

20/01/2023

Delivered by email

Ms Andrea Copsey
Programme Officer
(on behalf of Inspectors Mrs S Housden BA (Hons) BPI MRTPI &
Mrs C Jack BSc (Hons) MA MA (TP) MRTPI)

Dear Ms Copsey,

REPRESENTATIONS TO WALTHAM FOREST DRAFT LOCAL PLAN (LP1) EXAMINATION STAGE 2

We write on behalf of our clients, BlackRock and NEAT Developments, with respect to the Inspectors' Further Matters, Issues and Questions Consultation on the London Borough of Waltham Forest's ("*LBWF*"; "*the Council*") Draft Local Plan Part 1 (LP1 - Strategic Policies), which is now at Examination Stage 2 of the Development Plan Process. The Draft Local Plan also encompasses Part 2 (LP2 - Draft Site Allocations), which is currently at the Regulation 19 Stage of the Development Plan Process but does not form part of this consultation process (our client reserves the right to comment further on LP2 at a separate public consultation in due course).

These written representations address matters which are considered to be of relevance to the land at the Blackhorse Lane Strategic Industrial Location (SIL) known as Uplands Business Park and Forest Trading Estate ("*the site*"). Our client has a vested interest in this site, and in August 2022 – following extensive collaboration with LBWF, the GLA and other key stakeholders – submitted a hybrid planning application (LPA ref. 222739) for the comprehensive redevelopment of the site. Specifically, hybrid planning permission is sought for the following development:

"HYBRID PLANNING APPLICATION for the phased demolition of all existing buildings and structures (excluding Uplands House), site preparation works, and comprehensive industrial-led mixed-use redevelopment of parts of UPLANDS BUSINESS PARK AND FOREST TRADING ESTATE, BLACKHORSE LANE, WALTHAM FOREST, LONDON, comprising:

DETAILED planning application for the construction of one 3 storey building and one 4 storey building (Blocks A1 and A2) comprising 17,636 sqm (GEA) of flexible industrial floorspace (Use Classes B2, B8, and E(g)(ii and iii)) and one mixed-use 18 storey building (Block B) comprising 119 residential dwellings (Use Class C3) and 540 sqm (GEA) of flexible industrial floorspace (Use Classes B2, B8, and E(g)(ii and iii)), as well as ancillary yard areas; car/cycle parking; amenity; plant; public, communal, and private realm; soft/hard landscaping; infrastructure, access, and highway works; and other associated works; and

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OUTLINE planning application (with all matters reserved) for the construction of up to eight development plots (with maximum building heights of up to 22.6 m A.O.D. (Plot C), up to 145.0 m A.O.D. (Plots D and H), up to 110.2 m A.O.D (Plots E and J), up to 72.4m A.O.D. (Plot F), up to 51.0 m A.O.D. (Plot G), and up to 40.5 m A.O.D. (Plot K)) comprising up to 167,398sqm (GEA) residential floorspace (Use Class C3), up to 14,824 sqm (GEA) of flexible industrial floorspace (Use Classes B2, B8, and E(g)(ii and iii)), and up to 5,000 sqm (GEA) of Classes E and F and Sui Generis (Drinking Establishment/Bar) floorspace, as well as ancillary yard areas; car/cycle parking; amenity; plant; public, communal, and private realm; soft/hard landscaping; infrastructure, access, and highway works; and other associated works.”

The Proposed Development seeks to deliver intensified, high quality, modern industrial floorspace, whilst also providing a mix of residential, commercial, retail, community and leisure uses. The proposals seek to focus a large proportion of the modern intensified industrial uses within a consolidated parcel to the north of the site, whilst introducing a broader mix of co-located industrial and non-industrial uses to the south. This follows the aspirations of the wider Blackhorse Lane SIL Masterplan Framework (2022), which sets out a coordinated vision, objectives, and principles for the redevelopment of the wider Blackhorse Lane area. The Blackhorse Lane SIL Masterplan Framework is intended to provide guidance for the future development of the SIL and has been prepared in line with the requirements of the London Plan and emerging Local Plan. The application site forms part of the Central Sub-area identified in the Blackhorse Lane SIL Masterplan Framework, a detailed strategy for this sub-area is currently being prepared in collaboration with LBWF, other landowners and the GLA as a consultee.

In strategic terms, our clients’ application is intended to serve as the anchor for the wider evolution of the Blackhorse Lane area and – following its designation by the Mayor of London in 2021 – the emerging Blackhorse Lane Creative Enterprise Zone (CEZ).

The remainder of this letter sets out our response on behalf of our client to the questions that have been raised by the Panel of Inspectors in their Further Matters, Issues and Questions Paper issued on 5th December 2022, in particular those that concern our client’s site. We provide written responses to the following questions in this letter:

- Matter 2: Vision, Strategic Objectives, Sustainable Development and Scale of Growth – Question 2.3
- Matter 3: Housing Land Supply and Boroughwide Policies – Question 3.1
- Matter 4: Employment and the Vitality and Viability of Centres – Questions 4.1 and 4.2
- Matter 6: Built Environment, Heritage and Design – Question 6.3

Where it is required, commentary is provided on the soundness of the relevant Draft Local Plan policies. Our consideration of soundness is based on the criteria set out in **Paragraph 35** of the National Planning Policy Framework (NPPF, 2021), which establishes that:

“Local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are ‘sound’ if they are:

(a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

(b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

(c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

(d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.”

Overall, our client remains strongly supportive of the Draft Local Plan, which is considered to positively plan for the growth needs and opportunities of the Borough and address the requirements of the London Plan (2021).

We wish to reserve the right to participate (where necessary) in the Matter 2, 3, 4 and 6 hearing sessions taking place between 7th and 9th March 2023.

MATTER 2: VISION, STRATEGIC OBJECTIVES, SUSTAINABLE DEVELOPMENT AND SCALE OF GROWTH

2.3 The Topic Paper (LPE30 pages 21-22) sets out further changes to the proposed distribution of housing growth in the Plan’s Policies 4, 9, 10 and 11. Are these changes justified and in general conformity with the London Plan?

Yes, with respect to the broad growth assumptions set for the Central Waltham Forest Area (CWFA) and, more specifically, the Blackhorse Lane Strategic Location. The Topic Paper notes that the housing contribution for the Central Waltham Forest area described in Draft Local Plan Policy 10 (Central Waltham Forest) has been updated, resulting in a need to further modify the distribution of housing set out in the policy. Accordingly, a modification is proposed to revise upwards the overall Central Area housing target from 7,600 to 8,700 units. To ensure this higher target is deliverable, the modification seeks to revise upwards the housing targets for a number of Strategic Locations. This includes the Blackhorse Lane Strategic Location, which is now expected to deliver a total of 3,090 units (increased from 1,800 units).

With respect to the precise sources of housing growth, **Paragraph 3.1.2.5** of the Topic Paper notes that “[m]ost of the delivery capacity will come from large sites with extant detailed permissions. Other components of the supply include small sites with planning permission, proposed site allocation sites and other emerging large sites with evidence of deliverability.” [our emphasis]

Our client’s site, Uplands Business Park and Forest Trading Estate – which is located within the Blackhorse Lane Strategic Location – forms part of Site Allocation ‘SA69’ as identified within the Draft Local Plan LP2 ‘Site Allocations’ document. The allocation is identified in the Draft Local Plan LP2 document as having capacity for up to 81,000 sqm of industrial capacity and 2,300 new homes. The designation seeks, *inter alia*, to:

- Optimise site capacity and deliver industrial floorspace with an ‘industry first’ approach; and
- Explore the potential for co-location of other uses such as residential, community, retail and commercial uses.

Listed as a “*relevant document*” in **Paragraph 3.1.3** of the Topic Paper is the Council’s 5 Year Housing Land Supply Statement. With respect to the net capacity (residential units) for Site Allocation SA69, the Statement notes that “[t]he phasing for the site has changed and capacity has increased from 2,300 to 2,850.”

Also listed as a “*relevant document*” in **Paragraph 3.1.3** is the Blackhorse Lane SIL Masterplan Framework, which has been developed by the Council in collaboration with the GLA, our client, and other landowners, in accordance with the two-stage Masterplan process set out in the GLA’s Draft Practice Note - Industrial Intensification and Co-Location through Plan-led and Masterplan Approaches (2018) and supported by London Plan Policy E7 (Industrial intensification, co-location and substitution) and Draft LP1 Policy 30 (Industrial Masterplan Approach). As is

discussed in further detail below, the Framework will facilitate the release of a portion of the Blackhorse Lane SIL (including a parcel of our Client's site) and its re-designation as LSIS to deliver industrial intensification and mixed-use development, including the delivery of the residential units referred to in Draft LP2 Site Allocation SA69 above.

As noted above, our client has submitted a hybrid planning application for the site and is working with the Council to secure determination later this year (2023). The proposals which are the subject of this application have been closely informed by the Blackhorse Lane SIL Masterplan Framework, and will provide up to 1,800 of the residential units, thereby making a significant contribution to the targeted growth in Blackhorse Lane Strategic Location. This will provide a reliable source of housing growth over the Plan period equivalent to 100% of the un-modified housing target for the Strategic Location, or 58% of the modified housing target. Given the ample space for future development within the Strategic Location – and the detailed guidance for the intensification of the Blackhorse Lane SIL set out in the Masterplan Framework – the modified housing target for the Strategic Location is considered to be readily achievable, justified by the evidence, and to conform with the London Plan.

In summary, therefore, the further changes to the proposed distribution of housing growth set out in Policy 10 – particularly as they affect the Blackhorse Lane Strategic Location – are considered to be positively prepared, justified and effective in accordance with Paragraph 35 of the NPPF and in conformity with the London Plan.

MATTER 3: HOUSING LAND SUPPLY AND BOROUGH WIDE HOUSING POLICIES

3.1 (e) Are the expected lead-in times, dates for first completions, rates of development (dwellings per year), and net site capacities realistic for the sites included in the 5 Year Housing Land Supply Statement (LPE32)? Including for the following sites:

ix. Blackhorse Lane (SIL 3)

Yes. BlackRock and NEAT Developments have extensive experience in bringing forward complex brownfield sites for sustainable, high-density mixed-use re-development.

Our client is committed to bringing the site forward for development, and to that end submitted a planning application for its comprehensive re-development in August 2022 and is working with the Council to secure determination later this year (2023). The application is hybrid in format: Phase 1 (119 units) – for which detailed plans have been submitted – is due to complete in 2027, while Phase 2 (up to 1,681 units) – the outline element – is set to be delivered in separate sub-phases over the period to 2035. New homes could, therefore, be ready for occupation on our client's site during the 2027/28 monitoring year if the development management process facilitates a swift decision, and an early commencement on site can be achieved.

The 5-Year Housing Land Supply Statement (2022) establishes a net capacity target of 2,850 units for the Blackhorse Lane SIL over the period to 2037-38 which is welcomed. The planning application recently submitted by our client – which provides for the delivery of up to 1,800 new homes – would deliver the majority of these units, and therefore underpins the net capacity target set out in the 5-Year Housing Land Supply Statement.

Crucially, our client's site will deliver much-needed homes within the next five years and beyond, and represents a significant component of the Council's future housing land supply. The Draft Local Plan (LP1 Policy 2 – Scale of Growth) commits the Borough to delivering a total of 27,000 homes over the 15-year plan period (2020-2035), or approximately 1,800 homes per annum. The application provides for the delivery of up to 1,800 new homes and would, therefore, make a substantial contribution equivalent to approximately 100% of the annual requirement set out in the Draft Local Plan.

With respect to the wider Blackhorse Lane Strategic Location, the Masterplan-led re-designation of part of the SIL to LSIS represents a practical, realistic and optimised site solution to support the delivery of high-quality homes in a

sustainable location. The Blackhorse Lane SIL Masterplan Framework provides sufficient flexibility to enable a range of possible permutations of development to come forward, and enables individual application sites to be delivered in a variety of different orders (or, indeed, alongside one another). This will ensure that a reliable pipeline of units (alongside new high-quality industrial floorspace) can be maintained and delivered within the wider (former) SIL over the Plan period.

Our client has collaborated extensively with the Council, GLA and local stakeholders throughout the preparation of the Blackhorse Lane SIL Masterplan Framework and, indeed, at the pre-application stage of their own hybrid planning application, and they fully intend to continue working closely with the Council to deliver new homes within Blackhorse Lane.

In summary, therefore, the expected lead-in times, dates for first completions, rates of development (dwellings per year), and net site capacities realistic for the Blackhorse Lane SIL – Site 11 in the 5-Year Housing Land Supply Statement – are considered to be realistic and, critically, deliverable. In the context of Blackhorse Lane, therefore, we consider the Draft Local Plan to be positively prepared, justified, effective and consistent with national-level policy with respect to its 5-Year Housing Land Supply position, in accordance with Paragraph 35 of the NPPF.

MATTER 4: EMPLOYMENT AND THE VITALITY AND VIABILITY OF CENTRES

4.1 Are the revised Employment Land designations set out in the Topic Paper (paragraph 3.6.4.2) justified, necessary for soundness and in general conformity with the London Plan? In particular, is the re-designation of Cork Tree Retail Park from LSIS to SIL justified by the evidence and necessary for soundness?

Yes. **Paragraph 119** of the NPPF is clear that strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land. **Paragraph 120** of the NPPF goes on to state that planning policies should:

“[P]romote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs... [for example by] building on or above... car parks.”

The NPPF clearly recognises the role that existing retail parks and their associated surface-level car parking can play in meeting objectively assessed local needs. Accordingly, and as set out within the Employment Land Audit (2021), Cork Tree Retail Park (CTRP) is considered to be a highly suitable location for industrial intensification due to its relatively large size, close proximity to the North Circular – accessed via Hall Lane – and simple ownership structure, which is held within a single freehold ownership.

While the Audit initially noted that CTRP was suitable for designation as LSIS, and presented limited opportunities for intensification when considered in isolation, these were noted to markedly improve if the site was considered for intensification in conjunction with the adjoining SIL to the north: namely, Hall Lane (SIL 1). In this context, the Audit noted that CTRP could be considered to be suitable for large-scale (and SIL-appropriate) storage and distribution operations given its close proximity to the Strategic Road Network, as well as a suitable host for smaller 'last-mile' distribution activities. On account of its locational attributes and relative lack of environmental constraints, the Audit notes that CTRP may also be a suitable candidate for innovative, multi-storey typologies which incorporate light industrial uses on the upper floors. Accordingly, the Audit notes that the industrial-led re-development of the site could ultimately provide up to 50,076 sqm of new floorspace.

The conclusions of the Employment Land Audit informed the initially-proposed designation of CTRP as an LSIS site. However, in light of the site's characteristics outlined above – not least its relative lack of environmental constraints and location adjacent to an existing SIL – the proposed re-designation of the site as a SIL is considered to be sound, justified and to stand the best chance of realising the Draft Local Plan's vision for the area as “a focus

for logistics – storage and distribution, light industrial and wholesale uses.” For these reasons, the re-designation of Cork Tree Retail Park from LSIS to SIL is considered to be positively prepared, justified, effective and consistent with London- and national-level policy in line with Paragraph 35 of the NPPF.

4.2 Is the designation of part of Blackhorse Lane as part SIL/part LSIS justified by the evidence? Will it be in conformity with the London Plan and what main modifications are necessary to Policy 26 for soundness?

Yes. As noted above, our clients have collaborated closely with LBWF, the GLA and neighbouring landowners to prepare a Masterplan Framework for the wider Blackhorse Lane SIL. The Blackhorse Lane SIL Masterplan Framework satisfies the requirements of London Plan Policy E7 and the associated guidance contained within the Mayor’s Draft Industrial Intensification and Co-location Practice Note (November 2018). This document – the Blackhorse Lane SIL Masterplan Framework – consists of three parts: Stage 1, Stage 2A and Stage 2B.

The Stage 1 Masterplan Framework (April 2020) was based on an initial evidence-led assessment of the Blackhorse Lane SIL, which sought to identify the areas most suitable for industrial intensification and consolidation. As part of the assessment, the following criteria were thoroughly researched through spatial, physical and land ownership data:

- Exclusion zone (in relation to the Thames Water Spine Tunnel which runs through the SIL);
- Vehicular access;
- Boundary conditions and sensitivity;
- Business and landowner intentions;
- Existing density;
- Ownership consolidation;
- Condition and merit of existing stock; and
- Deliverability.

This evidence-based approach to identifying the areas most appropriate for industrial intensification and consolidation and, implicitly, those areas best-placed to accommodate new uses, produced a series of options (see Chapter 4 of the Blackhorse Lane SIL Masterplan Framework Stage 1 Report), each of which was then thoroughly tested. This, in turn, resulted in the identification of three sub-areas:

1) The Northern Sub-area, which is capable of delivering intensified, consolidated industrial uses (with the exception of the school site);

2) The Central Sub-area, which is capable of re-providing some existing employment floorspace, whilst having greater scope for the introduction of non-industrial uses (including employment, leisure and residential); and

3) The Southern Sub-area, which is identified as having the potential to accommodate industrial uses whilst also serving as a zone of transition to the adjoining residential area to the south.

The Stage 1 study provided the baseline, evidence base and initial direction for the future vision of the area. With respect to the existing character of the SIL, the study found that its (ageing, low-density) building stock neither met occupier demand nor reflected the changing nature of industry in the area, which – uniquely among London’s SILs – increasingly consists of creative and artisan businesses. The SIL’s large warehouse spaces were noted to have become particularly difficult to let, while the overall quantum of available floorspace on the SIL was observed to have increased to its highest level since 2013. In addition, a London-wide SIL Assessment and Sector and Employment Space Assessment was conducted by Turley and formed part of the Stage 1 study. The Assessment

found that, in contrast to the majority of SILs, Blackhorse Lane does not serve a utilities function and has no on-site heavy industry, making it distinct from the 43 SILs which do.

In contrast, however, the SIL was found to have a high proportion of service-oriented businesses compared to other SILs in London, which would benefit from improvement to the public realm and legibility, as well as better integration with the surrounding neighbourhoods. Indeed, on account of its Opportunity Area (Upper Lee Valley) location, relatively high PTAL rating, and residential-compatible existing uses, the study found that a new neighbourhood could even be created within the SIL itself. The inclusion of a residential element would, the study noted, also help to incentivise investment, and cross-subsidise the building of high-quality, modern industrial space in innovative typologies.

Together with an assessment of edge conditions, access arrangements, and neighbouring uses, the above evidence informed the production of an ambitious new vision for the area. This comprises the consolidation and intensification of the existing industrial uses within new bespoke, fit-for-purpose buildings towards the north of the area (within the retained SIL boundary), and the introduction of a mix of industrial, residential and associated uses towards the south (i.e. within the re-designated area of LSIS). Crucially, the Stage 1 study also confirmed that the Blackhorse Lane SIL could be re-developed whilst adhering to the principle of no-net loss of industrial capacity.

The BHL SIL Masterplan Framework Stage 2 (Part A) Document was subsequently produced. This developed the spatial and policy approach set out in the Stage 1 study, and drew on extensive stakeholder engagement to ensure that the document was responsive to the needs of local industry (and the wider Blackhorse Lane community). To that end, a key requirement of the Blackhorse Lane SIL Masterplan Framework is that future development be 'industry-first' with 'net positive phasing' to ensure that, at the end of each phase (after the first phase), the overall amount of industrial floorspace provided on a site is no less than the existing floorspace, enabling existing businesses to remain on site and minimising the need for businesses to move more than once. The Blackhorse Lane SIL Masterplan Framework Stage 2 (Part A) Document was subsequently signed off by the GLA in June 2022 and published on the Council's website.

Further detail at the sub-area specific scale is currently being progressed via standalone Sub-Area Strategies to develop the Blackhorse Lane SIL Masterplan Framework at a finer grain of detail. Indeed, our client – whose site is located within the Central Sub-Area – is currently collaborating with the Council, neighbouring landowners and the GLA (as a consultee) with regards to the preparation of a Central Sub-area Strategy (Stage 2 Part B of the Blackhorse Lane SIL Framework). This will provide further information and detail at the sub-area scale. On completion, the Masterplan Framework will be adopted as an SPD by LBWF to guide development within the Blackhorse Lane SIL.

The Blackhorse Lane SIL Masterplan Framework has been carefully designed to achieve a net increase in the industrial capacity of the site – in accordance with the London Plan – and is set to deliver an increase of approximately 17,000 sqm of industrial floorspace through intensification across the remaining SIL and newly-designated LSIS. In addition to providing new, high-quality industrial floorspace to meet occupier needs, the Blackhorse Lane SIL Masterplan Framework will also help to realise the Local Plan's ambitions to increase employment capacity.

The above approach towards the partial re-designation of the Blackhorse Lane SIL fully accords with Draft LP1 Policy 26 (Safeguarding and Managing Strategic Industrial Land (SIL)), which states that a Masterplan approach should be followed for proposals seeking to deliver industrial intensification on SIL-designated sites. This policy is itself in line with the approach set out in London Plan Policy E7(b). The Policy encourages Development Plans and planning frameworks (i.e. Masterplans) to 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. The designation of part of Blackhorse Lane as part SIL/part LSIS is therefore considered to be justified by the evidence, and to conform with the London Plan.

No modifications other than those set out in the Statement of Common Ground (SoCG) between the Council and the GLA (March 2022) are considered necessary to ensure the soundness of Draft LP1 Policy 26. The modifications proposed by the GLA and agreed with the Council seek – with reference to London Plan Policy E4(A) – to provide for a more comprehensive range of use types for SIL that better reflect the London Plan. These modifications are supported by our client and considered satisfactory to ensure the soundness of Policy 26.

In summary, and in accordance with Paragraph 35 of the NPPF, the proposed designation of Blackhorse Lane as part SIL/part LSIS is considered to be positively prepared, justified, effective and in conformity with national-level policy and the London Plan.

MATTER 6: BUILT ENVIRONMENT, HERITAGE AND DESIGN

6.3 At a strategic level, are the sites/locations identified on the map at Figure 2 of the Topic Paper (LPE30 page 52) as having potential for tall buildings appropriate and justified by the evidence? To what extent has the Skyline Study (LPE46) informed the sites/locations identified in Figure 2?

Yes, with respect to the identification of Blackhorse Lane in Figure 2 of the Topic Paper as a potentially suitable location for tall buildings. The approach to tall buildings in this area has been closely informed by the Skyline Study (November 2021). The Study provides an examination of the constraints and opportunities presented by the Blackhorse Lane area and its surrounds. The Study recognises the need to protect the amenity of existing homes and school – and, crucially, respect the sensitivity of the neighbouring Wetlands – whilst also capitalising on the potential for industrial and mixed-use intensification of the area.

The Skyline Study also provides guidance as to the most suitable locations for tall buildings within Blackhorse Lane. As set out in the Topic Paper (Paragraph 6.1.7.2), this guidance is supplemented by, and has been prepared concurrently with, the design-led approach to height and massing set out in the Masterplan Framework (Stage 2 – Part A) for the Blackhorse Lane SIL. In accordance with London Plan Policy D9 (Tall Buildings) and Draft LP1 Policy 57 (Tall Buildings), the Framework identifies several locations – or ‘Areas of Transformation’ – which are potentially suitable for ‘Tall’ (18+ storeys) buildings, provided that they are of exceptional design. That tall buildings are deemed to be best-suited to the Central and Southern Sub-Areas is justified on the grounds of, *inter alia*, the comparatively high accessibility of the two Sub-Areas; their proximity to the taller, denser residential character that is already emerging to the south of the SIL; and their potential to incorporate a co-located mix of uses. Conversely, the Blackhorse Lane SIL Masterplan Framework notes that the Northern Sub-Area is a less appropriate location for tall buildings given its lower accessibility, the wider context of adjoining uses, and its comparatively greater suitability for intensified industrial uses. The Skyline Study shares these conclusions and similarly confirms that, within Blackhorse Lane, tall buildings are likely to be most appropriate within the SIL’s Central and Southern Sub-Areas.

The Blackhorse Lane SIL Masterplan Framework and Skyline Study also align with respect to how the future development of the site should respond to its neighbouring context. Both documents, for instance, specify that low- or mid-rise frontages should be presented to Blackhorse Lane and the Walthamstow Wetlands on account of the sensitivity of these areas, with tall buildings stepping up in height and marking key public spaces towards the centre of the SIL to assist with wayfinding and, ultimately, the creation of an attractive and cumulatively coherent skyline.

In keeping with the above, our client’s planning application for the Uplands Business Park and Forest Trading Estate – which is located within the Central Sub-Area – provides for a number of tall buildings, their designs informed by a

height and massing strategy that has had regard to the Blackhorse Lane SIL Masterplan Framework and, in addition, evolved through extensive pre-application engagement with the Council, GLA and the independent Design Review Panel alongside key local stakeholders and the wider community. The application seeks to create a new place which will set a local benchmark for high-quality design and exhibit high-quality architecture – particularly with regards to the tall buildings proposed for the site, which in locational terms reflect the guidance set out in the Blackhorse Lane SIL Masterplan Framework and Skyline Study.

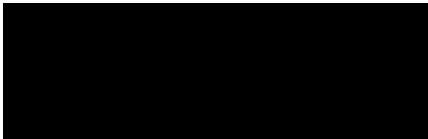
In summary, therefore, the identification of Blackhorse Lane in Figure 2 of the Topic Paper as a potential location for tall buildings is considered to be appropriate and justified by the evidence. Its inclusion in Figure 2 has been closely informed by the Skyline Study, which has itself benefitted from the robust design-led approach to height and massing set out in the Masterplan Framework (Part A) for the Blackhorse Lane SIL. In accordance with Paragraph 35 of the NPPF, the Draft Local Plan is therefore considered to be positively prepared, justified, and effective with respect to its identification of Blackhorse Lane as a suitable location for tall buildings.

Conclusion

In summary, our client is strongly supportive of the plan's vision, objectives, and spatial strategy for the development of the borough, particularly as concerns their site. Those Draft Local Plan policies which have a bearing on our client's site are considered to be positively prepared, justified, effective and consistent with both London- and national-level policy, in accordance with Paragraph 35 of the NPPF.

We would welcome the opportunity to discuss the above comments with you further, should you find this of assistance. If you have any queries, please do not hesitate to contact myself or Sam Brown at our London office.

Yours sincerely,



Catriona Fraser
Director

