

PLANNING CONSULTATION BY THE BOROUGH OF WALTHAM FOREST

**HYBRID PLANNING APPLICATION (PART DETAILED AND PART OUTLINE)
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 APPLICATION FOR THE CONSTRUCTION OF ONE 3 STOREY
BUILDING AND ONE 4 STOREY BUILDING (BLOCKS A1 AND A2) OF FLEXIBLE
INDUSTRIAL FLOORSPACE AND ONE MIXED-USE 18 STOREY BUILDING
(BLOCK B) COMPRISING 119 RESIDENTIAL DWELLINGS OF FLEXIBLE
INDUSTRIAL 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; AND**

**OUTLINE APPLICATION (ALL MATTERS RESERVED) FOR CONSTRUCTION OF
UP TO EIGHT DEVELOPMENT PLOTS (WITH MAXIMUM BUILDING HEIGHTS
RANGING FROM 22.6M A.O.D. (PLOT C), UP TO 145.0M A.O.D. (PLOTS D AND
H), COMPRISING UP TO 167,398SQM (GEA) RESIDENTIAL FLOORSPACE, UP
TO 14,824 SQM (GEA) OF FLEXIBLE INDUSTRIAL FLOORSPACE 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.**

Presented by Head of Planning

SUMMARY

A hybrid application (part detailed and part outline) has been submitted for the industrial-led mixed-use redevelopment of part of the Uplands Business Park and Forest Trading Estate at Blackhorse Lane. The site lies outside but adjacent and to the east of the Regional Park and Walthamstow Wetlands nature reserve. The proposed development includes 11 new urban blocks of varying scale and dimensions providing flexible industrial floorspace, residential and mixed use accommodation. Areas of new open space are also proposed within the indicative outline proposals – including the Wetlands Waterside park, positioned adjacent to the

Regional Park boundary along the Flood Relief Channel. The outline application is submitted with all matters reserved. A suite of development management documents; the Parameter Plans, Design Guidelines and the Development Specification set out the principles and overall framework for the future reserved matters applications that will seek approval for the detailed Appearance, Layout, Scale, Landscaping and Access of individual development plots.

The development proposed would be transformational with the existing largely 2 and 3 storey industrial area replaced by multiple high density buildings and industrial spaces offering a mix of residential, employment, commercial and community uses with heights ranging from 3 to 30 plus storeys. The visual impact on the views experienced by visitors to the Regional Park would be considerable but these views are already undergoing significant change due to recently completed high density development adjacent to the application site close to the Park. The proposed layout ensures the tall and taller elements are set well back from the Park edge and that the building line steps down towards the Park and the new Wetlands Waterside park. It is therefore proposed that no objection is raised to the current application provided that current layout and open space provision, the ecological mitigation and access links are secured by appropriate conditions and that suitable financial contributions are secured for Wild Marsh East at Tottenham Marshes to enable improvements to the open spaces and habitats to cope with future additional recreational footfall.

RECOMMENDATIONS

- Members Approve:
- (1) that the London Borough of Waltham Forest be informed that the Authority does not object to the proposed hybrid application provided that:
 - (a) the following elements of the Phase 2 outline application as set out in the Parameter Plans and Design Guidelines are secured by condition on any grant of consent;
 - (i) the set back of the development from the Regional Park to the east of the new open spaces and public realm, with a significant step down in building heights towards the new open spaces as shown in the Parameter Plans and Design Guidelines;
 - (ii) the inclusion of the Wetlands Waterside Park adjacent to the Flood Relief Channel and its connection south through to the Dagenham Brook as shown on the Public Realm Parameter Plan and Design Guidelines;
 - (iii) the provision of a north-south pedestrian/cycle route through the Wetlands Waterside Park and other connecting new open spaces to link with Blackhorse Road Station in the south and ultimately with Lockwood Way in the north
 - (iv) the full range of biodiversity and ecological mitigation measures and enhancements

resulting from the ecological assessments and the BNG calculations;

- (b) detailed Construction Environmental Management Plans for relevant phases of the development are produced and additional bespoke mitigation measures adopted during both the demolition and construction periods as recommended by the Environmental Statement and shadow HRA;
- (c) the following ecological enhancements are considered as part of the Phase 2 details:
 - (i) the de-culverting of the Dagenham Brook to form part of the wetland park;
 - (ii) installation of floating habitat rafts on the FRC (if agreed by the Environment Agency);
 - (iii) the installation of Kingfisher nest tunnels in suitable locations should also be included;

Officers would also expect the details of the on-going habitat management to be conditioned;

- (d) a detailed lighting strategy is produced for all phases of the development to be designed in accordance with the 'Institute of Lighting Professionals (2018), Bats, and Artificial Lighting in the UK Guidance Note 08/18'. This should ensure that the Flood Relief Channel, Dagenham Brook and reservoirs are retained as dark corridors and include post-construction controls;
- (e) a financial contribution is secured via a planning obligation/Section 106 legal agreement towards open space and habitat enhancements on Tottenham Marshes Wild Marsh East, in accordance with the Council's SANGS and any relevant revisions required and agreed with the Authority, to align with the timescale of the outline phase of the development;

A similar action would be supported for Douglas Eyre Playing Field, particularly if this could enable a new north south pedestrian link through the site alongside its western boundary. This would help deliver PDF Area Proposals for this area of the Park; and

- (2) that the London Borough of Waltham Forest be informed that the Authority would wish to be consulted on Phase 2 reserved matters applications in due course.

BACKGROUND

- 1 The application site lies outside and to the east of the Regional Park. It comprises 5.45ha of low-intensity industrial and employment generating floorspace known as the Uplands Business Park and Forest Trading Estate (Uplands site). It is accessed on its eastern boundary from Blackhorse Lane and on its southern boundary from Priestly Way. Please refer to the Plan at Appendix A to this report.
- 2 The western boundary is defined by the River Lee Flood Relief Channel (FRC), which also marks the boundary with the Regional Park, beyond which is Walthamstow Wetlands nature reserve, a designated RAMSAR site, and Site of Special Scientific Interest (SSSI). A controlled access into the Walthamstow Wetlands complex is provided a short distance to the north of the application site, via a bridge over the FRC known as the Lockwood Way entrance. This provides access onto a pathway along the eastern side of Lockwood Reservoir. Further north of Walthamstow Wetlands lies Wild Marsh East (WME), part of Tottenham Marshes. Please refer to the context plan at Appendix B. The southern tip of the application site intersects with a small section of Dagenham Brook, most of which is culverted.
- 3 Immediately to the north of the application site lie further industrial and employment areas, whilst south of the site, part of the industrial area around Blackhorse Road Station has been redeveloped. This has introduced residential-led mixed use developments including high-density, tall buildings into what was formerly a predominantly low-rise, industrial area.
- 4 The changes to the industrial character of this area are a result of its location within the Blackhorse Lane Strategic Industrial Location (SIL), part of the Upper Lea Valley Opportunity Area (as defined within the London Plan), the Blackhorse Lane and Northern Olympic Fringe Mayoral Housing Zone, and the Blackhorse Lane Mayoral Creative Enterprise Zone ('the CEZ'). The Council's Blackhorse Lane Area Action Plan (2015) has also been influential in this respect.
- 5 More recently collaborative working between the London Borough of Waltham Forest (LBWF), the GLA and landowners has seen the production of the Blackhorse Lane (BHL) SIL Masterplan Framework. This sets the context for this application and identifies opportunities to consolidate and intensify the existing industrial uses within new bespoke, fit-for-purpose buildings towards the north of the area, within the retained SIL boundary. This, in turn, is to enable the introduction of a mix of industrial, residential and associated commercial/community/cultural uses towards the south.
- 6 The Uplands site is important for creative businesses, food and beverage manufacturing, maker spaces and other small to-medium enterprises ('SMEs'). It is composed of 35 units of varying height up to 3 storeys, providing a total quantum of c.30,500sqm Gross External Area (GEA) floorspace of which 28,000sqm is industrial floor space. The buildings occupy approximately half the site with the remainder consisting of hardstanding, access roads, storage

yards and vehicle parking and some limited areas of soft landscaping. The estate is also home to an educational facility located in Uplands House, a two storey mid-century brick building fronting onto Blackhorse Lane.

DESCRIPTION OF PROPOSED DEVELOPMENT

- 7 This is a hybrid application seeking permission part detailed and part outline for the comprehensive redevelopment of the site comprising:

Phase 1 (Detailed):

- Demolition of all existing buildings within the Phase 1 Boundary, with the exception of Uplands House;
- Creation of 3 new urban blocks, one 3 storey and one 4 storey (Blocks A1 and A2) and one mixed-use 18 storey building (Block B) comprising:
 - 18,176sqm GEA of flexible industrial floorspace within Use Classes E(g)(ii and iii), B2 and B8;
 - 119 new homes falling within Use Class C3 of The Town and Country Planning (Use Classes) Order 1987 (as amended);
- Approx. 0.12ha (1,182sqm) of new public realm and open space (which excludes industrial streets) and 440sqm of new children's playspace;
- All associated hard and soft landscaping, infrastructure; and
- Provision of yard space vehicle and cycle parking.

Phase 2 Outline:

- Demolition of all existing buildings within the Phase 2 boundary;
- Creation of eight new development plots comprising:
 - Up to 14,824sqm GEA flexible industrial floorspace within Use Classes E(g)(ii and iii), B2 and B8;
 - Up to 167,398sqm of GEA residential floorspace;
 - Up to 5,000sqm GEA of flexible non-residential floorspace falling within Use Classes E, F1 and F2 and Sui Generis (Drinking Establishment/Bar);
- Approx. 1.8ha of new public realm and open space (which excludes industrial streets); and
- All associated vehicle and cycle parking, hard and soft landscaping, infrastructure and accesses.

The Illustrative Ground Floor Plan at Appendix C to this report shows an overview of the proposed development Phase 1 Detailed and the Phase 2 Outline.

8 Phase 1

This comprises 3 blocks; A1 and A2 and Block B which includes Uplands House (to which it is connected via a podium link) and the new industrial yard (Goldsmiths Yard). Blocks A1 and A2 are located in the north east corner of the site, bound by the Eden Girl's School to the north and west. The exact unit mix within these Blocks is to remain flexible at this stage to attract as wide a range of tenants as possible including those already on site.

- 9 Submitted drawings show that Blocks A1 and A2 can potentially be developed as a 'stacked industrial' typology, comprising larger-scale spaces at ground floor level (taking advantage of the steep fall in level from Blackhorse Lane towards the waters edge), medium-scale spaces at first and second floor levels, and smaller-scale spaces at third floor level within Block A2. Overall the majority of sites re-provision is provided in Block A; at 17,636sqm. Goldsmith Yard is positioned at the centre of Block A so as to facilitate more public-facing activities

during the evenings and at weekends.

- 10 Block B is located south of Block A and is to be developed as a mixed-use building which co-locates industrial floorspace, and new homes, a total of 119 residential units with 35% affordable (Build to Rent). The Block comprises a 'taller' element at 18 storeys (76.8m AOD) in height; and a podium accommodating ancillary uses and the car park entrance while also providing new amenity space for residents. Private amenity space is provided for all units in accordance with the Mayor's standards, (the Housing SPG 2016), in the form of balconies, podiums and gardens and 440sqm of children's playspace is proposed for age groups 0-15 in a range of spaces.
- 11 **Design, Public Realm Provision and Landscaping**
Block A rests on a dark brick plinth while the upper facades consist of grey fibre cement accentuated with burnt orange and grey metal detailing. The materiality of Block B is based on a red brick selection complementary to the retained Uplands House as well as the ground floor of Block A, while the infill podium is carried out in red aluminium reflecting the industrial heritage of the site.
- 12 Phase 1 proposals also include a scheme of hard and soft landscaping as part of the new public realm within Goldsmith Yard and along Goldsmith Street and Shakespeare Way. A variety of trees have been planted throughout the site while larger, strategically-placed landmark trees serve as focal points. This together with green roofs and podium gardens enables the site to achieve an Urban Greening Factor of 0.3, (broadly in line with the London Plan requirements (0.4 for residential and 0.3 for commercial). A number of these landscape elements have been designed to contribute to biodiversity for example through planting within SUDS rain gardens, choice of native plant species for the green walls and roof gardens and informal vegetation included in the Yard planting. A lighting strategy plan is included but a more detailed lighting scheme will be submitted at the appropriate design stage. Light spill to off-site areas and open spaces is to be avoided.
- 13 **Transport, Access and Parking**
A Transport Assessment accompanies the application. Vehicles will continue to use the existing and upgraded access via Goldsmith Street/Blackhorse Lane for Phase 1 of the scheme. Shakespeare Way will be closed off to vehicular traffic and become accessible for pedestrians and cyclists. Six yard areas are proposed, providing designated yard space for ground floor industrial units and shared yard space and goods lifts for industrial units on upper floors. The yard areas will provide parking and servicing facilities for the industrial units.
- 14 The residential element of the scheme is proposed to be car-free, with residential car parking provided for blue badge holders only. A total of 214 long-stay cycle parking spaces are proposed for the residential element of Phase 1, alongside 14 short-stay parking spaces. For the industrial element of Phase 1, a total of 257 long-stay and 54 short-stay spaces are provided. All residential car parking spaces will have active EV charging points and active EV charging points will be provided for commercial vehicles and electric bikes.
- 15 **Ecology Surveys Phases 1 and 2**
The Environmental Statement accompanying the application has assessed the likely effects of the development (both phases) upon biodiversity and ecology. It has been informed by a suite of ecological surveys, a shadow Habitats Regulations Assessment (sHRA), and a Biodiversity Net Gain (BNG)

assessment. Mitigation measures are identified, where appropriate, to avoid, reduce or offset any significant adverse effects identified and/or enhance likely beneficial effects. In addition, a number of measures and enhancements are proposed and included in the Design Guidelines, to ensure that the proposed development delivers a significant BNG across the site. Although based in part on the indicative Phase 2 proposals there is confidence that a 10% BNG can be achieved. It is understood that Natural England (NE) have provided advice on the extent of the survey work and the design details of the proposed development as it has evolved over a series of pre-app meetings.

- 16 The detailed sHRA has also taken into account potential significant effects arising during the demolition and construction phases on the Lee Valley SPA/Ramsar site/Walthamstow Reservoirs SSSI. Potential impact pathways that have been assessed include disturbance to faunal populations associated with the designated sites via visual, noise, lighting and dust/pollutants and recreational pressure. Wintering bird surveys, have been undertaken to ascertain whether wetland and wading birds (including those which represent qualifying features of Lee Valley SPA/Ramsar site) fly over the Uplands site at present, to assess any potential risks associated with bird strike. In summary, surveys identified the vast majority of wetland bird movements to be exclusively within the boundaries of the SPA/Ramsar site, with birds typically flying in a north/south direction over the designated site.
- 17 **Phase 2 Outline**
The outline element of the application is accompanied by a suite of 'Development Management Documents' comprising: the Design Guidelines; Parameter Plans; and the Development Specification. These provide the overall framework for the future reserved matters applications that will seek approval for the detailed Appearance, Layout, Scale, Landscaping and Access of individual development plots. Eight development plots (Blocks C, D, E, F, G, H, J and K) are proposed in Phase 2, as shown in Appendix C. In line with the BHL SIL Masterplan Framework the industrial re-provision for Phase 2 will be directed towards Blocks E, J and K which sit within the eastern half of the site – i.e. furthest from the Park boundary.
- 18 The Planning Statement explains that the layout of Phase 2 has been informed by the 'three north south contextual lines' that characterise the existing site: namely, Blackhorse Lane to the east; the Waterfront adjacent to the FRC and the Walthamstow Wetlands to the west; and running diagonally through the centre of the site the 22.5m exclusion zone above the Thames Water Spine Tunnel and which is currently built over by low rise sheds. The proposed development seeks to preserve and enhance these three lines by activating the street frontage on Blackhorse Lane, introducing a series of connected yards and public spaces along the Thames Spine Tunnel Exclusion Zone and creating a linear, green route along the currently inaccessible water's edge within the Uplands site. This will ultimately secure connections with existing waterside routes north of the Walthamstow Wetlands Lockwood Way entrance and in the south with the new pedestrian route through to Ferry Lane.
- 19 **Layout and Indicative Scale**
Block C is a small and narrow industrial building located on the eastern edge of the site, furthest from the Regional Park. Block D is located in the north-western part of the site and will front onto the 'Wetlands Waterside' a new public waterside space proposed adjacent to the Flood Relief Channel. It is expected to accommodate one 'taller' and one 'tall' element (max building height of 145m

(AOD) – approx. 30 plus storeys) to provide a positive sense of enclosure on to the key public spaces.

- 20 Block E (max height set at 110.2m (A) approx. 26 storeys) is a mixed-use block in the north-eastern part of the site expected to co-locate industrial, and non-industrial uses. Block F a mixed use-block in the western part of the site is defined by Wetlands Waterside park to the north, and the Wetlands Terrace to the west. It sits closer to the Regional Park boundary with Blocks G and H to the south. It includes new bars and restaurants with frontage on to Wetlands Yard and a terrace overlooking Wetlands Waterside, with residential above including a 'taller' building, max height of 72.4m (AOD) approx. 17 storeys.
- 21 Blocks G and H form a large mixed-use block in the south-western part of the site. At the centre is Dagenham Walk, a community-focussed public space forming the southernmost link to the series of new public spaces along the exclusion zone of the spine tunnel. To the south, is Dagenham Brook a new strategic east west connection to Blackhorse Lane. A key gateway into the site is proposed where these public spaces meet to be fronted by Block H, the tallest building within the illustrative masterplan at 145m (AOD) approx. 30 plus storeys. Block G has a max height of 51m (AOD) approx. 12 storeys.
- 22 Block J is a mixed-use block in the centre of the site and is expected to accommodate two 'tall' elements at 110.2m (AOD) approximately 25 storeys, and provide a positive sense of enclosure on to the key public spaces of Uplands Yard and Wetlands Yard. Block K is located in the south-eastern part of the site proposed as either a co-located industrial and non-industrial block or as a stacked industrial building similar to those proposed in Block A.
- 23 It is proposed that Phase 2 will provide up to 14,824sqm GEA flexible industrial floorspace. This will enable it to respond to market demand at the time of completion and to the retention and relocation of existing businesses. Phase 2 also proposes up to 167,398sqm (GEA) of residential floorspace; this equates to approx. 1,671 residential units. The illustrative masterplan demonstrates that up to 55% of family sized homes can be provided in the low-cost affordable rented element, with 35% as affordable housing, alongside a wider mix of private and intermediate homes. Approval is also sought in outline for up to 5,000sqm GEA of flexible non-residential floorspace. This will mainly be provided within units fronting onto the public yards and other key public spaces such as Wetlands Waterside, in order to help frame and activate each space.
- 24 **Public Realm, Wetlands Waterside and Other Open Space**
The illustrative masterplan indicates that 2.49ha (over 60%) of Phase 2 could be delivered as communal amenity and open space, of which the Wetlands Waterside park at 6,600sqm is the most significant. Please refer to Appendix D to this report the public realm parameter plan. This is proposed as a new waterside space for existing and future residents and wider Blackhorse Lane community, aimed to accommodate various recreational activities, play, and event space below the level of the bund separating the FRC and the Walthamstow Wetlands (WW). It incorporates an upper level terrace which will provide opportunity for views of the WW above the bund. The proposed landscape treatment includes variegated stretches of wildflower meadows; small copses and woodland areas; lawned, partly mounded areas; and elements of natural play. Please refer to the illustrative images included at Appendix E to this report. A shared north-south cycleway and footpath running through this space will in time connect this space with the Lockwood Way entrance to WW in

the north and in the south with the Blackhorse Rd station.

25 Other proposed open spaces comprise the following:

- Dagenham Brook (1,670sqm) a green neighbourhood space which would also be linked into the north south pedestrian cycle route.
- Podium Courtyards (4,823sqm)
- Roof Terrace (4,348sqm)
- Yards (4,575sqm) providing community spaces for activities, door step play, with pollinator planting, multistem trees and provision for SUDs
- Other Public Amenity areas (2,853sqm)

The publicly open spaces, which exclude the podium courtyards and roof terraces, would amount to 1.8ha (over 45%).

26 Landscaping and Biodiversity

The illustrative biodiversity and landscape scheme includes a number of measures to increase biodiversity, including species rich wildflower meadows proposed for Wetlands Waterside, areas of semi-natural broad-leaved woodland with primarily native understory planting, large areas of vegetation planted with nectar plants in the communal gardens and roof terraces, green roofs, and creation of additional habitats such as bat and bird boxes, invertebrate habitats and hedgehog shelters. The feasibility of a line of floating wetland vegetation within the FRC is being investigated with the Environment Agency.

27 Access

The primary point of access for vehicles will continue to be from Blackhorse Lane (via Phase 1), and the network of streets, routes and spaces proposed for Phase 2 will connect to those established in Phase 1. A series of dedicated pedestrian and cycle routes are also to be provided including the new waterside route within Wetlands Waterside. The Planning Statement explains that the exact numbers of and locations for car parking and cycling spaces will be secured at the reserved matters stage in accordance with policy requirements.

POLICY CONTEXT

28 London Plan

The Uplands site sits within the Lee Valley Opportunity Area (LVOA), identified as an area for higher density development under Policy SD1 'Opportunity Areas' in the London Plan 2021. Supporting text makes reference to the need to protect and improve sustainable access to the Lee Valley Regional Park and reservoirs, as part of any future planning framework for the LVOA.

29 The London Plan also identifies the site as forming part of the Blackhorse Lane SIL, to be managed proactively as London's largest concentrations of industrial, logistics and related capacity for uses that support the functioning of London's economy, Policy E5. Both the site and wider Blackhorse Lane SIL fall within the Blackhorse Road and Northern Olympic Fringe Mayoral Housing Zone, which is identified as having an indicative capacity of 2,477 new homes. Tall buildings are addressed by Policy D9. This requires Boroughs to take a plan-led approach to density and the inclusion of tall buildings.

30 Local Plan

In the LBWF's emerging Local Plan 'LP1' (currently at an advanced examination stage) the application site is located within the Blackhorse Lane Strategic

Location, which is expected to provide a minimum of 1,800 new homes. It is also located within the Blackhorse Lane Creative Enterprise Zone (CEZ), which encourages the growth of workspace, cultural uses and the delivery of creative jobs. Strategic Locations are identified for transformational change and considered capable of accommodating taller (14-17 storeys) and tall buildings (18+ storeys) as part of proposed development, (LP1 Policies 8 and 57). The Council's published BHL SIL Masterplan Framework, confirms the application site is located within an area suitable for a number of taller and tall buildings together with substantial new public realm.

- 31 The application site also forms part of Site Allocation 'SA69' as identified within the Waltham Forest draft Local Plan Part 2, the LP2 'Site Allocations' document. The allocation is identified as having capacity for up to 81,000sqm of industrial capacity and 2,300 new homes. The designation also seeks to improve pedestrian and cyclist experience and safety inside the site and along Blackhorse Road; and deliver a route with meaningful open space along the Wetlands.
- 32 **SANGS**
As part of their Local Plan, the LBWF has developed a Sustainable Alternative Natural Green Space Strategy (SANGS). This will be included within a wider Waltham Forest Green Spaces and Places SPD in due course. SANGS are areas that are designated with the aim of protecting a Special Protection Area (SPA), a Site of Special Scientific Interest (SSSI) or Special Area of Conservation (SAC) from recreational pressures by providing alternative green space to attract people away from sites that need protecting.
- 33 The LBWF SANGS has been produced to ensure the level of growth promoted through the emerging Local Plan will not result in adverse effects on the integrity of the Epping Forest SAC and SSSI as a result of recreational pressure. In collaboration with NE, the City of London Conservators, and more recently the LVRPA, the LBWF have developed a bespoke SANG methodology to calculate the uplift in visitor numbers that could be expected from planned growth in the borough. The new SANGS identifies the greenspaces in the borough that should be designated as SANGs to accommodate this uplift and mitigate recreational pressures on the SAC. This includes sites both owned by the Authority and under its remit as a statutory body.
- 34 The new strategy sets out the investment that would be needed in these spaces to meet the requirements of SANGs and accommodate the identified uplift in visitor numbers. This investment (including a component for maintenance) would be funded through the Community Infrastructure Levy, along with other sources of funding where appropriate, and makes clear commitments for ongoing monitoring and governance. Officers of the Authority have fed in relevant indicative Park projects as they relate to sites within Waltham Forest. The SANGS is now under consideration as part of the Local Plan examination.
- 35 The draft SANGS includes two areas within the Regional Park that are within the required 15min walking distance catchment for the Blackhorse Lane Strategic Location. These are Wild Marsh East (WME) part of Tottenham Marshes which is owned by the Authority and the Douglas Eyre Playing Field.
- 36 **Park Development Framework**
Park Development Framework (PDF) Area 3 Proposals 'Walthamstow Wetlands and Tottenham Marshes' are relevant to the application. Visitor proposals 3.A.1

'Walthamstow Wetlands' aim to ensure the provision of public access into and around parts of the Wetlands site are managed so as to minimise disturbance to the wildlife and habitats whilst providing access to the varied wildlife on site. Proposals support the provision of secondary pedestrian entrances that will help re-connect the Reservoirs with the adjoining and wider Park area including in the north via Lockwood Way through to Tottenham Marshes and options to link through to the south on the eastern boundary of the reservoirs and/or close to the FRC. Continuation of this pedestrian/cycle pathway further south through alongside the western boundary of the Douglas Eyre Playing Field is also identified (3.A.3). Biodiversity proposals (3.A.4) identify the need to protect Tottenham Marshes as an important urban wildlife habitat and nature reserve with further work undertaken to improve biodiversity and enrich the wildlife value.

- 37 The PDF Strategic Policies address development outside the Regional Park boundaries. Policy E2 states that development which could adversely impact on its amenity "will be resisted or planning obligations sought in line with other policies within this Plan". Policy D3 promotes partnership work with riparian authorities to ensure that the design and layout of new development on sites adjacent to its boundary "enhances the Park avoiding detrimental impact on its ecological and heritage assets."
- 38 The Lee Valley Regional Park Landscape Strategy highlights the importance of protecting areas where open skylines predominate and maintaining the valued qualities of the area 'LCA B3 Walthamstow Wetlands' such as the sense of openness, as well as improving integration (physical, functional and visual) with the surrounding areas. Connections with surrounding communities within Waltham Forest and Haringey should be improved to enable access between different parts of the Lee Valley which are currently severed from each other.

PLANNING APPRAISAL

39 Principle of Development

The hybrid application site sits outside the Regional Park. It forms part of an established industrial and employment generating area and as such the principle of an industrial led, mixed-use redevelopment of the site is acceptable, and is supported by regional and local plan policy.

- 40 Phase 1 the detailed application, (set further back from the Park behind other buildings) sets a standard for and provides an indication of the design and scale of the outline Phase 2 component (adjacent to the Park boundary and FRC). The details for Phase 2 will be developed in accordance with the masterplan framework, guided by a suite of documents – the Design Guidelines, Parameter Plans and Development Specification which have been submitted as part of this application. The Phase 2 application also provides a number of indicative and illustrative images including an illustrative masterplan layout (reproduced as Appendix C to this report) which are helpful in relation to assessing the potential impacts of the development as a whole upon the Park. The principle issues of relevance to the amenity, recreational use and ecology of the Regional Park are considered to be:

- Visual impacts in terms of scale and layout of development
- Open space provision and recreational impacts on the wider Park
- Impacts on ecology

41 **Visual Impacts**

The applicant has demonstrated how the overall layout of the development is informed by 3 main site characteristics namely; the area of waterfront to the west alongside the Flood Relief Channel, proposed as a new public open space 'Wetlands Waterside'; Blackhorse Lane to the east and the Thames Water Spine Tunnel exclusion zone, which has been used to form a series of connected yards, public spaces and areas for play and community activities. These features have assisted in setting back the development from the edge of the Regional Park and the boundary with Walthamstow Wetlands, and allow the tall and taller elements to be placed towards the centre of the site so that the massing steps down towards the Regional Park and the Walthamstow Wetlands. The taller building, Block B, within the detailed component at 18 storeys, is also positioned well back from the Park.

- 42 The height of the tall and taller buildings will still be prominent in views out across to the east from within the Regional Park and the Walthamstow Wetlands complex, particularly given the parameters set for the height of plot H in the outline application, at 145m (AOD) or approx. 30 to 34 storeys. To a large extent however these views have already been altered by the significant changes that have taken place immediately adjacent and to the south of the application site. A series of developments and multiple high density buildings have been recently completed, offering a mix of residential, employment, commercial and community uses. These buildings range in height from 3 to 18 storeys. The Heritage, Townscape and Visual Impact Assessment (THVIA) has concluded that in views from the Walthamstow Wetlands looking across the water:

"The Proposed Development will be seen alongside other large residential buildings recently developed to the south, forming part of a cluster of residential, industrial and mixed-use development leading north from Blackhorse Road station, helping to identify this area a location for significant transformation and regeneration."

- 43 Significant changes to the scale of the proposed development such that they would not impact upon views would be difficult to argue or achieve given the precedent set within the locality and the policy position which recognises the area as one suitable for transformational change. The reserved matters detail for the outline component will be guided by the Parameter Plans, which set the max heights (to include parapets, plant rooms etc) for the tall and taller elements, and a suite of detailed Design Guidelines which set the requirements to be delivered as part of the future design development. These are comprehensive and will assist in defining the visual impact. They include specific guidance for tall and taller buildings, their architectural and design quality, their collective significance, the choice of materials (brick and masonry as the primary materials in a limited palette of reds and grey), orientation, and avoidance of glare.
- 44 The manner in which these Design Guidelines are translated onto the built form will however be a matter for consideration at a detailed reserved matters application stage should permission be granted by the LBWF. The Authority should be consulted on these details if the application proceeds to the detailed stage.

45 Open Space and Recreational Impacts

The proposed development includes a range of new public realm provision which the applicant has demonstrated as policy compliant. This is provided across both the detailed phase (0.12ha as open space, rising to 0.25ha if the shared amenity within Block B podium is included) and outline phase which includes 2.49ha of which 1.8ha is public open space. This includes a new park, the Wetlands Waterside, to be delivered under reserved matters, as well as a series of landscaped open spaces, new treed areas of lawn, play spaces, and green links for pedestrians and cyclists.

- 46 The range of open spaces and proposed landscape treatments are supported. They will provide a new resource adjacent to the Regional Park and Walthamstow Wetlands to cater for the recreational needs of new residents. The delivery of the quantum and quality of open space provision proposed within Phase 2 outline is of particular importance, as the Wetlands Waterside park offers opportunities for a range of recreational activity similar to that found within the Regional Park. It will connect to the Wetlands Yard and Dagenham Brook open spaces and other public realm and this will enable provision of a shared pedestrian and cycle route through the site from north to south with links to the east onto Blackhorse Lane via the Phase 1 area. This opens up the potential to make further connections on adjoining sites to create a link from the application site through to the Lockwood Way entrance into Walthamstow Wetlands (and potentially at some future point through to Tottenham Marshes in the north), and in the south, link through to the Blackhorse Rd station facilitating visitor access to the Regional Park.
- 47 The detail provided by the applicants in the Design and Access statement and illustrative plans is noted. This is captured in the Parameter Plans and the key requirements set out within the Design Guidelines and provides a level of reassurance as to the quality and quantum of open space proposed. The open space/public realm elements of the Phase 2 outline application as set out in the Parameter Plans and Design Guidelines should be secured by condition on any grant of consent and the Authority consulted on the reserved matters applications for open space, public realm and landscape provision. Scope for the de-culverting of the Dagenham Brook to form part of the new Wetlands Waterside park should also be explored.
- 48 Notwithstanding the open space provision proposed as part of the application the significant levels of new residents and employees will place increased recreational pressure on the adjacent areas of the Regional Park. Various sites are within a short walking and cycling distance from the development, namely Wild Marsh East, Walthamstow Wetlands and potentially in the south, the Douglas Eyre Playing Field. The approach towards the avoidance and mitigation of potential recreational effects to the Lee Valley SPA/Ramsar site (and Epping Forest SAC) in the Environmental Assessment (ES) and sHRA report raises some issues over whether the impacts will be transferred across to areas of the Regional Park. It proposes that all new residents will be provided with an information pack that promotes on-site open space for recreational activities, raises awareness of the sensitivity of designated sites in the local area (specifically the SPA / Ramsar site and SAC) and encourages the use of "less sensitive areas nearby, such as the wider Lee Valley Park".
- 49 The LBWF SANG strategy has also identified Wild Marsh East (part of Tottenham Marshes) and the Douglas Eyre Playing Field as SANGs (i.e within the required 15min walking distance catchment). These sites are needed to

accommodate the uplift expected from proposed growth within the Blackhorse Lane Strategic Location and mitigate recreational pressures on the SAC. The Authority's indicative projects for open space and habitat improvements on Tottenham Marshes WME have been incorporated into the SANGS alongside those proposed by LBWF. Indicative costings calculated by LBWF of £744,097 for their delivery and maintenance are included but these run over the timeframe of the Local Plan through to 2035.

- 50 Should planning consent be granted for the current scheme, Officers would expect, given the ES and sHRA mitigation recommendations and the SANGS position, a planning obligation to be secured with contributions towards investment in Tottenham Marshes WME aligned with the timescale of the outline phase of the development. The applicant has indicated in the ES that a proportionate financial contribution towards the improvement of alternative greenspaces in the local area would be acceptable secured in line with a Section 106 legal agreement prior to the occupation of each phase of the Development. The project details would need to be agreed in line with the SANGS and any relevant revisions given the timescales likely to be involved. A similar action would be supported for Douglas Eyre Playing Field, particularly if this could enable a new north south pedestrian link through the site alongside its western boundary. This would help deliver PDF Area Proposals for this area of the Park.

51 **Impacts on Ecology**

The ecological assessments undertaken as part of the application process have concluded that the site is of limited ecological value which is to be expected given the largely industrial nature of the site. The detailed scheme and the Design Guidelines incorporate a number of mitigation measures and enhancements proposed as a result of the ecological assessments and the BNG calculations (these are paraphrased in italics below). These are supported and will need to be secured by conditions should the application be granted. They cover matters that Officers would seek to secure in relation to a development adjacent to the Park, in particular:

- *'the inclusion of a lighting strategy aimed at minimising light spill and pollution'*. Any lighting strategy should be designed in accordance with the 'Institute of Lighting Professionals (2018), Bats, and Artificial Lighting in the UK Guidance Note 08/18'. There should be condition for a detailed lighting design scheme for all phases of the development – the FRC, Dagenham Brook and reservoirs should be retained as dark corridors. This may require some post-construction controls.
- *'installation of bat and bird boxes on the new buildings, and establishment of invertebrate features in suitable locations'*. The proposals offer considerable scope for the inclusion of multiple integrated bat and bird boxes on all the buildings of all the phases of development.
- *'The provision of extensive areas of species-rich habitats within the site, including wildflower grassland, trees, scrub and ornamental planting, rain gardens, hedgerows, climbing plants and green roofs'*. The new planting/landscaping proposals will add extra value for biodiversity, the emphasis should be to use of native planting.

- *'The open spaces designed for informal recreation within the Wetlands Waterside Park are positioned at a lower level than the reservoirs, in order to ensure that they are screened by the existing bund associated with the River Lee Flood Relief Channel and reservoir and that visual impacts and other potential effects (such as noise) are minimised as a result'.* This is noted and set out in the Design Guidelines, but will need to be secured as part of the reserved matters application for Phase 2.
- *'treatment of building fascias – particularly those associated with the western site boundary – to include features such as balconies and other external treatments to reduce the potential for glare, minimise reflective surfaces and, in turn, reduce the potential for bird strikes'.* It is noted that as a result of the sHRA related bird flight surveys, the risk of potential effects arising due to bird-strike and disruption to flight lines is considered to be negligible. It will remain important however to ensure that the parameters specified for the Outline scheme where tall buildings are set back from the western boundary and surrounded by shorter buildings are adhered to in order to further reduce any potential risk from bird strike should birds fly across in a west to east direction.
- *'screening and cleaning of surface water prior to discharge off-site to prevent any potentially contaminated surface run-off.'* This is supported.

- 52 The ecological assessment and sHRA work has also taken account of the potential effects on the Lee Valley Ramsar site/SPA/Walthamstow Reservoirs SSSI arising during the demolition and construction phases and from the completed development. As a result detailed CEMPs for relevant phases of the Development will be produced and additional bespoke mitigation measures will be adopted during both the demolition and construction periods. In particular for construction work located close to the western part of the Site for example, acoustic screening of static plant to mitigate for noise impacts will be undertaken together with the use of alternative quieter machinery and restricting certain activity to set times, avoiding the most sensitive period of November to February inclusive. The CEMP will be an essential tool in mitigating impacts, and the effectiveness of these mitigation measures on bird species should be monitored with a monitoring plan and timetable established by the developers ecologist prior to construction taking place.
- 53 Once completed the type of noise effects likely to arise as a result of the proposed development are anticipated to be broadly similar to the existing situation, with continued industrial use largely focused in the eastern part of the Uplands site in addition to noise associated with residential use. As stated above noise associated with the recreational use of the Wetlands Waterside Park would be at low levels and screened by the existing bund along the eastern boundary of the Ramsar/SPA site.
- 54 Officers consider that further ecological improvements could be made and the installation of floating habitat rafts on the FRC would be welcomed (if agreed by EA). The installation of Kingfisher nest tunnels in suitable locations should also be included. Officers would also expect the details of the on-going habitat management to be conditioned. All species and habitat data gathered during the development of the planning application should be sent to the LERC (GiGL).

55 Conclusion

The principle of the redevelopment of part of the Uplands Business Park and Forest Trading Estate is not controversial in policy terms. The visual impact of the proposed development is however considerable in relation to the impact on views out to the east that might be experienced by visitors from within the Park. These views are however already compromised and are undergoing significant change as a result of recently completed high density development adjacent to the application site and the Regional Park which has set a precedent. Whilst the height of individual buildings proposed in the outline phase 2 are of concern the overall scheme ensures the tall and taller elements are set well back from the Regional Park edge and that the building line steps down towards the Park and the new Wetlands Waterside park and other open spaces. The space allocated to new open space and the reductions in building heights should be secured via conditions on any grant of consent with reference to the Design Guidelines and Parameter Plans.

56 Likewise the ecological mitigation proposed as part of the application will need to be secured via conditions and demonstrated in the details submitted as reserved matters applications. The Authority should be consulted on the detail of Phase 2 in due course

57 Finally the Authority should seek proportionate financial contributions towards the improvement of WME in line with the LBWF SANGS to be secured in line with a Section 106 legal agreement to align with the timescale of the outline phase of the development A similar position would be supported for contributions towards Douglas Eyre Playing Field.

ENVIRONMENTAL IMPLICATIONS

58 These are addressed in the body of the report.

FINANCIAL IMPLICATIONS

59 There are no financial implications arising directly from the recommendations in this report.

LEGAL IMPLICATIONS

60 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 Park Act). The Park 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.

61 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

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

EQUALITY IMPLICATIONS

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

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BACKGROUND REPORTS

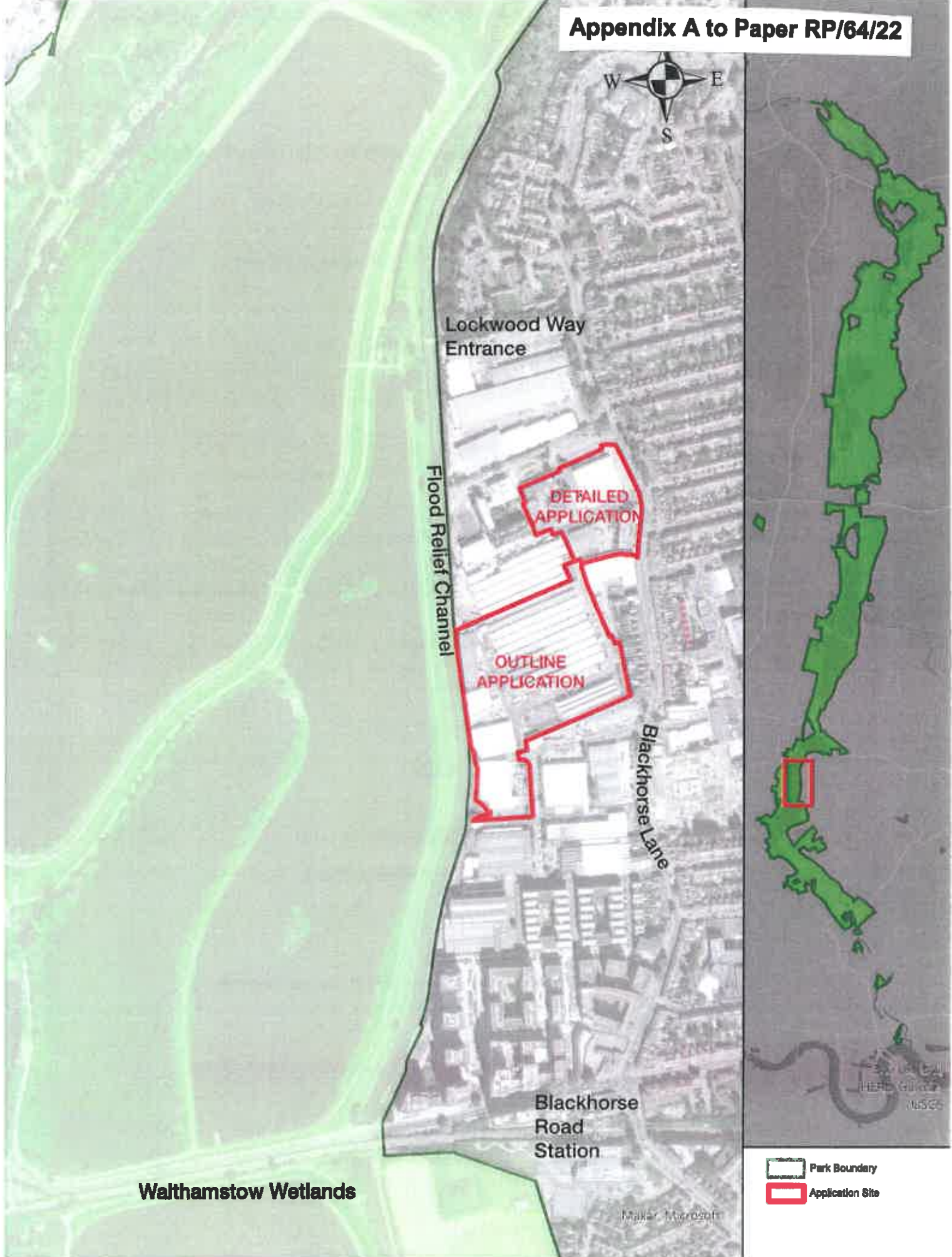
Planning consultation by London Borough of Waltham Forest 10 Oct 2022

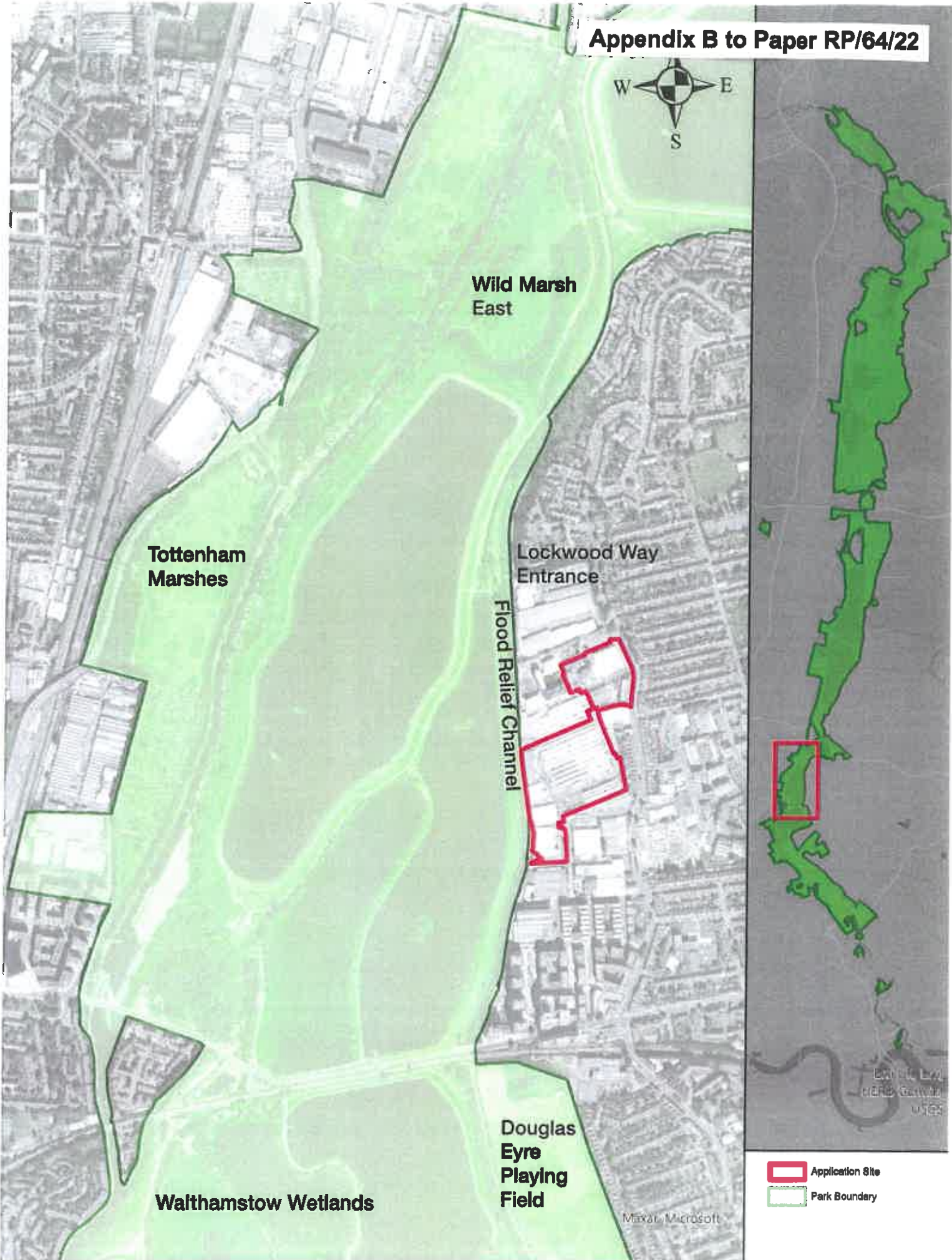
APPENDICES ATTACHED

| | |
|------------|--|
| Appendix A | Plan of the application site |
| Appendix B | Context plan showing Regional Park in relation to development site |
| Appendix C | Illustrative Ground Floor Plan |
| Appendix D | Public Plan Parameter Plan |
| Appendix E | Illustrative views of Wetlands Waterside park |

LIST OF ABBREVIATIONS

| | |
|--------------|--|
| FRC | Flood Relief Channel |
| SSSI | Site of Special Scientific Interest |
| WME | Wild Marsh East |
| SIL | Strategic Industrial Location |
| CEZ | Creative Enterprise Zone |
| LBWF | London Borough of Waltham Forest |
| BHL | Black Horse Lane |
| SME | Small to Medium Enterprises |
| AOD | Above Ordnance Datum |
| GEA | Gross External Area |
| SUDS | Sustainable Urban Drainage Systems |
| EV | Electric Vehicle |
| sHRA | Shadow Habitats Regulations Assessment |
| BNG | Biodiversity Net Gain |
| SPA | Special Protection Area |
| WW | Walthamstow Wetlands |
| LVOA | Lee Valley Opportunity Area |
| SANGS | Sustainable Alternative Natural Green Space Strategy |
| SAC | Special Area of Conservation |
| NE | Natural England |
| PDF | Park Development Framework |
| THVIA | The Heritage, Townscape and Visual Impact Assessment |
| ES | Environment Statement |
| CEMP | Construction Environmental Management Plan |
| the Park Act | Lee Valley Regional Park Act 1966 |





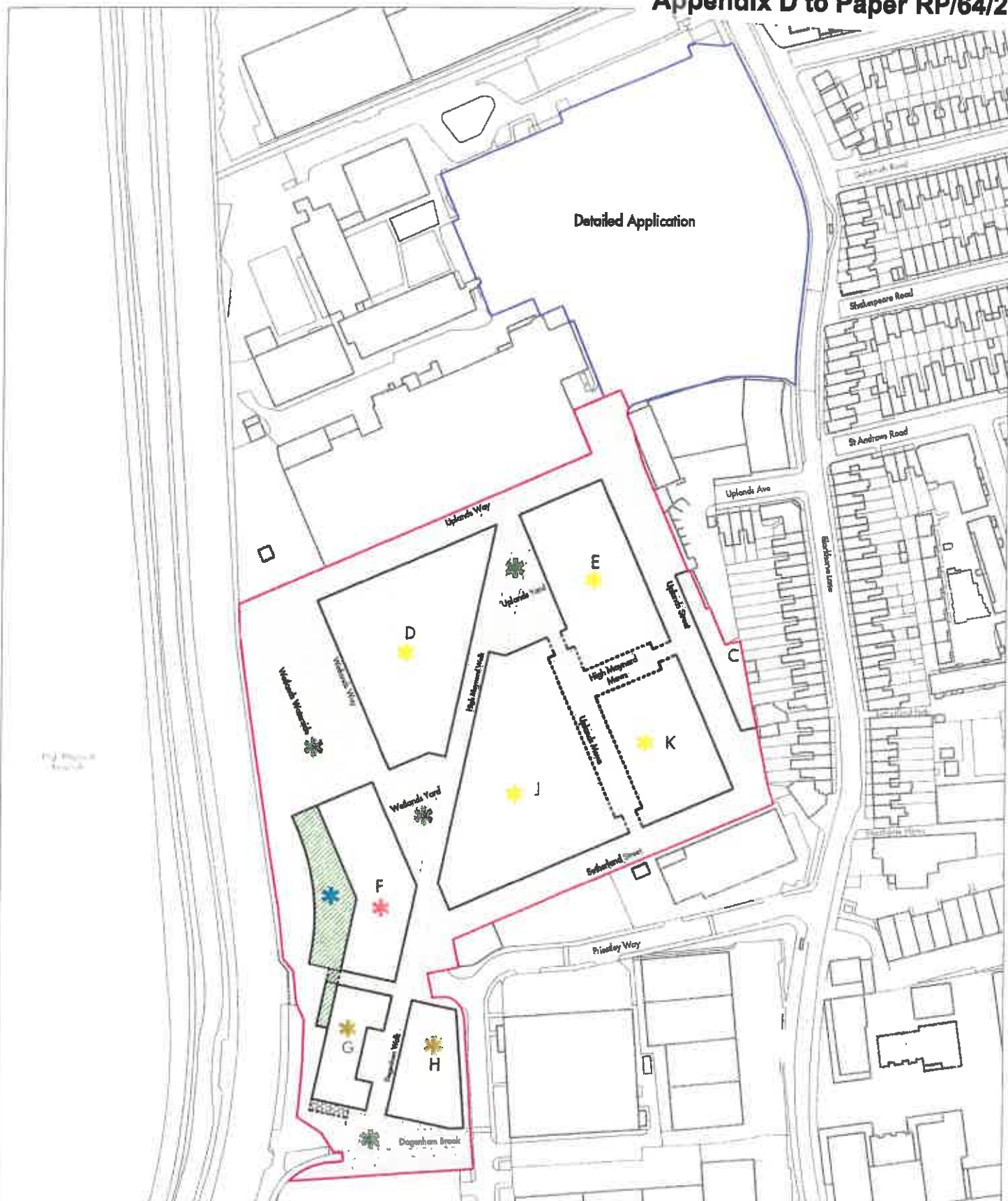


20

- Restaurants/Cafe - R4
- Hotel - H4
- Industrial - I2 | I3 | I4(I2)
- Industrial (Manufacturing) - I2 | I3 | I4(I2)
- Dwelling and Residential Mass - C3
- Residential Auxiliary - C3
- Community Mass - F | F2 | F3 | F4 | F5

Offices/Business
 1000-1500
 1500-2000
 2000-2500
 2500-3000
 3000-3500
 3500-4000
 4000-4500
 4500-5000
 5000-5500
 5500-6000
 6000-6500
 6500-7000
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 9500-10000

Illustrative Only
 2024 Planning Application
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 9000-9500
 9500-10000



NOTES

- Refer to Development Specification for further description of this plan, how it is to be secured by condition, and the quantum that applies.
- Refer to Development Specification for details on other structures and /or utilities equipment
- Refer to Design Guidelines for further description of this plan, particular guidelines and principles for the Development.
- Street and place names are working titles only.
- Public Realm extent is related to Building lines and may be adjusted together. Refer to Parameter Plan drawing 19029_AAM_00_07_013 and 19029_AAM_00_07_013 for limits of deviation for each Development Plot.

KEY LEGEND

- Outline Application boundary
- Detailed Application boundary
- Thomas Water Spline Tunnel and Dagenham Brook Exclusion Zones
- Development Plot Maximum Building Line
- Single story public open terrace development zone
- Terrace link over ground level allowed
- Undercroft public open space at ground level required if building lines extend over the area delimited
- Indicative location of Public Routes between E,K and J
- Public Realm
- Public Open Space
- Public Open Space on terrace
- Public Open Space or Private Communal Amenity space on rooftop
- Private Communal Amenity Space at Podium level
- Private Communal Amenity Spaces on Rooftop



Figured dimensions are in millimetres unless stated otherwise. All dimensions and levels shall be verified on site before proceeding with works. Detailed site survey to be carried out to verify positions and level relationships with the fixtures and equipment survey. The architect must be notified of any discrepancy. Measurements are indicative only and are to be verified by others.

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19029_Outline Planning Application

| REV | DATE | DESCRIPTION | BY | CHK |
|-----|----------|-----------------------------|----|-----|
| P1 | 13/07/21 | PLANNING APPLICATION REVIEW | | |

Allan & Morrison LLP Uplands Business Park
 Public Realm
 001_OUTLINE APPLICATION PARAMETER PLANS
 19029-AAM-00_07_020

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SCALE 1 : 1500 @A3

FOR APPROVAL

P1
 Review

Appendix E Illustrative Views of Wetlands Waterside park – top image view from stepped terrace across Flood Relief Channel and bottom image view across park and north-south pedestrian/cycle route

