beds and up to 484 residential units for the site known as Mandora Site comprising land at 3, 5 and 7, Blackhorse Lane land to south of Hookers Road, west of Blackhorse Lane. The approved buildings vary between 3 and 8 storeys in height, with the final phase due to complete shortly. The site is not within the Blackhorse Lane SIL, but is part of the site referred to as 'Blackhorse Road station hub and waterfront' in the Upper Lea Valley OAPF and Blackhorse Lane AAP, and is allocated as an opportunity for uses including new homes, commercial space, leisure and retail.

Site 2: Blackhorse Mills

2.7.4 In August 2017, planning permission was granted for the redevelopment of this industrial site to the north of Forest Road adjacent to the water, to the west of Blackhorse Lane and the station. The redevelopment comprised 440 residential units and 2,069sqm of flexible commercial space ranging from 2 to 16 storeys with associated works (Ref: 161705). The site is also located within the Blackhorse Lane AAP area. In 2018 an amendment application was approved which increased the number of dwellings to 479, an outdoor swimming pool as well as other minor amendments (Ref: 173525). The development has now been completed and is being occupied.

Site 3: Forest Works

2.7.5 Planning permission was granted October 2017 for the demolition of industrial/warehouse units and redevelopment comprising 337 residential units and 1,750sqm of commercial floorspace, 19 car parking space and hard and soft landscaping and access roads (Ref: 170893). Heights were granted between 2 and 10 storeys. The site is also located within Blackhorse Lane AAP and is included within a specific opportunity site, 'Station Hub and Waterfront'.

Site 4: Blackhorse Point

2.7.6 Planning Permission (Ref. 182917) was granted in December 2018 for the redevelopment of the existing NCP Carpark adjacent to Blackhorse Road Station involving demolition of existing structures and the construction of a building ranging from 5 to 21 storeys in height comprising 350 residential units (Use Class C3) approximately 1,650 sqm of flexible commercial floor space (Use Class A1 to A4, B1, D1 or D2), community cycle hub, ancillary refuse stores, servicing, parking, landscaping and associated public realm works. The development is now under construction.

Site 5: Blackhorse Yard

2.7.7 A planning permission (ref. 183424) was granted 4th March 2021 for the comprehensive redevelopment of the site to provide a series of buildings ranging in height from 1 to 15 storeys to provide 359 new affordable homes in a mix of one, two and three bedroom units (Use Class C3) 2,569sqm of non-residential floor space comprising of 720sqm of flexible floor space (Use Class A1 and/or A2 and/or A3 and/or A4 and /or B1 and /or D1 and/or D2), 532sqm of flexible floor space (Use Class B1 and/or D1) and 1,313sqm of floors pace (Use Class B1), car parking, cycle parking, landscaping, highways and utilities works. The site is allocated as a Borough Employment Area. But is also part of the Sutherland Road allocation for mixed-use redevelopment in the Upper Lea Valley OAPF.