



**LONDON BOROUGH OF WALTHAM FOREST LOCAL PLAN
PART 2 SITE ALLOCATIONS PROPOSED SUBMISION
VERSION CONSULTATION**

Presented by the Head of Planning.

SUMMARY

The London Borough of Waltham Forest are consulting on their Proposed Submission version Local Plan Part 2 (Site Allocations). The Local Plan Part 1 Strategic Policies was adopted on 29 February 2024.

The Authority's draft representations on the Part 2 Site Allocations are set out in the letter attached as Appendix A to this report. These take account of the changes made in response to the matters raised during previous rounds of consultation. They also respond to two new matters raised by the Council requiring changes to the Local Plan Policy Map, namely changes to the locations identified as suitable for tall buildings and changes to the classification of industrial locations.

The representations that have been made are largely supportive but also pick up some further minor amendments where appropriate in respect of eleven site allocations within and adjacent to the Regional Park at Leyton, Lea Bridge Road, Low Hall and at sites on Sewardstone and Lea Valley Road.

A leisure based site allocation for both the Ice Centre and the WaterWorks Centre and car park as previously sought by the Authority has not been included in the current proposed submission version document. It is understood from discussions with officers at London Borough of Waltham Forest that the Site Allocations are exclusively focused on meeting housing and employment needs and that sites wholly within the Green Belt and Metropolitan Open Land (MOL) have not been included. There is however a commitment from the London Borough of Waltham Forest (LBWF) to work collaboratively with the Authority on realising the leisure and sporting potential of key sites/venues within the Borough, principally through a master planning and Development Performance process. This will be covered in a Statement of Common Ground as part of the Local Plan Part 2 examination process. It should also be noted that since the Authority previously commented on the Site Allocations, the Local Plan Part 1 has been adopted and this includes a number of polices that offer support for the Regional Park, the remit of the Authority and specifically support

opportunities to grow the visitor and sporting offer of the Lee Valley Regional Park and its venues; including the Lee Valley Ice Centre, the Lee Valley WaterWorks Centre and the Lee Valley Hockey and Tennis Centre, (Policy 9).

Further discussions will be held with the London Borough of Waltham Forest regarding the Statement of Common Ground and the collaborative planning process for sites within the Regional Park. Formal representations will also be submitted taking forward the comments set out in the letter at Appendix A to this report for consideration at the Local Plan Part 2 examination in due course.

RECOMMENDATIONS

Members Approve: (1) The comments as set out in Appendix A to this report as the Authority's formal response to the consultation by the London Borough of Waltham Forest on the Proposed Submission version Local Plan Part 2 Site Allocations.

BACKGROUND

- 1 The Waltham Forest Local Plan is formed of two parts which together set out the Council's spatial and planning policy framework to promote, shape and manage sustainable, inclusive growth in the borough until 2035. The Local Plan Part 1 was adopted in February 2024. It sets out the vision and strategic objectives to achieve inclusive growth and the spatial approach to development across the southern, central and northern parts of the borough and has established a need for 27,000 new homes and 52,000sqm of new employment space. Local Plan Part 1 includes the strategic and development management policies that will be used to assess all planning applications and used to deliver development across the borough.
- 2 Local Plan Part 2 (Site Allocations) complements Local Plan Part 1. It allocates specific sites to provide new housing, jobs and social infrastructure, and sets out guidance for their development. The sites identified are those that the Council expects be developed over the Plan Period and for which the provision of further guidance is considered important to achieve inclusive growth. Both parts of the Local Plan will be used to inform decisions on planning applications. This is important because Local Plan Part 1 includes a number of policies that offer support for the Regional Park and the remit of the Authority. In particular:
 - Policy 82 'Lee Valley Regional Park'. This provides support for the Authority's Park Development Framework and Area Proposals as they apply to the Park within Waltham Forest and seeks to ensure development affecting the Regional Park does not contribute to adverse impacts on amenity, ecological integrity or visitor enjoyment.
 - Policy 9 South Waltham Forest (a priority area for regeneration and growth) also offers support for proposals which "Create opportunities to improve and grow the visitor, sporting and wider cultural offer of the Lee Valley Regional Park and its venues; including the Lee Valley Ice Centre, the Lee Valley WaterWorks Centre and the Lee Valley Hockey and Tennis Centre, thereby ensuring their long-term sustainability and contribution to the visitor economy of the borough."
- 3 Sites included in the Part 2 Local Plan have been through a selection process

that accords with national planning policy, the London Plan, the Council's Call for Sites exercises (2017- 2019), and the findings of the Growth Capacity Study 2018. The Council's Industrial Land Audit (2021) as well as site or area specific industrial masterplans have informed the process in relation to the suitability of the borough's industrial land for various uses and the scope for industrial intensification, co-location, substitution. The representations received through the earlier rounds of consultation have also informed the current site allocations. Finally, the Local Plan Part 2 has also been updated to align with additional evidence that came forward during the examination of the Local Plan Part 1, which concluded in January 2024.

- 4 Local Plan Part 2 makes provision for 103 site allocations to meet housing and employment needs in the Borough. These are defined as 'Strategic' or 'Key/Non-Strategic' to realising the Council's priorities. A Strategic Site is defined as those capable of either delivering 100 or more new homes, delivering new employment space and/or is found in a Strategic Location. Key sites or 'Non-Strategic' sites are those that would deliver 99 or less new homes and are outside Strategic Locations, but remain important to the delivery of the vision for inclusive growth in a specific area, including bringing stalled sites forward.
- 5 Each site allocation sets out information about the site and relevant planning policy designations, including a site boundary and constraints plan, an indicative development capacity according to the type of use/s proposed, and potential delivery timescale. Site Requirements and a Placemaking Plan set out spatially specific aspects that must be taken into account in any proposals; for example requirements for and location of access provision, connectivity improvements, public realm, active frontages, and areas of change.
- 6 The Authority responded in detail to the earlier rounds of consultation on the draft Local Plan Part 2 most recently to a previous draft Regulation 19 version of the Local Plan Part 2 Site Allocations dated November 2021, (Paper RP/57/21). In its response the Authority sought a leisure based allocation for the Ice Centre and WaterWorks Centre and car park in order to protect the long term future of these areas. Both these areas are within Metropolitan Open Land (MOL) and the Council's position as presented at that time in their Growth Strategy, made clear that sites within MOL and Green Belt (GB) were excluded from consideration for allocation.
- 7 A number of other detailed points concerning allocations both within and adjacent to the Park were also raised including the need to recognise the Regional Park as a 'planning designation' where sites sit either wholly or partially within the Park, a requirement for a stronger emphasis to be placed on the provision of green space and ecological enhancements and the need to identify pedestrian and cycle connections rather than leaving these as matters to 'be explored'.

LOCAL PLAN PART 2 SITE ALLOCATIONS PROPOSED SUBMISSION VERSION 2024

- 8 Comments are now sought on the updated site allocations contained within the Proposed Submission Version of Local Plan Part 2. After the consultation period, the Council intend to submit the Part 2 Site Allocations to the Secretary of State in the autumn/winter 2024 for independent examination in 2025. Adoption is anticipated later in 2025. Representations made to this version must consider whether the LP2 Site Allocations document is 'sound'; that it has

been 'positively prepared', and is 'justified' and 'effective' and consistent with national policy. All representations received will be submitted to the Secretary of State for consideration at the examination.

- 9 The following paragraphs focus on the extent to which the Authority's previous comments have been taken on board in the Proposed Submission version of LP2 and identify a couple of new matters of relevance. The letter at Appendix A to this report sets out the Authority's draft formal response and representations.

10 New Matters - Policy Map Changes

Preparation of the Local Plan Part 2 has resulted in further proposed changes to the policy designations in Part 1 which also require amendments to the Policy Map. These relate to locations suitable for tall buildings and changes to the classification of industrial locations. These changes carry over into the Site Allocations and where relevant have been responded to in the Authority's representations at Appendix A to this report.

11 Updated Locations Suitable for Tall Buildings

The locations for tall buildings identified in the Local Plan Part 1 have been informed by a Skyline Study. This has been updated in support of Local Plan Part 2. It tests an illustrative development scenario on each site to consider site allocations where tall buildings as defined by Policy 54 'Tall Buildings' could be appropriate. This process takes account of local character, proximity to public transport accessibility, walking and cycling networks and nearby facilities. As a result twelve amendments have been made to the 'locations suitable for tall buildings' designation with locations within the Park both added and removed. These changes are then carried forward into the Site Allocations. Relevant site allocations include:

- Low Hall Depot Industrial Area and adjacent sites - whole site removed.
- Rigg Approach Industrial Area – part of site added adjacent to Lea Bridge Road.
- Lammas Road Industrial Area – part of site added adjacent to Lea Bridge Road.

12 Changes to Strategic and Locally Significant Industrial Locations

Updated evidence on industrial locations is also relevant to site allocations within and adjacent to the Park. It has resulted in the following proposed changes (which are subject to the agreement of the Greater London Authority (GLA)) to the 'Strategic Industrial Location (SIL)' and 'Locally Significant Industrial Sites (LSIS)' policy designations which ensures an overall net gain of approximately 1.58 ha of land designated as a Strategic Industrial Location (SIL) in Waltham Forest.

- The southern part of the Rigg Approach Strategic Industrial Location (SIL6) is to be redesignated as a Locally Significant Industrial Site (LSIS).
- The northern part of the Lammas Road Strategic Industrial Location (SIL7) is to be redesignated as a Locally Significant Industrial Site (LSIS).
- Re-designation of the Low Hall Depot Industrial Area as a Strategic Industrial Location and designation of an enlarged Argall Avenue Strategic Industrial Location.

CHANGES TO LOCAL PLAN PART 2 SITE ALLOCATIONS IN RELATION TO THE ISSUES PREVIOUSLY RAISED BY THE AUTHORITY AND NEW MATTERS

13 Lee Valley Ice Centre and the Waterworks Centre and Car Park

The proposed Submission version Local Plan Part 2 does not include leisure based site allocations for the Ice Centre site or the WaterWorks Centre and car park as previously sought by the Authority. In discussions with officers from LBWF it has been clarified that the focus for LP2 is to provide housing and employment allocations to meet the Council's targets, identifying the most efficient use of land on existing sites to provide housing and employment, including through colocation. Town centre and community uses are identified but only as part of, and ancillary to, a residential allocation. Sites within the Green Belt and exclusively within MOL have not been included.

- 14 A Statement of Common Ground has been proposed by officers of the LBWF as a mechanism to recognise the Authority's requirements in terms of delivering improvements and sustainable growth within its leisure and sporting landholdings and venues and to demonstrate a commitment to work with the Authority through a master planning and Development Performance process to achieve these aims. This would be submitted alongside the Proposed Submission Site Allocations document as part of the Examination process. It is also the case that now the Local Plan Part 1 has been adopted there are strategic and development management policies in place to support the Authority in bringing forward enhancements and development at the Ice centre and WaterWorks Centre to improve and grow the visitor, sporting and wider cultural offer of these venues. Further discussions will be held between both parties to produce the Statement of Common Ground for submission as part of the Part 2 Site Allocations Examination process.

15 Site Allocations Previously Identified as of Relevance

In response to the previous Regulation 19 round of consultation, the Authority commented on 11 site allocations considered relevant to the Regional Park. These are listed below with site reference numbers in brackets and shown on the plans attached at Appendix B to E to this report:

South Waltham Forest

- Leyton Mills Retail Park (R19001) and New Spitalfields Market (R19002) situated outside but adjacent to the Park opposite the Lee Valley Hockey and Tennis Centre (LVH&TC).
- Low Hall Depot (R19055) note this site has been extended as part of the current consultation – it sits partially within the Park to the north east of Walthamstow Marshes.
- Argall Avenue Industrial Area (R19040) and Rigg Approach Industrial Area (R19041) - the north east portion of the Argall Avenue site and all of the Rigg Approach are located within the Regional Park.
- Lammas Rd Industrial Area (R19042) and Orient Way Industrial Area (R19043) - the Lammas Road industrial estate is located within the Regional Park adjacent to the Lee Valley WaterWorks centre and Nature Reserve. Orient Way Site Allocation is set back some distance from the

Regional Park behind Lammas Rd and Orient Way itself.

Central Waltham Forest

- Blackhorse Lane Industrial Area (R19080) located outside the Park adjacent to Walthamstow Reservoirs Site of Special Scientific Interest (SSSI), which forms part of the Lee Valley Special Protection Area (SPA) and Ramsar.

North Waltham Forest

- North Circular Industrial Area (R19034) - situated outside but adjacent to the Regional Park boundary, north of Banbury Reservoir and south of North Circular.
- Motorpoint, Sewardstone Road (R19027) and 3 Lea Valley Road (R19028) – both sites are within the Park east of the King George's and William Girling Reservoirs.

16 The main concerns raised by the Authority during this previous consultation were focused on the content of the Site Requirements and Placemaking Plans included as part of each Site Allocation, to ensure that they:

- provided for sufficient open and amenity space within each site to meet the needs of new residents, incorporating urban greening and tree planting where appropriate;
- considered the visual and ecological impacts of future development in relation to the Park, providing appropriate buffers, complementary on site habitats, dark corridors and landscaping to enhance ecological connectivity;
- provided clarity on the height parameters of new development taking into consideration views through into both the Regional Park (including views to the north 'up the valley') and the Queen Elizabeth Olympic Park (QEOP); maintaining views south through to the Lee Valley VeloPark will be important for example;
- provided for enhanced walking and cycling connectivity with the Park and improved the public realm of key routes through the Park particularly where sites lie adjacent to main east west routes; and
- identified the need for enhancements to adjacent waterways such as the Flood Relief Channel, Dagenham Brook and their biodiversity value, landscape and water quality.

The Authority also sought the inclusion of the Regional Park as a relevant Planning Designations in each of the site allocations.

17 A large proportion of the above concerns have been addressed in the current Proposed Submission version of the Site Allocations with additional relevant development requirements added which could benefit the Park, and this is to be welcomed. The Lee Valley Regional Park has now been added as a relevant Planning Designation to all the Site Allocations within and adjacent the Park. These changes can be supported and are detailed in the letter at Appendix A to this report.

18 **Leyton Mills Supplementary Planning Document**

In July 2024 the Leyton Mills Supplementary Planning Document (SPD) was adopted by LBWF. This sets out detailed guidance on how future development

and associated infrastructure can be brought forward across 3 key development sites, and the Lee Valley Hockey & Tennis Centre (LVH&TC). The 3 development sites are included in the Site Allocation document, namely the Leyton Mills Retail Park (R19001), the New Spitalfields Market (R19002) and the Temple Mills Bus Depot (R19085). Officers from the Authority were involved in discussions with the Council and other stakeholders on the content and detail of the development framework and Members considered a report on this matter in April this year Paper RP/80/24.

- 19 **The SPD identifies Eton Manor as a Suitable Alternative Natural Greenspace (SANGS) and this is mirrored in the Site Allocations document with Eton Manor identified as a SANGS site to which developer contributions will be directed.** This means it is considered suitable for potentially providing visitor uplift capacity for the new homes proposed within South Waltham Forest. Officers have worked with LBWF on the SANGS requirement for Eton Manor/LVH&TC and have been clear that more detailed work will be required on the ability of this site to provide SANGS for development given the Authority's evolving plans for improvements to sporting facilities at the venue. Following the Authority's response to the SPD it has been clarified that the exact arrangement and approach for SANGS provision will be developed in discussion between Lee Valley Regional Park Authority (LVRPA) and LBWF. All three site allocations require development to "Support the principles of and ensure compliance with the Leyton Mills SPD (2024).

- 20 **Locations Suitable for Tall Buildings at Rigg Approach and Lammas Road** It should be noted that alongside the re-designation of the southern part of the Rigg Approach Strategic Industrial Location as a Locally Significant Industrial Site (LSIS) the Council have amended the site allocation to allow for the delivery of approximately 390 new homes including affordable housing. This 'area of change' is identified on the Placemaking Plan and is adjacent to the road frontage. This is subject to the agreement of a two-stage industrial masterplan. The site allocation also requires the Greyhound Pub to be re-provided, public realm on to Lea Bridge Road to be enhanced and the delivery of tree planting and coordinated landscaping. The area of change is also the portion of the site considered as a 'location suitable for tall buildings' under the changes proposed to the Policy Map. This is defined as buildings of 18 storeys or more with an indicative range of 18 to 20 storeys.

- 21 **A similar change has been made to the Lammas Road Industrial area.** The northern portion of the site adjacent to Lea Bridge Road has been redesignated as a Locally Significant Industrial Site and designated as suitable for tall buildings with an indicative range of 18 to 20 storeys. It is identified as an Area of Change potentially capable of providing space for 240 new homes, also subject to the agreement of an industrial masterplan. In both cases development proposals are to provide "as a minimum, and in addition to any other uses introduced in the Areas of Change, the full replacement of existing industrial capacity with industrial uses that are acceptable in a Strategic Industrial Location and seek to provide an uplift in industrial capacity through the provision of multi-storey schemes and more efficient building typologies". Please refer to the plan included as Appendix E to this report which shows the Areas of Change.

- 22 **An objection should be raised to the tall building designation as it applies to the Areas of Change within the Rigg Approach and Lammas Rd site allocations and as proposed to be shown on the Policy Map.** These new designations identify

areas suitable for tall buildings fronting on to Lea Bridge Road and the main open spaces of the Regional Park. They will have a considerable impact on the visual amenity and visitor enjoyment of the Park. The replacement of low level industrial buildings with blocks up to 18 or 20 storeys would draw the surrounding urban area further into the Park eroding the open nature of the Park and interrupting views of the open skyline that typifies the open space character of the Walthamstow Marshes and Waterworks Nature Reserve.

- 23 The Lee Valley Regional Park Landscape Strategy Guidelines seek to protect the open character of the landscape in this section of the Park, highlighting the need to protect areas where open skylines predominate particularly given their sensitivity to development which may alter the skyline (LCA C3 and E2.). The Guidelines recognise the need for development adjacent to the Park to enhance the existing landscape framework so that it can integrate physically and visually with the open and marshland character. The harsh and visually intrusive development edges to the east and around Lea Bridge should be improved.
- 24 At this stage there is no indication that the evidence base underpinning the site allocations have taken account of the Regional Park and its openness in respect of the additional tall buildings designation for these areas. References to buffer habitat and new green edges and the design and siting of buildings to protect and enhance the openness will not be sufficient to overcome the enclosing and barrier effect of tall buildings in these locations, particularly given the cumulative impacts with consented schemes such as the Lea Bridge Station sites which include residential blocks with heights of 23 and 26 storeys. The Authority has not been sighted on the industrial masterplans for these areas so has had little input into the masterplan process. The nature of development within the Lammas Rd industrial estate is particularly relevant to the Authority given its longer term plans to bring forward the Waterworks centre and car park for visitor accommodation and related leisure uses.
- 25 **Folly Lane Traveller Site (R19127)**
It should be noted that the Local Plan Part 2 has included allocations for the two existing sites for Gypsy and Travellers accommodation in the borough so that through the intensification of these sites the Council can meet identified need in at least the first five years of the Plan Period. One of these allocations is for the well-established traveller site at Folly Lane within the Regional Park and the Green Belt situated east of Banbury Reservoir, (please refer to the plan at Appendix D). Policy 22 Gypsies and Travellers and Travelling Showpeople in the Local Plan Part 1 protects existing provision and supports the intensification of existing sites to provide additional pitches as long as this meets certain criteria in terms of the provision of facilities, parking, open space and play areas, connections to services and public transport.

ENVIRONMENTAL IMPLICATIONS

- 26 There are no environmental implications arising directly from the recommendations in this report but the draft Local Plan Part 2 Site Allocations for Waltham Forest, once adopted will contain site requirements for development proposals within the borough that could have an impact on the protection, enhancement, and development of the Regional Park.

FINANCIAL IMPLICATIONS

- 27 There are no financial implications arising directly from the recommendations in

this report.

HUMAN RESOURCE IMPLICATIONS

28 There are no human resource implications arising directly from the recommendations in this report.

LEGAL IMPLICATIONS

29 Planning applications referred to this Authority are submitted under the consultative arrangements of Section 14 (4-7) of the Lee Valley Regional Park Act 1966. The Act requires a local planning authority to consult with the Authority on any planning application for development, whether within the designated area of the Park or not, which might affect any part of the Park.

30 The Park Act enables the Authority to make representations to the local planning authority which they shall take into account when determining the planning application.

RISK MANAGEMENT IMPLICATIONS

31 There are no risk management implications arising directly from the recommendations in this report.

EQUALITY IMPLICATIONS

32 There are no equality implications arising directly from the recommendations in this report.

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BACKGROUND REPORTS

The London Borough Waltham Forest Local Plan Part 2 August 2024
(Site Allocations) Proposed Submission Consultation

PREVIOUS COMMITTEE REPORTS

Regeneration & Planning Committee	RP/11/17	Consultation by London Borough of Waltham Forest on the draft Local plan	14 Dec 2017
Regeneration & Planning Committee	RP/32/19	Consultation by London Borough of Waltham Forest on Regulation 18 draft Local Plan document	19 Sept 2019
Regeneration & Planning Committee	RP/57/21	Consultation by London Borough of Waltham Forest on Proposed Submission Regulation 19 draft	16 Dec 2021

Local Plan Part 2
Site Allocations

APPENDICES ATTACHED

Appendix A	The Authority's draft response to the London Borough of Waltham Forest
Appendix B	Plan showing sites allocated within Park on Lea Valley Rd
Appendix C	Plan showing Low Hall area and Spitalfields New Market site allocations
Appendix D	Plan showing industrial site allocations adjacent to the Park at North Circular and Blackhorse Lane
Appendix E	Plan showing industrial site allocations within the Park at Rigg Approach, Argall Ave, Lammas Rd and Orient Way

LIST OF ABBREVIATIONS

MOL	Metropolitan Open Land
LBWF	London Borough of Waltham Forest
PDF	Park Development Framework
SSSI	Site of Special Scientific Interest
LVH&TC	Lee Valley Hockey and Tennis Centre
GLA	Greater London Authority
SPD	Supplementary Planning Document
QEOP	Queen Elizabeth Olympic Park
SIL	Strategic Industrial Location
GB	Green Belt
LSIS	Locally Significant Industrial Sites
SPA	Special Protection Area
SANGS	Suitable Alternative Natural Greenspace
LVRPA	Lee Valley Regional Park Authority
SINC	Site of Importance for Nature Conservation

Appendix A to Paper RP/85/24



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19 September 2024

Dear Sarah

RE: CONSULTATION ON THE LOCAL PLAN PART 2 SITE ALLOCATIONS PROPOSED SUBMISSION VERSION 2024 - LEE VALLEY REGIONAL PARK AUTHORITY REPRESENTATIONS

Thank you for consulting the Regional Park Authority on the Local Plan Part 2 Site Allocations Proposed Submission Version 2024. A report on this matter was considered by the Authority's Members at the Lee Valley Regeneration and Planning Committee on the 19th September 2024 when the following representations were agreed.

Proposed Submission version Local Plan Part 2 Site Allocations Document

The Authority previously commented on 11 of the Site Allocations included within the earlier draft Regulation 19 version of the Local Plan Part 2 Site Allocations (November 2021). It is noted that this Proposed Submission Version has been updated following the consideration of all consultation comments, the evidence produced to inform the Local Plan Part 1 examination and additional studies and evidence/masterplans produced to support preparation of the Local Plan Part 2. The Authority's comments on the changes made and any new matters are set out below under the relevant Site Allocation. These will be formally submitted as representations to the Part 2 Local Plan by the deadline of the 9 October.

South Waltham Forest

Leyton Area

Site Allocations - Leyton Mills Retail Park (R19001), New Spitalfields Market (R19002) and new allocation Temple Mills Bus Depot (R19085).

The Authority's previous comments on the site allocations for Leyton Mills Retail Park and New Spitalfields Market were largely supportive. The Temple Mills site is a new allocation and all 3 sites lie outside the Regional Park opposite the Lee Valley Hockey and Tennis Centre (LVH&TC). More recently the Authority was involved in discussions

with the Council and responded to the consultation on the Leyton Mills Supplementary Planning Document (SPD). The SPD covers the 3 sites and the LVH&TC and was adopted by the Council in July 2024.

The Authority maintains its support for the site requirements included across the 3 allocations which require development proposals to address connectivity and access enhancements as follows:

- Deliver new pedestrian and cycling connectivity through the sites linking with the new proposed station at Ruckholt Rd, with Leyton Station in the case of the allocation for Leyton Mills Retail Park and with the Queen Elizabeth Olympic Park (R19001 Point k and 19002 Point O)
- provide safe crossing points over Ruckholt Road/Eastway and Temple Mills Lane (19002 Point O and 19085 Point I)
- Safeguard land for and contribute to a new green cycle and pedestrian bridge linking the site at Leyton Retail Park into the Queen Elizabeth Olympic Park (R19001 Point L, R19002 Point H and 19085 Point)

An amendment is required however to include reference to the Regional Park alongside reference to Queen Elizabeth Olympic Park (QEOP) as these connections will open up access to the wider Regional Park both to the north and south of the sites.

Views

The Authority previously highlighted the need for the Placemaking Plans to consider views through into both the Regional Park (including views to the north 'up the valley') and the QEOP; maintaining views south through to the Lee Valley VeloPark. This is covered in full under Point O within site 19001 Leyton Mills Retail Park and is supported.

Biodiversity

Site Requirements for new and enhanced greening and biodiversity throughout the 3 sites is also supported (R19085 Point J, R19002 Point N and R19001 Point H).

In particular the requirement for development proposals on the New Spitalfields Market site to provide ecological and biodiversity enhancements to the setting of the Old River Lea and Hackney Marshes (R19001 Point K 19002) is welcome. These specify a green buffer at least 30m from the river edge and at least 15m from the edge of Hackney Marsh ensuring buildings are set back and limited in height closest to the buffer. It is noted that public access is also to be restricted within the 30m green buffer and this will help to protect the Old River Lea which is designated as a Site of Importance for Nature Conservation. Consideration should be given to light pollution and the avoidance of light spill within this green buffer adjoining the river. The Authority previously sought the inclusion of a 'dark corridor' along this sensitive western edge of the site where it borders with the Regional Park and Hackney Marshes and this should be included as part of the Placemaking Plan in order to enhance the existing wildlife corridor and ecological connectivity.

The Placemaking Plan shows a new ecological park to be provided within the northern portion of the New Spitalfields Market site together with the de-culverting of the Dagenham Brook (Point L). A new public square and other linked public spaces throughout the site is also a site requirement to support cultural activities and outdoor play as well as catering for pop up events (Point J). These site requirements are supported as they address the points previously raised by the Authority which sought

to ensure that each new development would be able to provide all the open space, amenity and recreational/leisure needs required by new residents and employees.

The Authority notes the provision under each of the above three Site Allocations that development will be required to “Support the principles of and ensure compliance with the Leyton Mills SPD (2024) and this is welcomed. The Authority still has concerns about the ability of the Eton Manor site to meet the requirements for SANGS (as identified in the Infrastructure List) and provide an uplift in visitor capacity for the new homes proposed in South Waltham Forest. More detailed work will be required on this matter given the Authority’s evolving plans for improvements to sporting facilities at the LVH&TC venue and the adopted SPD clarifies this point by stating that the exact arrangement and approach for SANGS provision will be developed in discussion between LVRPA and LBWF.

Low Hall Strategic Location

Low Hall Depot Industrial Area (R19055)

The Low Hall Depot Industrial Area allocation sits partially within the Park to the north east of Walthamstow Marshes. The Lee Valley Regional Park reference has been added as one of the relevant Planning Designations in the site allocation and this is welcomed. Policy 82 Lee Valley Regional Park in the Local Plan Part 1 Strategic Policies will apply.

It is noted that the site allocation no longer includes a housing allocation and is now focused on improvements to the existing depot facility and the provision of modern, flexible industrial uses, to reflect its re-designation as SIL. Enhanced public realm with biodiverse landscaping must also be provided.

The Authority previously supported the requirement for development to deliver improvements to Low Hall Flood Meadows and sought also to expand this requirement with reference to the need for a river restoration scheme for the Dagenham Brook. The Planning Requirement under Point E covers both these points stating that “ecological and biodiversity enhancements to the setting of the Dagenham Brook and to the Low Hall Flood Meadows, including implementation of a river restoration scheme and the retention of mature trees bordering the brook”

Point G also requires the design and siting of buildings and new green space to protect and enhance the integrity of the Low Hall Farm and Low Hall wood and the openness of Walthamstow Marshes/Hackney Marshes MOL and requires a lighting strategy to ensure development does not negatively impact existing ecology. Both these Planning Requirements, (Point E and G) are supported.

An amendment to the Low Hall Placemaking Plan is however required to identify opportunities for pedestrian and cycle connections into the adjoining open spaces so as to reconnect the site with the Regional Park. The previous version of the Placemaking Plan indicated enhanced pedestrian and cycle connectivity between Low Hall Sports Ground and Low Hall Flood meadows. Despite the re-designation of the area as SIL it is still important that this area is linked into the rest of the Regional Park in accordance with the PDF Area 2 Proposals. These proposals (Area Proposals 2.A.3 for Low Hall and St James’ Park) highlight the importance of reconnecting the Low Hall area into the rest of the Park at Walthamstow Marshes and improving the provision of facilities for visitors.

Lea Bridge Strategic Location

Argall Avenue Industrial Area (R19040), Rigg Approach Industrial Area (R19041) and Lammas Road Industrial Area (R19042)

The Authority notes and welcomes the inclusion of the Lee Valley Regional Park as a Planning Designation in respect of the above site allocations. This now reflects the fact that the north east portion of the Argall Avenue site and all of the Rigg Approach and Lammas Road sites are located within the Regional Park, albeit they are designated industrial sites.

Access and Connectivity

The Authority supports the Planning Requirements set out for these sites which require new pedestrian and cycling connectivity to be delivered through and around each site. This is to include links between the sites and with the Regional Park, in particular through contributions to improve the Argall Avenue footbridge over the railway and Flood Relief Channel and into the Park adjacent to the Lee Valley Riding Centre and via contributions to improving the Marsh Lane footbridge over the railway to the south of the Lammas Rd site, (R19040 points D and E, R19041 points J and K and R19042 points G and I). This would help deliver the Authority's PDF Area 2 Proposals 2.A.3 Low Hall and St James' Park and 2.A.6 Lea Bridge Road Area respectively.

The Authority supports the Planning Requirement to "consider the opportunity to resurrect ancient routes such as the Black Path and create better links to nearby landmarks such as the Coppermill Pump House and the Pumphouse Museum and other industrial/archaeological features of the Lea Valley" (R19040 Point F and R19041 Point M).

The Authority's previous comments on the need for improvements to the Lea Bridge Road frontage of the Rigg Approach site have been largely addressed under Point I and this is supported. It states that development proposals will be expected to "Enhance the existing public realm on to Lea Bridge Road to deliver a pedestrian-focused environment with biodiverse green amenity, which is accessible to all." Proposals will be expected to include tree planting and "deliver coordinated landscaping. **An additional point should be included to ensure these improvements also enhance and mark the entrance point into the Regional Park on Lea Bridge Road through appropriate directional and entrance signage incorporated into the public realm and landscaping proposals.**

Biodiversity

It is noted that the Argall Avenue and Rigg Approach Placemaking Plans also seek to provide ecological and biodiversity enhancements to the setting of the River Lee Flood Relief Channel with the requirement that development be set back to "enable access for maintenance and allow new greening to thrive" (R19040 Point J and R19041 Point O). These provisions align well with the Authority's PDF Proposals and are supported. The Authority also supports development requirements for the Lammas Road Industrial Area for new and enhanced greening and biodiversity throughout and around the site including the provision of tree planting, green spaces and green roofs (R19042 Point J). Reference has also been included to protect and enhance the openness of the adjoining MOL and the sensitive context of the WaterWorks Centre and Nature Reserve. (R19042 Point K).

Locations Suitable for Tall Buildings within the Areas of Change at the Rigg Approach and Lammas Road Site Allocations

It is noted that the both the Rigg Approach and the Lammas Road site allocations have been amended to allow for the potential co-location of residential and industrial floorspace. A section of each site adjacent to Lea Bridge Road is identified as an Area of Change to accommodate the residential element, having been redesignated as Locally Significant Industrial Sites. In both cases this is subject to the agreement of a two-stage industrial masterplan. The area of change is also the portion of the site considered as a 'location suitable for tall buildings' under the changes proposed to the Policy Map. This is defined as buildings of 18 storeys or more with an indicative range of 18 to 20 storeys.

The Authority does not consider the Area of Change within the two sites to be suitable locations for tall buildings given their location within the Regional Park and adjacent to important areas of open recreational space most of which are protected for their ecological value. This proposal is considered unsound and an objection will be raised as part of the Authority's formal representations.

It is recognised that the reconfiguration of the allocated sites to allow for residential adjacent to and on either side of Lea Bridge Road will also provide opportunities to enhance this entrance into the Regional Park along Lea Bridge Road, including through the provision of a well-designed landscaped public realm and improved access. These elements are included as development requirements in the site allocations, as is the need to design and site buildings and new green space so that it protects and enhances the integrity of adjoining Lea Valley SINC and openness of Walthamstow/Hackney Marshes MOL.

However the new designation for these areas of change as 'locations suitable for tall buildings' would open up the potential for tall buildings within the Park, on either side of Lea Bridge Rd and along the eastern boundary of the Lee Valley WaterWorks Centre. This would present a considerable change to the character of the Regional Park compared to the existing low scale industrial buildings that are largely hidden from view behind existing vegetation and trees. Despite the Site Allocation requirements for public realm and landscape improvements, tall buildings in these locations will both enclose and intrude upon the adjoining open landscape character of the Regional Park and the current visitor perception of openness and removal from the surrounding urban area. Tall buildings in these locations would create a further barrier at the Park edge, their considerable height interrupting views of the open skyline that typifies the open space character of the Walthamstow Marshes and Waterworks Nature Reserve. There would also be a cumulative impact given the proximity of consented schemes such as the Lea Bridge Station sites which include residential blocks with heights of 23 and 26 storeys.

This designation would be contrary to Local Plan Part 1 Policy 82 'Lee Valley Regional Park', which requires development proposals which affect the Park to "Be sensitive and proportionate, and not contribute to adverse impacts on amenity, ecological integrity or visitor enjoyment..." (section A.iii.). It would also be contrary to the Lee Valley Regional Park Landscape Strategy Guidelines which seek to protect the open character of the landscape in this section of the Park, and which highlight the need to protect areas where open skylines predominate particularly given their sensitivity to development which may alter the skyline (LCA C3 and E2.). The Guidelines seek to ensure development adjacent to the Park enhances the existing landscape framework so that it can integrate physically and visually with the open and marshland character

and that the harsh and visually intrusive development edges to the east and around Lea Bridge should be improved.

The nature of development within the Lammas Rd industrial estate and the proposal to allow tall buildings is particularly relevant to the Authority given its longer term plans to bring forward the Waterworks Centre and car park for visitor accommodation and related leisure uses. The Authority has not be sighted on the two stage industrial masterplans referenced for Lammas Road and the other site allocations.

Hence the Authority objections to the tall building designation as part of these site allocations and In terms of the changes proposed to the Policy Map.

Orient Way (R19043)

The Orient Way SIL Site Allocation is set back some distance from the Regional Park behind Lammas Rd and Orient Way itself. Part of this site is also now identified as suitable for tall buildings and allocated for 320 new homes as well as industrial floorspace. The site requirements have been amended to take on board the Authority's previous comments about integrated green and biodiverse corridors linking into the Park and include under Point J the requirement that greening and biodiversity should be delivered throughout and around the site and that "Consideration should be given to how greening integrates with adjacent sites to create interconnected green corridors throughout the area and into the Regional Park". This amendment is supported.

Central Waltham Forest

Blackhorse Lane Industrial Area (R19080)

This site allocation is located outside the Park adjacent to Walthamstow Reservoirs SSSI which forms part of the Lee Valley SPA and Ramsar site. The Authority maintains it support for the inclusion of Site Requirements that identify the delivery of green infrastructure and open green space alongside the shared boundaries with the Park. Support is also given for development proposals to deliver new pedestrian and cycling connectivity throughout with links to the Walthamstow Wetlands and with existing walking and cycling provision to the north, (Points I, L, and M).

The new site requirement set out under point P is endorsed where it states: "*Design and site buildings and new green space to protect and enhance the integrity of the Walthamstow Reservoirs / Walthamstow Marshes Site of Special Scientific Interest (SSSI), RAMSAR and Special Protection Area (SPA), and the Lea Valley Site of Importance for Nature Conservation (SINC), and the associated Green Corridor. The use of lighting or light pollution should be appropriately mitigated through a lighting strategy to ensure it does not negatively impact the existing ecology.*"

This relates to Local Plan Part 1 Policy 82 'Lee Valley Regional Park' bullet point C) where it requires planning applications for development at Blackhorse Lane to be accompanied by a project level HRA to ensure development does not cause any "adverse urban effects on the integrity of the Lee Valley SPA and Ramsar."

North Waltham Forest

SA63 North Circular Industrial Area (R19034)

This strategic industrial allocation is situated outside the Regional Park south of the north circular and north of Banbury Reservoir. A detailed set of site requirements are now included which address the Authority's previous comments and this is welcomed. In particular the Authority supports the requirement to enhance existing pedestrian and cycling connectivity including improvements to the underpass along the towpath under the North Circular (Point B) and requirements to extend connections through to Banbury Reservoir "as well as providing access to strategic recreational routes such as the Lea Valley Walk and the Lee Valley Pathway", (Point C). Applicants are also advised to engage with the Regional Park Authority to understand how aspirations for the development of the site can align with wider development proposals.

Previous reference to strategic cycle and pedestrian connections through to Meridian Water are however missing and should be reinstated. Edmonton Marshes the new area of public open space being created as part of the phased development at Meridian Water will be located opposite the Site Allocation to the west and provide further connections for cyclists and pedestrians through to Meridian Water Station and Tottenham Marshes.

Site requirements have been included to ensure the design and location of buildings and new green space both protects and enhances the integrity of the Lea Valley Site of Importance for Nature Conservation (SINC), and the associated Green Corridor. These requirements are endorsed as is the requirement that the use of lighting or light pollution resulting from industrial uses should be appropriately mitigated through a lighting strategy to ensure there is no negative impact on the existing ecology. (Point G).

Folly Lane Traveller Site (R19127)

The new site allocation for Folly Lane Traveller Site is noted. Whilst the requirement to potentially intensify use at this site to meet needs is recognised an expansion of the site further into the open space and the Regional Park, east of Banbury Reservoir would be contrary to the Park Development Framework (PDF) Proposals and unlikely to be supported by the Authority.

Sewardstone Road Strategic Location

Motorpoint (R19027) and Lea Valley Road (R19028)

Amendments have been made to the planning designations for both site allocations to include a reference to the Lee Valley Regional Park as requested.

These sites are located within the Regional Park and sit opposite each other adjacent to Lea Valley Road, an important east west route through the Park. Both site allocations now include a requirement for development proposals to enhance existing pedestrian and cycling connectivity along Sewardstone Road and Lea Valley Road (R19027 Point G and R19028 Point E) and the Placemaking Plans indicate public realm and public open space enhancements along the road frontages; these amendments are supported. Site requirements also identify the need for development to provide new and enhanced greening and biodiversity throughout and around the sites (Points E and D respectively).

The Motorpoint allocation which also shares a boundary with the William Girling Reservoir (and is identified as suitable for 295 new homes, town centre and community uses) requires development proposals to create a new park in the south west corner of the site and to ensure development protects and enhances the integrity of the Chingford Reservoirs Site of Special Scientific Interest (SSSI), the Lea Valley Site of Importance for Nature Conservation (SINC), and the associated Green Corridor, (Point J). These changes are all supported and have addressed comments previously made by the Authority.

Lee Valley Ice Centre site and the Waterworks Centre and car park

It is noted that the Council have decided not to include a leisure based site allocation for either the Ice Centre or the WaterWorks Centre and car park.

Discussions between officers of the Borough and the Authority have clarified that the Part 2 Local Plan is focused solely on allocating sites to meet needs for housing and employment, and within areas that sit outside Green Belt and MOL designations. The sites within the Regional Park do not therefore meet these requirements. There is however a requirement to ensure the long term future of these sites for leisure use and to enable their enhancement and development to meet changing sporting, recreational and visitor needs over the Plan period in line with the Authority's remit. The recently adopted Local Plan Part 1 contains supportive policies to assist the Authority and the Council in this respect specifically under Policy 82 'Lee Valley Regional Park' and Policy 9 South Waltham Forest which offers support for proposals which "create opportunities to improve and grow the visitor, sporting and wider cultural offer of the Lee Valley Regional Park and its venues; including the Lee Valley Ice Centre, the Lee Valley WaterWorks Centre and the Lee Valley Hockey and Tennis Centre, thereby ensuring their long-term sustainability and contribution to the visitor economy of the borough."

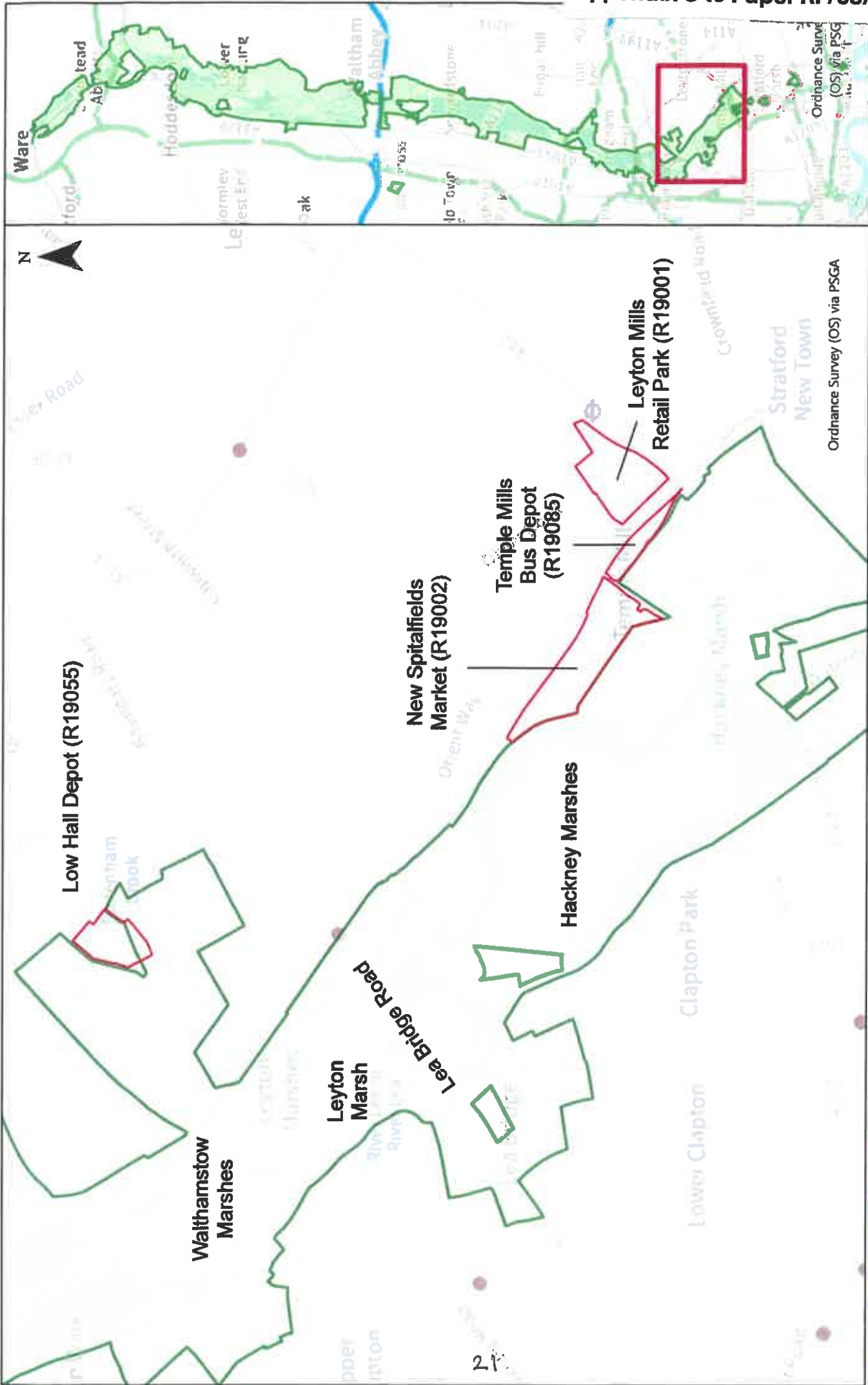
A Statement of Common Ground has also been proposed by officers of the LBWF as a mechanism to recognise the Authority's requirements in terms of delivering improvements and sustainable growth within its leisure and sporting landholdings and venues and to demonstrate a commitment to work with the Authority to achieve these aims, through a master planning and Development Performance process. Further discussions will be held between both parties to produce this document for submission to the Part 2 Site Allocations Examination.

The Authority looks forward to engaging further with Borough officers on the final stages of preparing the LP2 Site Allocations document for examination as part of the Duty to Co-operate process.

Yours sincerely

Claire Martin
Head of Planning

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London Borough of Waltham Forest Local Plan: Plan 2 - Site Allocations
(Leyton and Low Hall Area)

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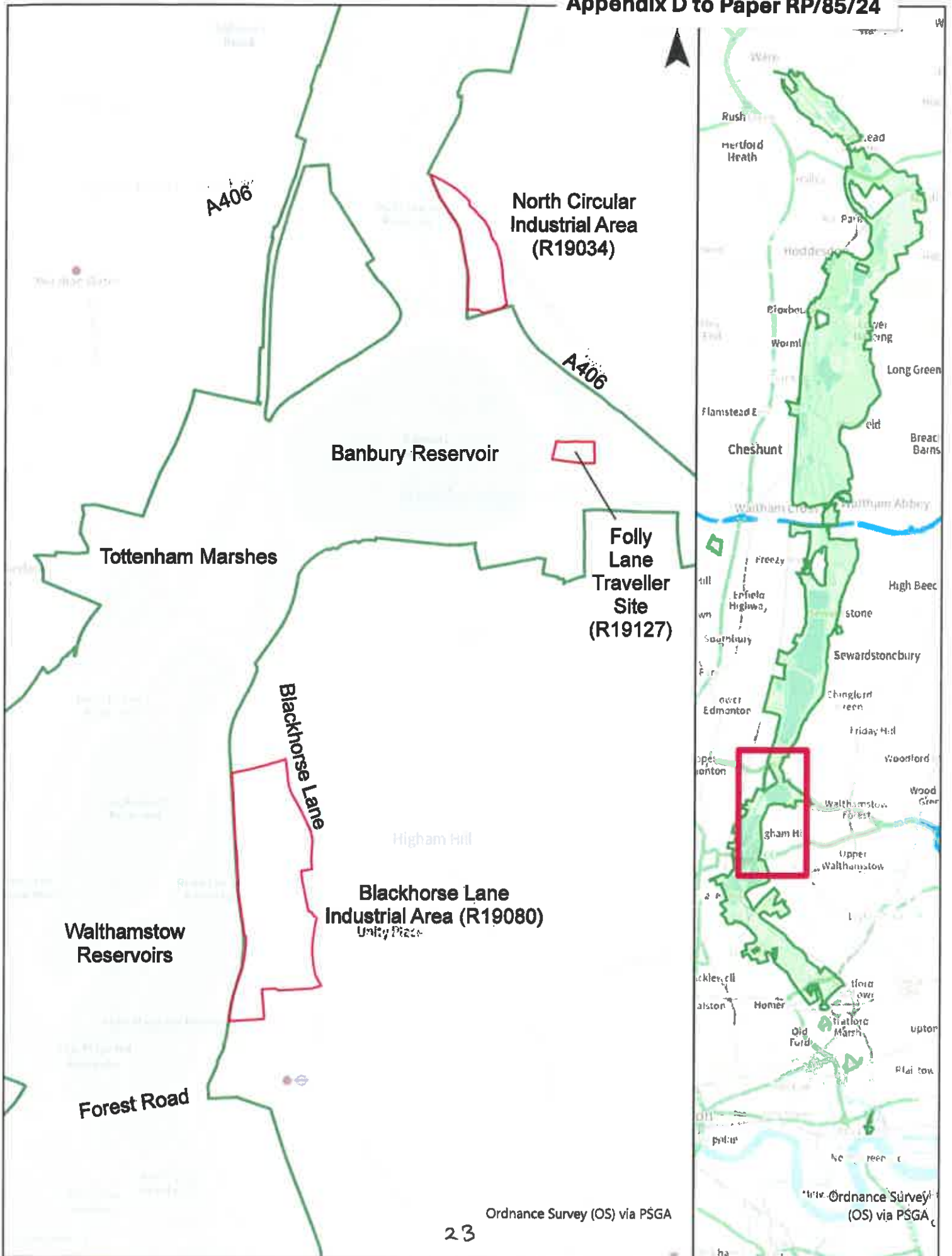
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 Park Boundary
 Site Boundary

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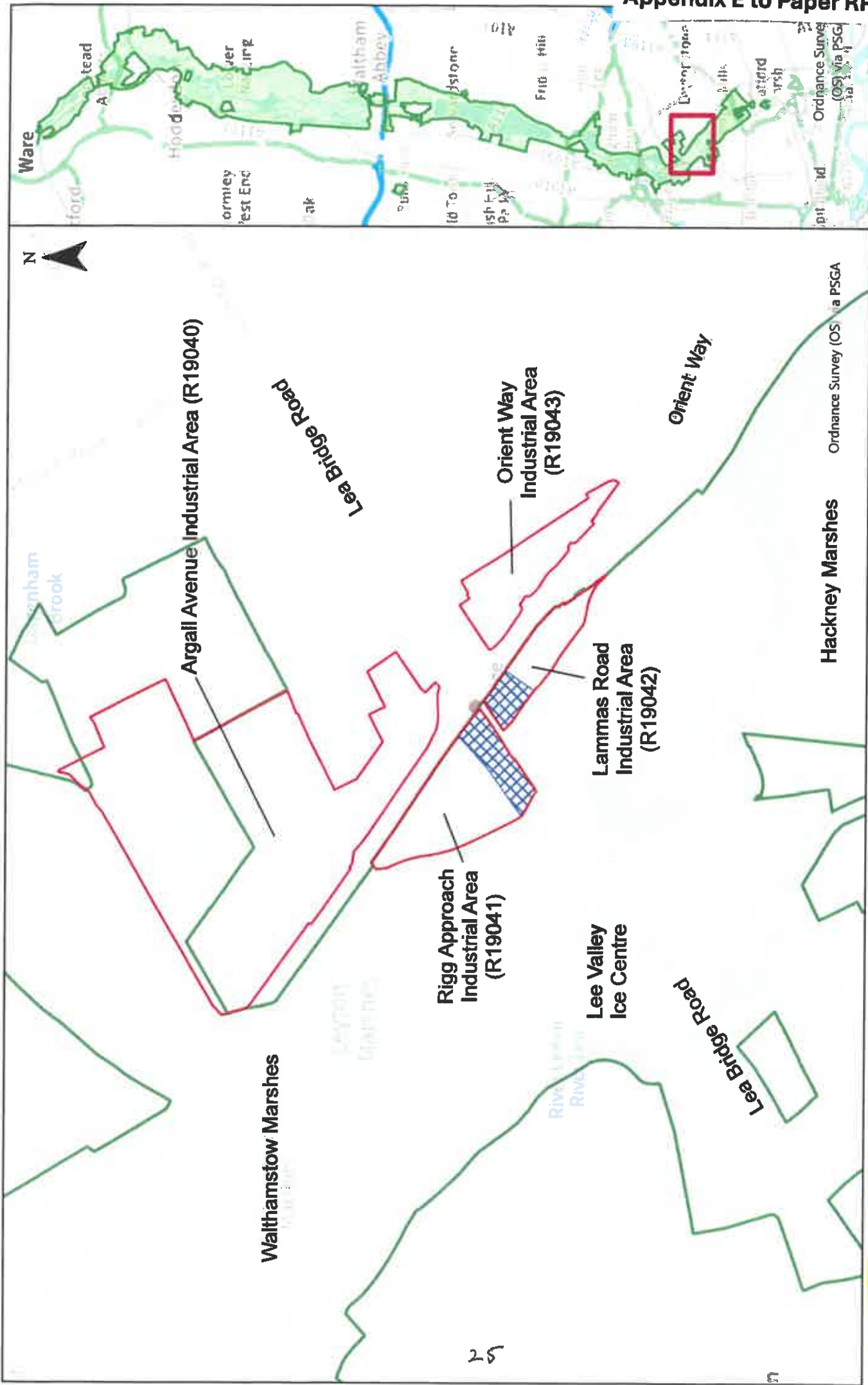


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London Borough of Waltham Forest Local Plan: Plan 4 - Site Allocations
(Lea Bridge Road Area)

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Legend:

- Site Boundary
- Park Boundary
- Area of Change



