

**LONDON BOROUGH OF WALTHAM FOREST LOCAL PLAN
SHAPING THE BOROUGH: PART 2 SITE ALLOCATIONS
PROPOSED SUBMISSION REGULATION 19 CONSULTATION**

Presented by the Head of Planning

SUMMARY

The London Borough of Waltham Forest are consulting on the final stage of the Site Allocations Local Plan Part 2 (LP2) – the Proposed Submission version. Part 1 Strategic Policies (LP1) is currently under examination.

The Authority responded to the previous stages of the Local Plan, including the Regulation 18 Local Plan consultation for the Part 2 Site Allocations and proposed that both the Ice Centre and the WaterWorks Centre and car park be included as Site Allocations within the Part 2 Local Plan document. Comments were also made in relation to three other site allocations within the Regional Park at Low Hall Depot and at sites on Sewardstone and Lea Valley Road, principally about securing the delivery of green space provision as part of any future redevelopment and the need for improved pedestrian and cycle connectivity. Comments on the New Spitalfields Market Site Allocation, which is outside the Park sought provision for substantial areas of open spaces to cater for the needs of the new residents, to be located and designed to complement the adjoining Lee Valley Hockey & Tennis Centre.

The Authority's draft representations on the Proposed Submission version of LP2 are attached as Appendix A to this report. These include a representation asking the Council to reconsider its position regarding the Ice Centre and the WaterWorks Centre and car park, which have not been included as site allocations. A leisure based site allocation for these two sites would demonstrate that the Plan has been 'positively prepared' enabling the Authority to improve and grow the visitor, sporting and wider cultural offer of the Regional Park for the benefit of local people within the South Waltham Forest strategic growth area and the wider region.

Further comments and representations are made in relation to content of site allocations where they are located within the Regional Park, in particular the need to identify the Regional Park as a relevant Planning Designation and to ensure site requirements and development guidelines for each site take account of the sensitive nature, visitor amenity and environmental requirements of the Park.

Further discussions will be held with the London Borough of Waltham Forest to try and resolve these issues but making formal representations at this stage of the consultation process allows for the matter to be considered at the Examination stage.

RECOMMENDATION

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

BACKGROUND

- 1 The Local Plan for the London Borough of Waltham Forest (LBWF) is in two parts. This current consultation concerns the final stage or Proposed Submission version of the Local Plan Part 2 Site Allocations (LP2). It follows the public consultation last year on the draft version of the Local Plan both the Part 1 Strategic Policies document (LP1) and an earlier version of the Part 2 Site Allocations. The LP1 Strategic Policies document has been submitted, alongside a suite of proposed modifications, to the Planning Inspectorate for independent examination. It contains the strategic and development management policies for delivering development across the borough.
- 2 The LP2 document has been set out to complement the Strategic Policies document allocating land for a range of uses to deliver the Council's spatial vision, objectives and development requirements. It identifies land allocations that will help address the needs of the local community over the next 15 years including key sites with the potential for redevelopment to provide circa 19,000 new homes. The LP2 document allocates 75 sites. It does not allocate all sites appropriate for development in the borough – it focuses on strategic sites (100 or more new homes) and key sites (considered critical to the delivery of the vision for the area but under 100 units).
- 3 Sites included have been through a selection process that accords with national planning policy and builds upon the Council's Call for Sites exercises undertaken 2017- 2019, together with the findings of the Growth Capacity Study 2018 which reviewed all sites and assessed whether they were achievable and deliverable. The Council's Industrial Land Audit was completed early 2021 and this has informed the process in relation to the suitability of the borough's industrial land for various uses and the scope for co-location and intensification. The representations received through the earlier Regulation 18 consultation stage have also informed the current site allocations.
- 4 Each site allocation includes supporting text on the planning designations relating to each site, indicative development capacity according to the type of use proposed, and estimated delivery or phasing timescales. Also specified for each site are the 'Site Requirements' and 'Development Guidelines' together with a 'Placemaking' Plan. This Plan is intended to provide a vision for how new development will be guided on the site; for example identifying key frontages, sensitive edges, locations for buildings of height, patterns of movement and retained trees. In determining planning applications, the provisions of the whole Local Plan will apply including the Council's Strategic Policies and policies within the London Plan.
- 5 The Authority responded in detail to the previous rounds of consultation on the draft Local Plan (Paper RP/13/19 and RP/45/20) and to the accompanying 'call for sites', proposing two sites for consideration; the WaterWorks Centre and car park, and the western portion of the Ice Centre car park, please refer to

Appendix B to this report. Both these areas are within Metropolitan Open Land (MOL). 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. Notwithstanding this position and in response to the previous draft LP2 Site Allocations consultation (Regulation 18), the Authority sought to make a case that a leisure based site allocation for both the Lee Valley Ice Centre and the Waterworks Centre and car park would be appropriate.

- 6 The earlier draft LP2 document included proposed allocations by the Council for new and replacement leisure developments as a component part the residential and other types of land use allocations, although these sites were outside MOL/GB designations. The Authority argued that the redevelopment of Lee Valley Ice Centre, given the recent positive decision for the new twin pad development, should also be recognised via allocation, or designation for solely leisure development. This would support the Ice Centre in its location long term as a key cultural asset for the borough. A similar allocation was also sought for the Waterworks Centre and car park to recognise its leisure use and potential, particularly for visitor accommodation. It was suggested that both sites could be shown on the same Placemaking Plan to highlight their location within the Regional Park and discussions were held with relevant officers at Waltham Forest on this matter.
- 7 It should be noted that the Submission version LP1 Strategic Policies document currently under examination includes draft Policy 84 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. Amendments to Policy 9 South Waltham Forest proposed by the Authority have also been included in the proposed Modifications to the Plan submitted as part of the examination documents for consideration. The amendment is reproduced below in bold and states:

Policy 9 South Waltham Forest

As the priority area for regeneration and good growth, proposals will be supported where they:....

N: 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.

8 Next Stage

Comments are now sought on the revised site allocations contained within the submission version of LP2. After the consultation period, this document will be submitted to the Secretary of State for independent examination. Representations made to this version must consider whether the LP2 Site Allocations document is 'sound'; has it been 'positively prepared', and is it 'justified' and 'effective' and consistent with national policy. All representations received will be submitted to the Secretary of State for consideration at the examination. No updated timescale is provided for this last stage but it is likely that an examination would take place in late Spring early Summer 2022 with adoption by the Autumn/Winter 2022. The Council hopes to have the Local Plan Part 1 Strategic Policies adopted by Spring/Summer 2022. Once fully adopted

the new Local Plan will replace the existing Core Strategy 2012, Development Management Policies Document (DMPD) 2013, and the Blackhorse Lane Area Action Plan 2015.

- 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 consider the new site allocations relevant to the Park. The letter at Appendix A to this report sets out the Authority's draft formal response and representations. Reference has been made to the Council's Consultation Report produced earlier in the summer, which details the Council/officer response to each comment made.

COMMENTS ON THE SITE ALLOCATIONS LOCAL PLAN PART 2 PROPOSED SUBMISSION VERSION DOCUMENT

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

No leisure based site allocations have been included for the Ice Centre site or the WaterWorks Centre and car park as requested by the Authority. The Council's stance does not appear to have changed from the previous consultation when it was reported that the Growth Capacity Study had excluded sites in the GB and MOL and the Council had therefore not considered these due to their policy designation. It is understood that the Council see the focus for LP2 as providing housing allocations to meet the Council's housing targets, identifying the most efficient use of land on existing sites to provide housing, including through colocation. Where leisure sites are included these lie outside MOL/GB and the allocations have sought to enhance provision in addition to the residential element.

- 11 It is proposed that the Authority maintains its position that allocating the Ice Centre and WaterWorks centre and car park as leisure sites would provide an effective mechanism to protect the long term future of these sites. These allocations would demonstrate that the Plan has been 'positively prepared' enabling the Authority to improve and grow the visitor, sporting and wider cultural offer of the Regional Park for the benefit of local people with the South Waltham Forest strategic growth area and the wider region.

12 Site Allocations Previously Identified as of Relevance

In response to the previous round of consultation, the Authority commented on five sites allocated within the borough due to their location in relation to the Regional Park. The main concerns at that time related to the content of the development guidelines and Placemaking plans particularly in relation to:

- Improving boundaries between the Park and adjoining sites;
- enhancing connectivity with the Park;
- ensuring development sites provide sufficient open and amenity space to provide for the needs of new residents; and
- the need to consider the visual and ecological impacts of future development in relation to the Park.

- 13 A number of the above matters have been addressed in the revised site allocations but key areas of concern remain. These include a need to recognise the Regional Park as a 'planning designation' where sites sit either wholly or partially within the Park, (for example sites SA52 and SA53 on Lea Valley Rd – please refer to Appendix C to this report). There is also a requirement for a stronger emphasis to be placed on the provision of green space and ecological enhancements as well as pedestrian and cycle connections rather than leaving

these as matters to 'be explored'.

- 14 Detailed comments were provided in relation to the Site Allocations for SA01 the Leyton Mills Retail Park and SA02 New Spitalfields Market. Although outside the Park boundary, these sites are located opposite and to the north of the Lee Valley Hockey & Tennis Centre, and immediately east of Hackney Marshes, please refer to Appendix D to this report. The Council have commissioned work on a development framework for a new mixed use neighbourhood 'New Leyton' which includes the above sites together with the Temple Mills Lane Bus depot and the Lee Valley Hockey & Tennis Centre. The latter two are both currently within the London Legacy Development Corporation (LLDC) jurisdiction and therefore not included in the Site Allocation document. Officers from the Authority have been involved in discussions with the Council and other stakeholders on the content and detail of the development framework. It is understood this work will now be used to produce a Supplementary Planning Document (SPD) for the New Leyton area with detailed guidance for development. A report on this SPD will be brought to a future committee in due course when it is issued for consultation.
- 15 Amendments have been made to both the Leyton Mills Retail Park and New Spitalfields Market Site Allocations and the changes proposed are largely positive and can be supported. They address the Authority's previous comments about the need to reference strategic cycle and pedestrian connections between both sites and the adjoining open spaces and public transport nodes. New guidelines have also been included for open green space provision and measures to enhance and create biodiversity as part of the development.
- 16 **New Site Allocations**
Six new site allocations are included in the LP2 Proposed Submission version. These all relate to existing Strategic Industrial Locations. Three of these sites are located adjacent or close to the Regional Park and three are situated within or partially within the Park; Argall Avenue, Rigg Approach and Lammas Rd, please refer to Appendices E and F to this report. It is important that those site allocations within the Park identify the Lee Valley Regional Park as a relevant Planning Designation; draft Policy 84 The Lee Valley Regional Park will apply to the development of these sites. This policy supports the Park Development Framework (PDF) Area Proposals and states that "*Development proposals affecting the Lee Valley Regional Park, must not contribute to adverse impacts on amenity, ecological integrity or visitor enjoyment; and will be expected to deliver enhancements where possible.*"
- To ensure the Plan is effective the planning designations for these sites will need to be amended to reference the Regional Park.
- 17 Inclusion of the Rigg Approach and Lammas Road industrial sites within the LP2 document provides an opportunity to secure long term enhancements to the Regional Park environment and the frontage of Lea Bridge Rd. It also enables the Council, landowners and other stakeholders such as the Authority to plan for and work co-operatively to secure the investment required for major green infrastructure and access improvements such as pedestrian and cycle links between sites, across or under main roads, over railway lines and watercourses. The master planning process referenced in the site allocations would be a means of securing this joint working on more detailed schemes.
- 18 The future of the Lammas Road 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. The draft comments attached as Appendix A to this report welcomes the guidelines set out in the Site Allocation but seek to ensure sufficient space is provided within the Site Allocation to provide for new green infrastructure and buffer habitat.

ENVIRONMENTAL IMPLICATIONS

- 19 There are no environmental implications arising directly from the recommendations in this report but the draft Local Plan for Waltham Forest, both Parts 1 and 2, once adopted will contain policies and allocations that guide and control development and the use of land within the borough that could have an impact on the protection, enhancement, and development of the Regional Park.

FINANCIAL IMPLICATIONS

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

HUMAN RESOURCE IMPLICATIONS

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

LEGAL IMPLICATIONS

- 22 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.
- 23 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

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

EQUALITY IMPLICATIONS

- 25 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 November 2021
Proposed Submission version Site Allocations
Document

PREVIOUS COMMITTEE REPORTS

Regeneration & Planning Committee	RP/11/17	Consultation by London Borough of Waltham Forest on the draft Local plan	14 December 2017
Regeneration & Planning Committee	RP/32/19	Consultation by London Borough of Waltham Forest on Regulation 19 draft Local Plan document	19 September 2019
Regeneration & Planning Committee	RP/45/20	London Borough of Waltham Forest Local Plan Shaping the Borough: Part 1 Strategic Policy Submission Version (Regulation 19 Consultation) and Part 2 Site Allocation (Regulation 18 Consultation)	3 December 2020

APPENDICES ATTACHED

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

LIST OF ABBREVIATIONS

LBWF	London Borough of Waltham Forest
PDF	Park Development Framework
SSSI	Site of Special Scientific Interest
LVH&TC	Lee Valley Hockey & Tennis Centre
HRA	Habitat Regulations Assessment
QEOP	Queen Elizabeth Olympic Park
MOL	Metropolitan Open Land
GB	Green Belt
LLDC	London Legacy Development Corporation
SPD	Supplementary Planning Document
SIL	Strategic Industrial Location
the Park Act	Lee Valley Regional Park Act 1966

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16 December 2021

Dear Stewart

RE: CONSULTATION ON THE PROPOSED SUBMISSION LOCAL PLAN SHAPING THE BOROUGH: PART 2 SITE ALLOCATIONS DOCUMENT (REGULATION 19 CONSULTATION) - LEE VALLEY REGIONAL PARK AUTHORITY REPRESENTATIONS

Thank you for consulting the Regional Park Authority on the Local Plan Proposed Submission Version Part 2 Site Allocations Document Regulation 19 consultation. A report on this matter was considered by the Authority's Members at the Lee Valley Regeneration and Planning Committee on the 16th December 2021 when the following representations were agreed.

Proposed Submission Version Local Plan Part 2 Site Allocations Document

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

The Authority maintains its position that both the Ice Centre and the WaterWorks Centre should be included as Site Allocations within the Part 2 Local Plan Site Allocations document. Including allocations for these sites would provide an effective mechanism to protect the long term future of these sites and their inclusion should be reconsidered. These allocations would demonstrate that the Plan has been 'positively prepared' enabling the Authority to improve and grow the visitor, sporting and wider cultural offer of the Regional Park for the benefit of local people within the South Waltham Forest strategic growth area and the wider region.

It is recognised that the above sites do not fit the usual template/proforma in that they are leisure sites and designated as MOL. It is also understood that the focus for LP2 is on allocating sites for housing to meet the Council's housing targets. However, the Lee Valley Ice Centre is a major leisure designation and community asset within the Lea Bridge Strategic Location contributing to the local and regional visitor economy, providing opportunities for ice sport, training and leisure activity. The WaterWorks Centre and car park is also a leisure site with potential for redevelopment for other leisure uses in particular visitor accommodation, in line with the Park Development Framework Area proposals.

Further comments on the proposed Site Allocations currently included in the Local Plan Part 2 Proposed Submission document are set out below and relate to sites located both within the

Regional Park and adjacent to its boundary. A number of new sites have been included in LP2 which are of relevance to the Regional Park and these have generated a number of comments. For ease of reference, key points are highlighted as representations for consideration.

South Waltham Forest

Sites SA01 Leyton Mills Retail Park and SA02 New Spitalfields Market

The Authority notes and welcomes the additional detail included as part of the site allocations and Placemaking plans for both SA01 and SA02, sites that lie outside the Regional Park but opposite the Lee Valley Hockey and Tennis Centre (LVH&TC). This detail has been informed by the recent work on the 'New Leyton' Development Framework with which officers have been involved. The framework also includes the LVH&TC and the Temple Mills Bus Depot, sites that which fall within the LLDC area. It is understood the Framework document will inform a New Leyton Supplementary Planning Document and this will provide more detailed guidance for development. The Authority would wish to be consulted on this document in due course.

The strengthening of proposed site requirements for strategic cycle and pedestrian connections between both sites and the adjoining open spaces and public transport nodes is endorsed, as is the requirement for development to support delivery of a new station at Ruckholt Rd. A new station in this location would significantly improve public transport accessibility for the Lee Valley Hockey and Tennis Centre. The Authority also supports the proposal to "explore a new pedestrian and cyclist bridge link over the railway lines connecting to Eton Manor" from the south of the Leyton Mills retail park. It should be clarified however, that all these measures will improve connectivity to the wider Regional Park as well as the QEOP. **Reference to the Lee Valley Regional Park has been dropped from the current text and should be reinserted.**

The Authority supports the requirement within the Development Guidelines for SA02 that significant public realm and green open space should be provided as part of development, including a new public park with an ecological focus. Given the quantum of development coming forward it is important that each new development is able to provide all the open space, amenity and recreational/leisure needs required by new residents and employees. Whilst the Lee Valley Hockey & Tennis Centre opposite includes areas of public open space and areas of valuable habitat the Authority's primary objectives in relation to the site are to ensure it continues to serve a regional, national and international sporting and leisure market, as well as serving local sporting need in relation to tennis and hockey. It forms part of the QEOP's zone of sporting excellence.

The Authority also welcomes the inclusion of Planning Guidelines which highlight the opportunities for onsite ecology and biodiversity including green buffers, daylighting the culverted river, improving the River Lea habitat, 'wild' public amenity and tree planting. These green and ecological spaces should be located and designed to complement the adjoining Lee Valley Hockey & Tennis Centre to the south and Hackney Marshes to the west. **The guidelines should specify a 'dark corridor' along the sensitive western edge of the site where it boards with the Regional Park and Hackney Marshes in order to enhance the existing wildlife corridor and ecological connectivity.**

Further detail on what the 'potential for height' as noted in the Placemaking Plan might mean would be helpful, given the proximity of these sites to the Regional Park. The Placemaking Plans should also 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 VeloPark will be important for example.

Site SO09 Low Hall Depot

The Low Hall Depot allocation sits partially within the Park to the north east of Walthamstow Marshes. **The Regional Park reference should be included as one of the Planning Designations in the site allocation.** This will relate to draft Policy 84 in the Local Plan Part 1 Strategic Policies.

It is noted that the site capacity has increased from 440 new homes to 700 with 16,400sqm of industrial floorspace (previously 2,500sqm of non-residential floorspace). **Provision of open space, urban greening and tree planting should be a requirement of development.** Currently the development guidelines only state that provision is to "be explored". The Placemaking Plan indicates proposed green space and pedestrian and cycle connectivity and specifies a strategic public connection between Low Hall Sports Ground and Low Hall Flood meadows. Providing pedestrian and cycle links to the rest of the Regional Park in line with the PDF Area 2 Proposals is missing however. The Area 2 Proposals 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.

The Authority supports the requirement for development to deliver improvements to Low Hall Flood Meadows, provided these safeguard existing ecological value. **Stronger guidance is required to realise the potential of the Dagenham Brook. As previously commented a river restoration scheme should be considered.**

North Waltham Forest

SA52 Motorpoint and SA53 Lea Valley Motor Company Lea Valley Rd

The Authority is concerned that although both these sites are located within the Regional Park this fact is not specified within the Planning Designations for the site allocations. **Both sites sit adjacent to an important east west route through the Park and any development should seek to enhance its quality and accessibility.** The Authority's previous comments highlighted the importance of delivering improvements to this area of the Park in accordance with the PDF Area 5 Visitor proposals. These would include provision of gateway features, combined with traffic calming, the setting back of fencing and the creation of broad pedestrian boulevards to be linked to the Lea Valley Walk and the Pathway Corridor (proposal 5.A.1). These points do not appear to have been addressed. As in the previous version the Placemaking Plan for SA52 retains a reference to the potential for tall buildings on site. **The development guidelines should therefore also recognise the proximity of the King George's and William Girling Reservoirs and their SSSI status.** These areas sit within the key north south route for bird migration in the Lee Valley and this will need to be considered in relation to any tall buildings and overlooking of the reservoirs.

New Site Allocations

SA63 North Circular SIL2 and SA69 Blackhorse Lane SIL3

Both the above site allocations relate to Strategic Industrial Locations (SIL) situated outside but adjacent to the Regional Park boundary. The Authority supports the inclusion of Site Requirements that identify the delivery of green infrastructure and open green space alongside the shared boundaries with the Park. SA69 is located adjacent to Walthamstow Reservoirs SSSI which forms part of the Lee Valley SPA and Ramsar. Future masterplanning for this site will need to ensure the inclusion of substantial open and green space as a buffer to development as well as measures to prevent impacts from noise, light, air and water pollution. Draft Local Plan Part 1 Policy 84 Lee Valley Regional Park states under bullet point F) that **"Planning applications for development at Blackhorse Lane will need to be**

accompanied by a project level HRA to ensure the development will not generate adverse urban effects on the Integrity of the Lee Valley SPA and Ramsar. "

The Authority welcomes the inclusion of development guidelines for SA63 that promotes the delivery of strategic cycle and pedestrian connections through the site to link with the wider area including land within the Park and within Meridian Water. **Reference to the Regional Park should be included so it is clear that these connecting routes will provide access to strategic recreational routes such as the Lea Valley Walk and Lee Valley Pathway and to major leisure sites such as the Lee Valley Leisure Complex at Pickett's Lock.** The Authority's PDF Area Proposals 4.A.1 include a proposal to develop a linear waterside park around Banbury Reservoir as part of a new visitor hub. The development guidelines identify potential for development to include a circular loop around Banbury Reservoir connecting to William Girling Reservoir so there is scope to explore the potential of this project as part of any future development proposals on this site.

SA70 Argall Avenue SIL 4 and SA71 Rigg Approach SIL5

The north east portion of the Argall Avenue SIL site and all of the Rigg Approach SIL are located within the Regional Park. The Planning Designations section of both Site Allocations should reflect this position. The Authority's PDF Area 2 Proposals (2.A.3 and 2.A.6 respectively) therefore apply. **For both sites the emphasis for the development guidelines and Placemaking Plans should be to improve pedestrian and cyclists routes, their quality and safety, enhancing and establishing links between sites and through into the Park to the south and west.** The Authority supports the Council in seeking to resurrect ancient routes such as the Black Path where it enters the Park from the north east and passes through the Argall Avenue site and to then establish a route alongside the eastern boundary of the Flood Relief Channel within the Rigg Approach site. This would, as stated need to include improvements to the existing footbridge crossing of the railway to the north of the Rigg Approach site.

Both Placemaking Plans identify the boundary with the Park as a sensitive boundary. The development guidelines need to be clear that improvements along this boundary should secure a scheme to enhance the Flood Relief Channel, its biodiversity value, its landscape and water quality and its recreational amenity as part of a green route through into the rest of the Park.

The Site Requirements should identify improvements to the Lea Bridge Road frontage of the Rigg Approach site under the Site Allocation. The Placemaking Plan indicates Lea Bridge Rd is a 'key frontage' but it is unclear what would be required as part of any future redevelopment. Reference to the PDF Area 2 Proposals for Lea Bridge Rd would be of benefit. These seek to improve the landscape quality of the road and to strengthen the awareness of crossing the park/valley, establishing selective visual connections to the open spaces of the valley to the north and south. **The Authority would wish to ensure the Site Requirements secure the delivery of a co-ordinated landscape treatment for the road frontage as part of any redevelopment, including directional and entrance signage that creates an entrance point to the regional park and the Borough.**

SA72 Lammas Rd SIL6 and SA73 Orient Way SIL7

The Lammas Road industrial estate is located within the Regional Park adjacent to the Lee Valley WaterWorks centre and Nature Reserve. **The Site Allocation should be amended to include the Lee Valley Regional Park as a Planning Designation relevant to this site.** The draft Local Plan Part 1 Policy 84 'The Lee Valley Regional Park' would therefore apply.

The Authority acknowledges that this is a Strategic Industrial location and that development would be expected to provide replacement SIL compliant floorspace capacity. The masterplan process identified as a site requirement should however look to address the relationship of this site to the Regional Park and consider how new industrial development, including the requirement to widen Lammas Road itself, can be delivered that also secures significant improvements to the amenity, ecological integrity and visitor enjoyment of the Regional Park.

The Placemaking Plan and Development Guidelines highlight the sensitive nature of the adjoining parklands and nature reserve. They include a requirement for improved green infrastructure, green space and planting along the boundary with the WaterWorks site. This is welcomed but **the Authority would wish to see sufficient space provided within the Site Allocation to achieve this new green edge and buffer habitat.** Green infrastructure principles should also be applied throughout the site given its location within the Park.

The Authority supports the principle of strategic cycle and pedestrian connections through the site linking to the Rigg Approach and the WaterWorks Centre and parklands together with the enhancement of the quality and safety of existing bridge crossings over the railway. **However, the detail of these routes and connections into existing pathways would need to take account of the Authority's own proposals for the Park and future plans for the WaterWorks Centre.**

The Orient Way SIL Site Allocation is set back some distance from the Regional Park behind Lammas Rd and Orient Way itself. **However, the development guidelines should ensure that the creation of green and biodiverse corridors along the site boundaries with Orient Way connect with similar provision and green infrastructure on the adjacent Lammas Rd site and link through to the Regional Park.**

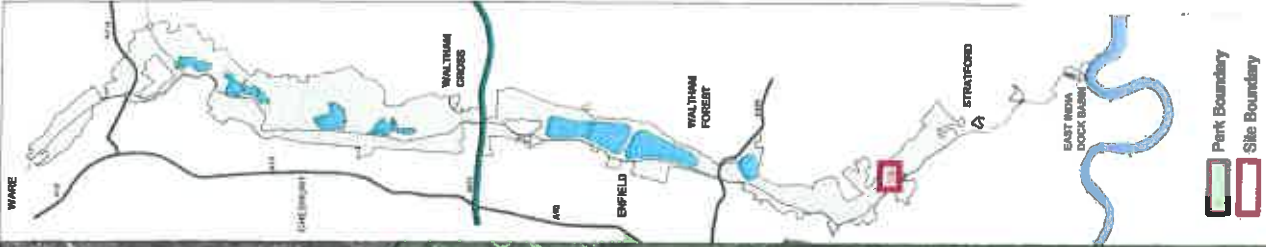
The Authority has raised a number of detailed points above in relation to those site allocations within or adjacent to the Park, particularly the new industrial locations. It is hoped that these detailed comments can be addressed through modification to the Proposed Submission version of LP2 in consultation with officers and as part of preparing the documents for examination. It is important to note however that the Authority would consider the LP2 document unsound if it does not reference the Regional Park as a Planning Designation within the Site Allocations that are situated within the Park. This would improve the effectiveness of the LP2 Site Allocations in delivering the Council's objectives for each area and the Regional Park.

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 Waltham Forest Local Plan: Plan 3 - Site Allocations for Leisure (Lea Bridge Road)

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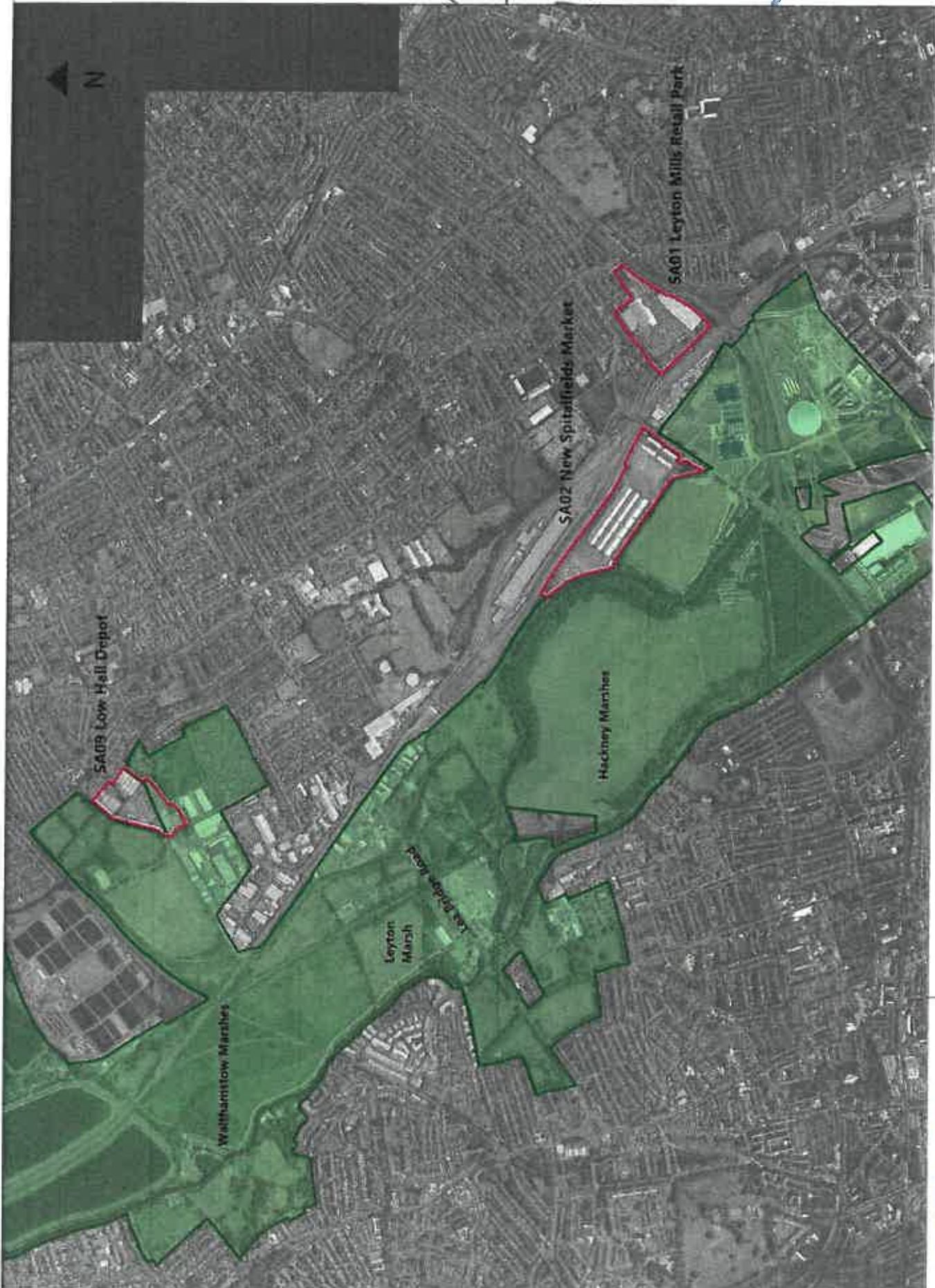
London Borough Waltham Forest Local Plan: Plan 1 - Call for Sites (Sewardstone Area)

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London Borough Waltham Forest Local Plan: Plan 2 - Call for Sites (Leyton and Low Hall Area)

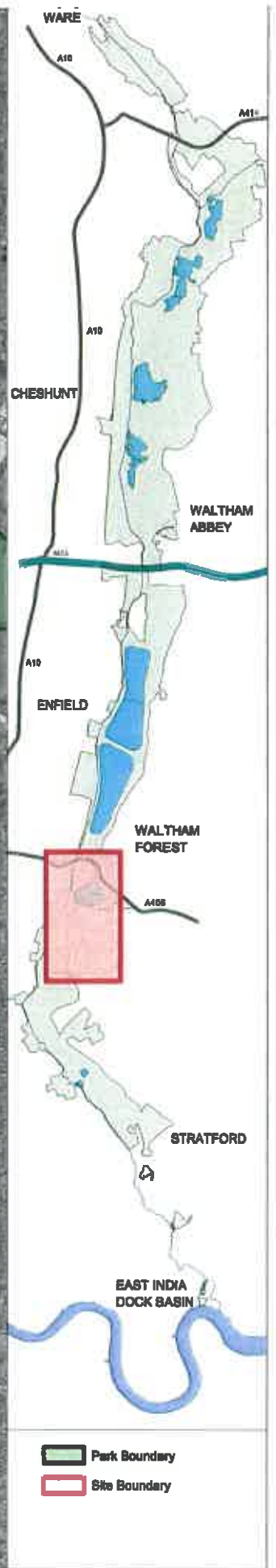
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 Park Boundary
 Site Boundary





London Borough Waltham Forest Local Plan: Plan 4 - Call for Sites (Lea Bridge Road Area)

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