

**LEE VALLEY REGIONAL PARK AUTHORITY**  
**REGENERATION AND PLANNING COMMITTEE**  
**18 NOVEMBER 2021 AT 11:30**

Agenda Item No:

**5**

Report No:

**RP/55/21**

**PLANNING CONSULTATION BY LONDON BOROUGH OF WALTHAM FOREST**

**DEMOLITION OF EXISTING STRUCTURES AND REDEVELOPMENT OF THREE LAND PARCELS TO DELIVER 345 X RESIDENTIAL UNITS (USE CLASS C3), 2427 SQM (GIA) COMMERCIAL FLOORSPACE (USE CLASS E) AND COMMUNITY FLOORSPACE (USE CLASS F2) IN BUILDINGS OF UP TO 26 STOREYS. ASSOCIATED DEVELOPMENT INCLUDING NEW PUBLIC REALM AREAS, TREE PLANTING AND LANDSCAPING, ACCESSES, PARKING AND SERVICING FACILITIES. AT LEA BRIDGE ROAD, LOCATION AS FOLLOWS:**

**SITE 1 ADJOINS RAILWAY OVERPASS TO SOUTHERN BOUNDARY, RAILWAY TO WEST AND ARGALL WAY TO NORTH AND EAST.**

**SITE 2 ADJOINS ORIENT WAY TO WEST, LEA BRIDGE ROAD TO THE NORTH AND REAR OF ELM PARK.**

**SITE 3 ADJOINS RAILWAY OVERPASS TO NORTH, RAILWAY TO WEST AND ORIENT WAY TO SOUTH AND EAST.**

Presented by Head of Planning

**SUMMARY**

This application seeks to redevelop three sites located adjacent and opposite to Lea Bridge Station for 345 residential units with associated commercial and community uses at ground level. The sites form part of the Lee Valley Opportunity Area and the Lea Bridge Strategic Location. They are situated outside the Regional Park, separated from its open spaces and venues by the railway line and a grouping of industrial estates along Argall Way and Lammas Road. They are however within 5 to 10 minutes walking distance of Walthamstow Marshes Site of Special Scientific Interest and the Waterworks Centre and Nature Reserve.

The principle of redeveloping the three sites for residential, commercial and community uses is acceptable given the strategic policy context and the policy allocations within the new emerging and well advanced Waltham Forest Local Plan.

The height of the two towers on Sites 1 and 3 are of concern in terms of their intrusion upon the open landscape character of the Regional Park and the current visitor perception of openness and removal from the surrounding urban area. The proposal has undergone a lengthy design review process to arrive at its current configuration. Amendments to the scheme have been discussed with London Borough of Waltham Forest and it is the case that significant reductions to the height of the development are unlikely, as the number of stories has been determined by the level of affordable units required, together with the considerable costs of dealing with the site constraints and commercial viability. In addition, intensive development

adjacent to train stations is accepted policy nationwide.

The development, given its size and location, will generate a regular and sustained increase in footfall to the Park. The potential impacts of this are not considered within the supporting planning documents, although the benefit of the proximity of these green spaces is recognised in terms of recreational facilities available to residents. Whilst the Authority welcomes visitors to its open spaces it needs to be able to manage access to, around and through sites to maintain, protect and enhance the open spaces and key biodiversity features for which they are valued.

S106 contributions are being sought to help reduce the impact on the Regional Park and a package of proposed mitigation measures is under discussion with officers at the London Borough of Waltham Forest; these will be presented at committee. They would be secured via Planning Obligations/S106 contributions as part of any permission, if the Council were minded to grant consent.

## **RECOMMENDATION**

**Members Approve:** that Members determine the Authority's position in response to London Borough of Waltham Forest for a planning application for residential development on the Lea Bridge Road Station Sites adjacent to the Regional Park.

## **DESCRIPTION OF SITE**

1 The application sites are located outside the Regional Park to the east of Lea Bridge Station and the London to Cambridge railway line, but lie within 5 to 10 minutes walking distance of Walthamstow Marshes and the Waterworks Centre and Nature Reserve. They comprise 3 largely open areas of land, located along Lea Bridge Road at the junction between Orient Way and Argall Way, please refer to the plans at Appendix A to this report.

2 **Site 1** sits north of Lea Bridge Road, contained by Argall Way to the east and the railway line to the west. Measuring approx. 0.29ha it abuts the bridge on its southern boundary and includes the entrance to Lea Bridge Station, some cycle parking and tree planting within a small public realm area. A cycle path connects Site 1 to Site 3 under the railway bridge, running parallel to the railway allowing cyclists to access the station entrance from Orient Way, thereby bypassing the junction of Lea Bridge Road and Orient Way.

**Site 2** lies to the south of Lea Bridge Road adjacent to Orient Way. It measures approx. 0.62ha and forms an area of informal open space, with footpaths featuring semi-mature and early mature trees. A large industrial unit lies to the south.

**Site 3** also south of Lea Bridge Road comprises an open grassed area adjacent to the railway, approx. 0.22ha, with a significant slope east to west and north to south of the site. It includes the cycleway connecting Orient Way to Site 1.

3 The surrounding area is predominantly industrial in nature with residential to the north-east. The Argall Way and Lammas Road industrial estates, both of which lie within the Regional Park, separate the 3 sites from the Lee Valley Riding Centre, the wider open spaces of Walthamstow Marshes Site of Special Scientific Interest (SSSI) and the Waterworks nature reserve, areas also designated as Metropolitan Open Land (MOL). A new residential development

completed in 2019 located to the east of Site 1 is dominant in views out along Lea Bridge Road to the east – this is the ‘Motion Development’ and varies in height from 5 to 18 storeys (300 units). Further from the Park to the east, the Lea Bridge Gasworks site also received consent (December 2020) for 573 new homes ranging from 2 to 18 storeys. Otherwise, the surrounding context to the east is predominantly two storey housing. Planning consent was granted in February 2021 for construction of a new entrance to Lea Bridge Station to be located on Lea Bridge Road where it will connect with the existing footbridge.

- 4 The application sites sit within an accessible location. Lea Bridge Station is served by the Greater Anglia London to Cambridge line with services into Stratford and Tottenham Hale. There are also good bus services connecting the area to central and east London. Cycle and pedestrian routes run east west along Lea Bridge Road, part of the Mini Holland network, and north south, including through the Regional Park.
- 5 The nearby open spaces of the Regional Park offer a wide range of informal recreational opportunities, distinctive landscapes and nationally recognised sites of ecological importance. These include Walthamstow Marshes SSSI and Nature Reserve, a rare example of semi-natural wetland in Greater London with a diverse flora and invertebrate fauna that has benefited from ongoing conservation and management by the Authority and a team of volunteers. This has also contributed to its value as a recreational resource within a heavily urbanised context. Similarly, the Waterworks Nature Reserve centred on Essex Filter Beds offers an important resource in terms of its nature conservation value, both for recreation and learning, as does the Middlesex Filter Beds which although adjacent lies within the London Borough of Hackney. A variety of pedestrian and cycle routes connect these areas into the wider Regional Park and Queen Elizabeth Olympic Park (QEOP) and to the surrounding residential and business communities.
- 6 The Authority’s visitor figures show there was a substantial increase in visitor numbers to Walthamstow Marshes, the WaterWorks Nature Reserve and Middlesex Filter Beds (MFB) during the Covid-19 lockdown period, please refer to the table below. More recently the numbers at the WaterWorks site have returned to their previous levels (according to the first two quarters of this year). Walthamstow Marsh has also seen a drop in numbers on the removal from lockdown, but this has stabilised at a higher number than previously seen (average of 157% increase between Q1 - Q2 2019/20 and 2021/22). Please note that MFB also saw substantial increases during lockdown but in 2021/22 the counter for MFB has not been working so the figures from 2019/20 will be used as a baseline.

| <b>2019/2020</b>  | <b>Q1</b> | <b>Q2</b> | <b>Q3</b> | <b>Q4</b> |
|-------------------|-----------|-----------|-----------|-----------|
| Walthamstow Marsh | 184,043   | 383,427   | 488,469   | 759,852   |
| WaterWorks        | 100,651   | 186,008   | 240,987   | 324,107   |
| MFB               | 18,102    | 36,304    | 53,439    | 79,472    |
| <b>2020/21</b>    | <b>Q1</b> | <b>Q2</b> | <b>Q3</b> | <b>Q4</b> |
| Walthamstow Marsh | 739,160   | 1,235,720 | 1,616,117 | 2,023,867 |
| WaterWorks        | 302,235   | 435,451   | 551,438   | 715,466   |
| MFB               | 62,583    | 93,887    | 132,917   | 189,092   |
| <b>2021/22</b>    | <b>Q1</b> | <b>Q2</b> | <b>Q3</b> | <b>Q4</b> |
| Walthamstow Marsh | 537,269   | 849,546   |           |           |
| WaterWorks        | 99,638    | 183,447   |           |           |

## POLICY BACKGROUND

- 7 The application sites fall within the Lee Valley Opportunity Area, an area identified for significant change, regeneration and growth in the London Plan 2021 (Policy SD1 Opportunity Areas). The London Plan recognises that “the Lee Valley occupies a strategic position in the London-Stansted-Cambridge-Peterborough growth corridor and provides a range of development opportunities for higher density development” including growth at Lea Bridge and Leyton (para 2.1.29). The sites are also located within the Northern Olympic Fringe Housing Zone.
- 8 The adopted development plan for Waltham Forest consists of the Core Strategy 2012 and the Development Management Policies (2013). Policy CS15 ‘Well Designed Buildings, Places and Spaces’ directs tall buildings (10+ storeys) to the key growth areas such as the Northern Olympic Fringe. Appropriate sites are to be identified through the development of Area Action Plans. Elsewhere within the Borough, tall buildings are considered inappropriate although in some limited circumstances, medium rise, taller buildings may be appropriate both within the growth areas and at other key locations, subject to meeting certain criteria.
- 9 The application sites are within the Northern Olympic Fringe area, but there is no Area Action Plan to identify the sites as suitable for tall buildings. Policy DM31 ‘Tall Buildings’ seeks to ensure tall buildings are carefully located and designed and identifies a number of provisions for consideration including the quality of design and architecture, impact on local and strategic views, and relationship to surrounding land form.
- 10 Policy DM12 Open Space, Sport and Recreation sub section H ‘The Lee Valley Regional Park and Epping Forest’ 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*”. It offers support for the Park Authority’s Park Development Framework.
- 11 The London Borough of Waltham Forest’s emerging new Local Plan is well advanced, and can be afforded considerable weight with the Part 1 Strategic Policies submitted for examination and Part 2 Site Allocations currently being prepared for a second Regulation 19 round of consultation. The application sites form part of the Lea Bridge strategic location and are identified as a Strategic Site Allocation (in the Local Plan Part 2) for intensification under Ref: SA07 ‘Lea Bridge Station Sites 1, 2 and 3’. They are considered suitable for a minimum of 300 new homes, 3,000sqm of non-residential floorspace including community and cultural uses, a new station entrance and open space. The ‘Placemaking Plan’ for the draft Site Allocation identifies areas in each of the three sites where there is the ‘potential for height’.
- 12 Draft Policy 57 Taller and Tall Buildings identifies Strategic Locations and Opportunity Sites as potentially suitable locations for tall and taller buildings although other considerations such as visual, environmental, functional and cumulative impacts will need to be considered. As stated in the policy, “Taller” buildings are those that are taller than their prevailing context and the typical shoulder heights proposed in a development. “*Tall*” buildings are substantially taller, making a significant impact on the skyline of the borough”. Recommendations for the range of appropriate heights for taller and tall

buildings in accordance with surrounding character are included. Sites suitable for 'transformation' could include taller buildings at heights of 10-13 or 14-17 storeys and tall buildings of 18+ storeys. Areas of transition could include lower heights 6-9 storeys for taller buildings and up to 17 storeys for tall buildings.

- 13 The Local Plan Part 1 Strategic Policies also contains draft Policy 84 'The Lee Valley Regional Park'. This states that Proposals, which affect the Regional Park, will need to be sensitive and proportionate and deliver enhancements where possible, and *"must not contribute to adverse impacts on ecological integrity, amenity or visitor enjoyment."* The policy also states that development that affects the Lee Valley Special Protection Area (SPA) will need to contribute to the mitigation of adverse effects on the SPA.
- 14 Park Development Framework area proposals are focused on protecting, restoring and managing the mix of habitats within the Park at Walthamstow Marsh Nature Reserve and SSSI and the WaterWorks Nature Reserve to enhance their ecological value, and contribution to the biodiversity and encourage further opportunities to improve public access for nature conservation. Emphasis is on the need to improve the quality and accessibility of pedestrian and cycle routes into the Marshes and the Waterworks site and the network of paths between sites and venues, including improvements to crossing points on Lea Bridge Road. Proposals highlight the need to establish a Park Gateway or entrance at the eastern boundary to the Park, with landscape and signage improvements, particularly along boundaries with the existing industrial sites.
- 15 The Lee Valley Regional Park Landscape Strategy Guidelines seek to protect the open character of the landscape in this section of the Park, highlighting the need to protect areas where open skylines predominate particularly given their sensitivity to development which may alter the skyline (LCA C3 and E2.). The Guidelines recognise the need for development adjacent to the Park to enhance the existing landscape framework so that it can integrate physically and visually with the open and marshland character. The harsh and visually intrusive development edges to the east and around Lea Bridge should be improved.
- 16 The Authority's Strategic Policies also provide guidance on major new development adjacent to the Park. Policy D3 states that the Authority will *"D3: Work in partnership with riparian councils to ensure that the design and layout of new development on sites both within the Regional Park and adjacent to its boundary:*
  - a) *enhances the Park avoiding detrimental impact on its ecological and heritage assets; and*
  - b) *provides sufficient open space to cater for the informal recreational needs arising from the development, including areas for play and for dog walking."*

Policy E2 is also relevant. It states that: *"Development proposed on sites either within or outside the Park which could adversely impact on its amenity will be resisted or planning obligations sought in line with other policies within this Plan."*

## **DESCRIPTION OF DEVELOPMENT**

- 17 The proposed development comprises 345 residential units alongside nine commercial/community use units in four buildings to be provided across the

three sites as follows:

- **Site 1** – Tower 1 comprises 132 homes and four commercial units (Use Class E)
- **Site 2** – the Courtyard blocks 3 and 4 comprises 68 homes and one community use unit (Use Class E/F2) and the Terrace, block 5 comprises 23 homes and three commercial units (Use Class E)
- **Site 3** – Tower 2 comprises 122 homes and one commercial unit (Use Class E)

The tallest buildings are located within Sites 1 and 3 with building heights for the Towers at 26 and 23 storeys respectively. The Courtyard building incorporates a taller corner element of 11 storeys at the junction of Lea Bridge Road and Orient Way opposite Towers 1 and 2 then steps down to 6, 5 and 4 storeys to the south and east. The Terrace places a taller element of 5 storeys fronting Lea Bridge Road and then steps down to 3 storeys along the eastern boundary to the rear of the residential properties along Elm Park Road.

- 18 The housing mix includes 119 x 1 bed units (2 person homes), 139 x 2 bed units (a mix of both 3 and 4 person homes), 77 x 3 bed units for 5 persons and 10 x 4 bed units for 5 persons. The development provides for 160 affordable homes (46% by unit and 50% by habitable room). 35% will be wheelchair accessible units.

19 **Design**

The Design and Access Statement (DAS) provides a detailed account of the design evolution for the current scheme, which has been through pre-app and Design Panel discussions with London Borough of Waltham Forest (LBWF) officers and the Greater London Authority (GLA). Towers 1 and 2 are the tallest buildings and have been conceived as a pair with similar elongated hexagonal footprints and form but with complementary differences in appearance. Both have double height commercial and residential entrances at ground level with residential above. The vertical brick piers and horizontal bands have been used to produce an ordered frame and the *“full height crown piers at the top of the buildings are used to stretch proportions and enhance the open frame through which the sky is visible”*. They are presented as a gateway to the LBWF. The tones of the brick, bands of metalwork and reconstituted stone used for the facades vary across the different buildings and have been chosen to “complement the earthy tones of the Lee Valley Park” and surrounding industrial character.

- 20 The Courtyard building on site 2 allows for a flexible building at ground floor and high levels of dual aspect residential flats above. Its massing is broken down by a series of stepping volumes from the tallest element (11 storeys) at the junction of Lea Bridge Road and Orient Way opposite Towers 1 and 2 stepping down to the Terrace building. This in turn seeks to create a transition between the mid-scale Courtyard typology and the existing 2 storey terrace houses along Elm Road. Please refer to images shown at Appendix B to this report.

21 **Visual Impact**

A ‘Heritage Townscape and Visual Impact Assessment’ (HTVIA) accompanies the application and forms part of the Environmental Impact Assessment. This has found that the proposals would not give rise to any unacceptable impacts to built heritage, townscape character or visual amenity and receptors. The visual assessment has identified no adverse effects, stating that there will be beneficial effects on a number of views in the area with the proposals creating a new

landmark development in the area.

**22 Access**

The proposed development is a car free scheme with the exception of 12 wheelchair accessible spaces. One active charging point will be provided on each site with passive provision installed elsewhere. Cycle lanes around the sites will tie into the existing Mini Holland cycle network and the proposed cycle super-highway between Dalston and Lea Bridge. The existing off-road cycle route between Sites 1 and 3 underneath Lea Bridge Road will be retained and realigned. Secure cycle parking storage for residents is included throughout the development accommodating 635 long stay spaces. 20 long stay spaces will also be provided for staff working in the commercial units. 40 short stay parking spaces are to be placed within the public realm of the site.

**23 Amenity and Open Space**

The application includes details of communal amenity space for residents. This comprises 1,1965sqm and is located on Site 2 on the podium (first floor) and rooftop of the courtyard and terrace blocks. In addition, a publically accessible green space of 790sqm is to be provided at ground level between the courtyard and terrace blocks. Further public realm enhancements are proposed on Site 1 and 3 to connect residents and the local community to the new station entrance including a station plaza. All residential units will include private amenity space in the form of balconies or terraces sized in accordance with relevant standards. The requirement from the development for 1,552sqm of playspace for 0-11 year olds will be provided across all three sites through a mix of internal and external spaces.

**24 Landscape**

The main landscape elements include the planting of street trees along the boundaries of all 3 sites, to frame Lea Bridge Road, Argall Avenue and Orient Way and provide a distinct green edge. Large terraced planters are to be used to demark spaces such as station forecourt and café spill out on Site 1. The cycleway along the western boundary of Sites 1 and 3 is to be bounded by planted terraces and gabion walls.

- 25** On Site 2 the proposed new area of green open space (750sqm), located between the Courtyard and Terrace Blocks, incorporates a mix of traditional lawn area, with mounded wild flower lawn edges, natural play areas, seating nodes and paths, and additional planting. At the podium level raised planters and specimen trees are proposed together with lawn space, playspace and seating. The Courtyard and Terrace blocks also include biodiverse sedum and wildflower roofs with solar panels. Please refer to Appendix C to this report for landscape public realm masterplan image.

**26 Drainage and Flood Risk**

A number of sustainable drainage systems are proposed as part of the landscaping including green roofs, pervious surfaces, rainwater harvesting, Bioretention systems/rain gardens within the landscaping and attenuation underground. A Flood Risk Assessment has been submitted as part of the application and in order to protect the proposed buildings from fluvial flooding all the access to the buildings are set above the design flood level and a range of mitigation measures are included. The risk of flooding to the Proposed Development from pluvial, groundwater and artificial sources has also been assessed and found to be low.

**27 Ecology**

Appropriate ecological surveys have been undertaken as part of the application process and an Ecological Impact Assessment (EIA) was completed to inform the Environmental Impact Assessment. LBWF also identified the need for a Habitats Regulation Assessment (HRA) of the proposed development. The scope for this HRA was agreed with Natural England and covers consideration of likely significant effects on the Lee Valley Special Protection Area (SPA), Walthamstow Wetlands and the Epping Forest Special Area of Conservation (SAC).

28 The HRA has considered the potential elevation in visitor pressure at the Walthamstow Wetlands SPA and the disturbance to flora and fauna that can arise from walkers and especially those exercising pets. It concludes however that the proposed development is unlikely to adversely affect the integrity of the SPA and has screened out recreational pressures upon the SPA. In its conclusion, it cites the extensive green spaces in the immediate locality i.e. within the Park at Walthamstow Marshes, as areas which will be used in preference to Walthamstow Wetlands, particularly given it is located further away from the development sites and operates a management plan that regulates visitor access and excludes dogs.

29 The findings of the ecological surveys and Ecological Impact Assessment demonstrate that the application sites are not in themselves of intrinsic ecological value, comprising mostly of amenity grassland, hard standing, scattered immature and semi mature trees and patchy scrub. No evidence of protected species was recorded during site visits, although the sites may support nesting birds (March – August inclusive). Recommendations are included to protect wildlife, enhance biodiversity across the sites and to ensure full consideration is given to impacts from lighting, including during construction. A Biodiversity Net Gain calculation has been undertaken and this demonstrates that the proposed development will result in a 168% net gain.

30 Ecological enhancements have been incorporated into the soft landscaping across the development, and include:

- provision of an ecological corridor on Site 2 along part of the southern boundary adjacent to the Terrace block; this will include native plant species and wildflowers;
- new tree planting and areas of native wildflower lawn within the new open green space on the ground level of Site 2;
- trees planting across the proposed development sites with 23 different species including native species, these are considered as habitat friendly vegetation for birds, bats and invertebrates; and
- biodiverse sedum and wildflower roofs on the Courtyard Building and the Terrace; these will include sand, gravels, bricks and log piles.

**31 Lighting Strategy**

Proposals for external lighting are to be worked up in further detail but the lighting strategy seeks to highlight key elements and features throughout the 3 sites, illuminate pedestrian areas and publicly accessible spaces during dark hours, with opportunities for tree up lights and bollard lights in some areas. Streetlights feature heavily around the roadways and junction. Consideration is to be given to the needs of wildlife; with some areas of planting intentionally left un-illuminated.



**32 Community Infrastructure Levy (CIL) and Section 106 (S106)**

In addition to the CIL liability the Planning Statement sets out a list of items that could be covered through financial and non-financial planning obligations/S106 contributions, for example affordable housing, highway works, cycle hub, bus stop and healthcare contributions. No reference is made to open space enhancements or the improvement to off-site habitats within the Regional Park.

**PLANNING APPRAISAL****33 Principle of Development**

The application sites are located outside the Regional Park within an opportunity area identified for significant, transformational change and as such the proposed scheme is largely in accordance with these policies. It would deliver much needed residential development, helping to meet LBWF housing targets, at an accessible location. The commercial and community component will activate the street scene adjacent to Lea Bridge Station and the design meets the required level of open/amenity space and achieves a net gain in biodiversity. Given this context, the principle of a residential led development across the three sites is considered acceptable.

34 The key issues for the Authority are the potential impacts of the proposed development on the visual amenity and recreational use of the nearby areas of the Regional Park, in particular the impact on ecology and landscape due to additional visitor pressure. These impacts relate to the design layout, and height of the development, the adequacy of open space provision within the development and the functions this can perform, and the potential recreational effects on sites of importance for biodiversity such as Walthamstow Marshes SSSI and the WaterWorks Nature Reserve.

**35 Design, Height and Mass**

The documentation accompanying the application seeks to demonstrate how the design layout, height, and mass of the development addresses the surrounding character and built form both in terms of the industrial context to the north and east and the open parkland setting to the west. The proposals demonstrate a development of high quality and an interesting blend of materials.

36 However, the arrangement of Towers 1 and 2 either side of Lea Bridge Road to mark the gateway to the Borough appears out of proportion to the surrounding built context, even taking into consideration the new 'Motion Development' opposite Site 2 which varies in height from 5 to 18 storeys. The majority of the surrounding context remains predominantly two storey housing, and large 1-2 and 3-4 storey industrial buildings. Although designed to be simple 'slender' structures, the height of the two Towers and their proximity to each other, introduces a new and unsympathetic scale of development to the area. This dominates views out along Lea Bridge Road from the Park and is also visible from the open spaces of the Park, including Walthamstow Marshes and the Waterworks site, please refer to Appendix D to this report for rendered and wireline views.

37 Whilst these structures might act as a gateway to the Borough and highlight the Lea Bridge Station entrance, they make little contribution to the Regional Park and its landscape character. It is acknowledged that the building design, the use of materials and changes in the colour and detailing creates variation, which helps to distinguish the volumes from one another and which in turn may assist in reducing the overall perception of mass. However, whilst the DAS

makes the case that the materiality of the development adheres to the surrounding residential and industrial areas and is complementary to the surrounding townscape, this is harder to appreciate from within the Park. From the rendered and wireline views provided, the development can be seen to intrude well above the height of existing trees along the boundaries of the WaterWorks Nature Reserve, visible from many viewpoints within the Park's open spaces.

- 38 The height and mass of the two Towers can also be considered as forming a further barrier or cluster of development at the Park edge, their considerable height interrupting views of the open skyline that typifies the open space character of the Walthamstow Marshes and Waterworks Nature Reserve. This area has also been identified as a gateway or entrance to the Regional Park and this should have been acknowledged through the scheme design, perhaps at the very least by extending the public realm treatment along Lea Bridge Road to the west to create a green link with the Park. In comparison, the lower heights within Site 2 work more in harmony with the surrounding context integrating visually with neighbouring development.
- 39 In conclusion, although not identified as a location for tall buildings in the adopted Development Plan, the more recent strategic policy context and emerging Local Plan policy seeks to intensify use of the application sites, noting the potential for buildings of height. It is understood from discussions with officers at Waltham Forest that on site physical constraints and the significant costs of relocating major services has led to a scheme incorporating tall buildings in order to achieve the quantum of affordable units required by policy and ensure a viable commercial scheme. On this basis, it is unlikely that a significant reduction in the height of the towers, such that the impact on the Park is reduced, would be a viable proposition. The location of the two towers adjacent to Lea Bridge Station and in close proximity to local facilities would also support a development with taller buildings.
- 40 **Open Space, Landscape and Ecology**  
The proposed development incorporates a range of open spaces and landscaped areas for play aimed at meeting both private and communal amenity and recreational needs. This open space provision is considered to meet the policy requirements within the London Plan and Local Plan and should make an important contribution to the amenity and recreational needs of the new residents. They will also help create a more attractive environment at ground level along Lea Bridge Road.
- 41 However, the design of the proposed development and on-site constraints has resulted in reduced on-site capacity for more active recreation, informal sport, walking and provision for exercising pets. It is likely therefore that the Regional Park will be regularly used for these purposes given its proximity. This will increase the existing visitor pressure and the disturbance to habitats and wildlife within the more sensitive areas such as Walthamstow Marshes and the Waterworks Nature Reserve. It is difficult to estimate the exact number of new residents given the housing mix but the Environmental Statement calculates the 345 units will support at least 707 residents (based on a household size of 2.05). It also recognises the proximity of "*attractive recreational opportunities to the west*" of the development sites in relation to mitigating recreational effects on the Walthamstow Wetlands SPA.
- 42 The submitted HRA assesses the impact of the proposed development on the closest European designated site, which is Walthamstow Reservoirs, also

- known as Walthamstow Wetlands. In this case, it has screened out recreational pressures on the SPA, but this is largely due to the presence of extensive green spaces in the immediate locality (i.e. Walthamstow Marshes) which are considered more convenient for new residents in terms of recreational use and dog walking. Outside of its scope is the assessment of any impact on the nationally important SSSI at Walthamstow Marshes or the regionally important WaterWorks Nature Reserve, the very sites that will be focus for new residents.
- 43 The cumulative impacts of lockdown and nearby residential developments have already seen an increase in the number of visits to the Park's open spaces around the Lea Bridge Road. Increased visitor pressure exacerbated by anti-social behavior and without careful management can lead to the degradation of these important sites. The proposed development is on the doorstep of these sites (within 5 to 10 mins walking distance) with potential for a regular and sustained increase in the footfall to them. The potential impacts of this are outside the scope of the HRA and are not considered elsewhere within the supporting planning documents. The Park Authority welcomes visitors to its open spaces but needs to manage access to and around/through sites to maintain and enhance the key biodiversity features. Consideration as to how the development can contribute to this work is under discussion with officers from London Borough of Waltham Forest.
- 44 Further detail should be incorporated into the scheme design to address potential adverse impacts on the ecological integrity, amenity and visitor enjoyment of the Regional Park, as outlined above, in accordance with the adopted Development Plan Policy DM12 'Open Space, Sport and Recreation' and the emerging Local Plan strategic policy 84 'The Lee Valley Regional Park'. The proposed development should deliver enhancements to the Regional Park.
- 45 **Ecological Matters Linked to Design**  
The ecological measures incorporated into the proposed development are largely to be welcomed. The inclusion of biodiverse roof spaces is supported, but it will be important that the extent of these is sufficient to provide areas for wildlife without disturbance from public access. This is unclear from the current information. The DAS identifies one area as the Ecological Corridor although this appears as an enclosed space with an ecological purpose on the associated plans. It is important that this area connects through to other habitats and spaces so it can provide a corridor through which wildlife can move. In order for the sites to work functionally as an ecological corridor, the planting should be drawn from a native, preferably local palette, that is applied across the three sites.
- 46 The ecological reports notes that two integrated roost features should be included in the development, and whilst this should be welcomed, further opportunities for integrating features should be explored; there is considerable potential for habitat boxes for a range of species including Peregrine, Kestrel, other birds, bats and invertebrates to be included.
- 47 The lighting strategy will need to be carefully designed and implemented so that a balance is achieved between the appropriate lighting of public spaces and the needs of wildlife, where some areas of planting and open space will need to be intentionally left un-illuminated. Use of lighting during the construction stage should also be minimised and turned off when not required. Given the height of the towers, it would be useful to have information as to whether there will be any light pollution in respect of nearby areas of the Park. A lighting condition should be included as part of any grant of consent that ensures the lighting

strategy is in accordance with the 'Institution of Lighting Professionals (2018), Bats and Artificial Lighting in the UK, Guidance Note 08/18', both during construction and operation, and to ensure it does not overspill into the Regional Park areas.

- 48 The construction phase of the proposed development also raises concerns. In particular, precautionary measures to protect nearby watercourses from indirect impacts during construction, including noise and dust, surface run-off and any other pollution should be included in a construction environmental management plan (CEMP). The CEMP should also ensure any works to remove trees or scrub habitat are undertaken outside the bird nesting season. This has been raised in the Environmental Statement and should therefore be covered by planning conditions.
- 49 The Environmental Statement recommends that the new features and planting of ecological interest should be *"provided with interpretation to local residents and the public to explain their purpose and value."* The understanding of the function of these features by residents will help to encourage their retention and management into the future. A similar provision should be included and secured by planning condition in relation to the Regional Park, for both the nationally important SSSI at Walthamstow Marshes and the regionally important WaterWorks Nature Reserve.
- 50 **Access**  
The Transport Assessment has demonstrated that the proposed development will prioritise active and sustainable travel, retain and improve the existing on-site cycleway, provide additional footways and a new signalised toucan crossing on Orient Way. Overall, this will improve pedestrian/cycle movement through the sites and the immediate street network and connect with the new Lea Bridge Station via the new public plaza.
- 51 It is not clear whether the development incorporates any measures to improve walking and cycling routes and crossing points within the wider network which would include routes that pass through the adjacent Regional Park e.g. along Lea Bridge Road. The new landscaped plaza included as part of the development will be an important public space in relation to accessing the Regional Park, so the opportunity to 'signpost' this, for example through interpretation, art works and wayfinding should be explored. The Transport Assessment refers to the potential to use the development's CIL payment to make improvements to the wider walking and cycling network and this would be supported, especially if it can improve the safety of visitors using and moving through the Park and along Lea Bridge Road.
- 52 **Section 106**  
Any planning obligations sought will need to be directly relevant to the application and proportionate to the development proposed. The proximity of the development and the impacts it will have on sensitive open spaces within the Regional Park as a result of increased visitor pressure and regular use by new residents, requires S106 contributions for works to mitigate these impacts. These would include works to strengthen habitats and improve their resilience to increased use and disturbance, designed and implemented in accordance with the SSSI designation and the Authority's Biodiversity Action Plan (BAP) and improvements to access routes and wayfinding to and within these areas. A schedule of projects with indicative costs is under discussion with LBWF and will be presented at committee. These would need to be secured as part of any planning consent.

## **ENVIRONMENTAL IMPLICATIONS**

53 These are addressed in the body of the report.

## **FINANCIAL IMPLICATIONS**

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

## **LEGAL IMPLICATIONS**

55 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.

56 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**

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

## **EQUALITY IMPLICATIONS**

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

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## **BACKGROUND REPORTS**

Application Papers 21.082

Oct 2021

## **APPENDICES ATTACHED**

|            |   |
|------------|---|
| Appendix A | Plans of application sites context and detail |
| Appendix B | Images of Development taken from DAS          |
| Appendix C | Public Realm/landscape and ground floor plan  |
| Appendix D | Rendered and Wireline views                   |

## **LIST OF ABBREVIATIONS**

|      |                                     |
|------|-------------------------------------|
| DAS  | Design and Access Statement         |
| LBWF | London Borough of Waltham Forest    |
| GLA  | Greater London Authority            |
| MOL  | Metropolitan Open Land              |
| SSSI | Site of Special Scientific Interest |
| QEOP | Queen Elizabeth Olympic Park        |

|             |   |
|-------------|---|
| <b>MFB</b>  | <b>Middlesex Filter Beds</b>                      |
| <b>SPA</b>  | <b>Special Protection Area</b>                    |
| <b>EIA</b>  | <b>Ecological Impact Assessment</b>               |
| <b>HRA</b>  | <b>Habitats Regulation Assessment</b>             |
| <b>SAC</b>  | <b>Special Area of Conservation</b>               |
| <b>CIL</b>  | <b>Community Infrastructure Levy</b>              |
| <b>CEMP</b> | <b>Construction Environmental Management Plan</b> |
| <b>BAP</b>  | <b>Biodiversity Action Plan</b>                   |



**Proposed revedevelopment of 3 sites adjacent to Lea Bridge Station for 345 residnetial units.**

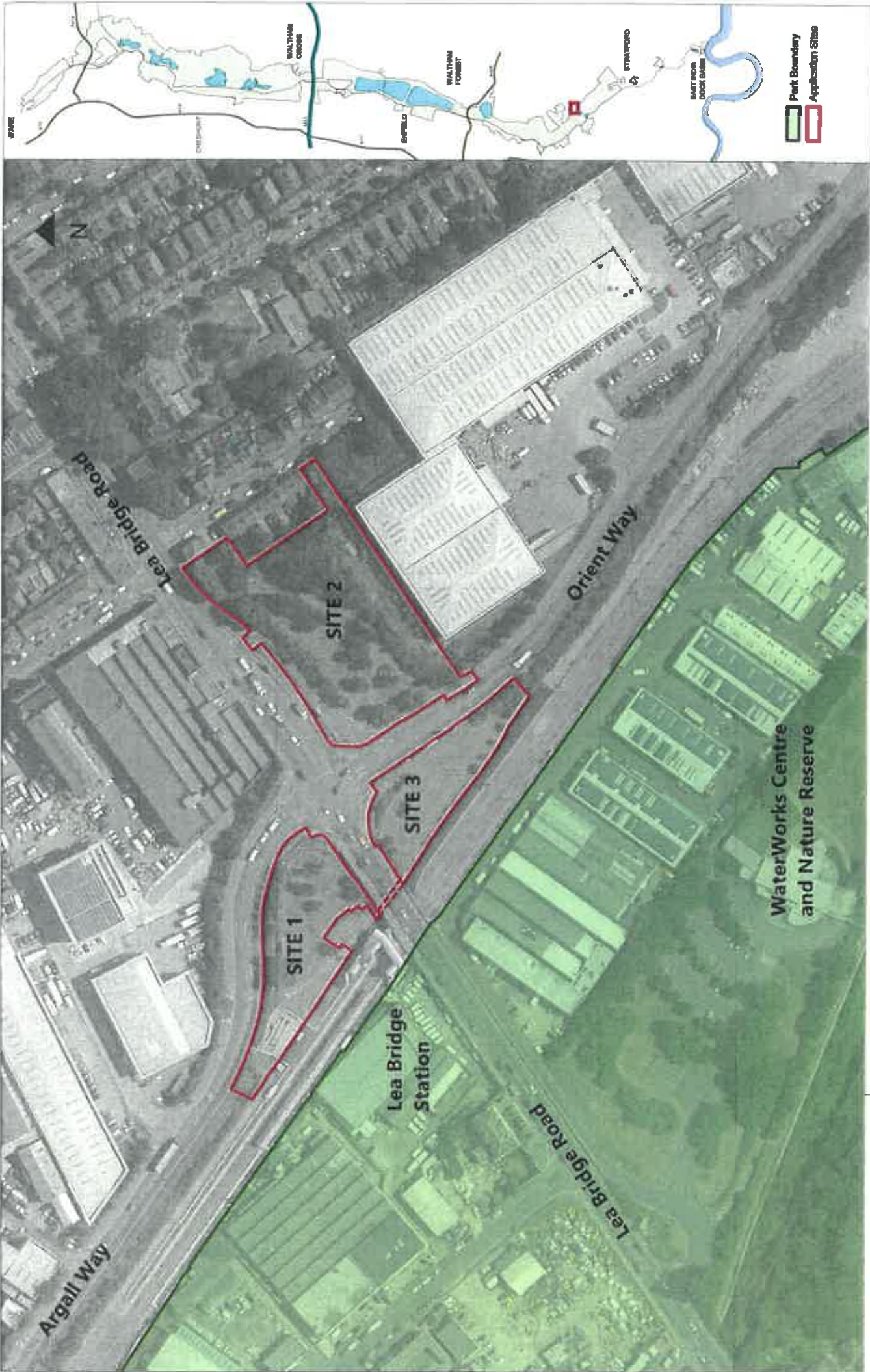
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Proposed redevelopment of 3 sites adjacent to Lea Bridge Station for 345 residential units.

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**Appendix B Extracts from Design and Access Statement**

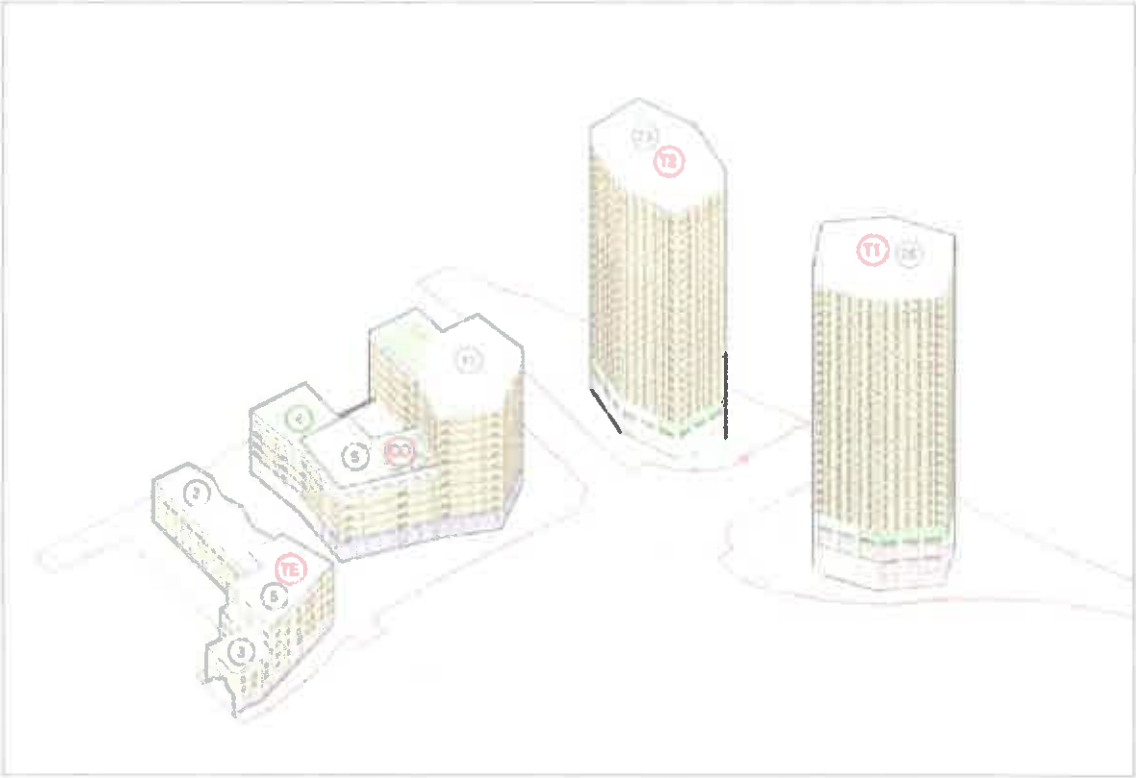


**Above - View of Tower 1 and 2 from Lea Bridge Road looking east.**



**Above – looking south from Lea Bridge Rd towards Site 2 and new public park, courtyard and terrace block.**

**Below – Building Design Approach**



- Commercial/Community Space
- Commercial
- Residential
- Residential Entrance
- Playspace
- Ancillary
- T1 Tower 1
- T2 Tower 2
- CO Courtyard
- TE Terrace
- X Number of Storeys

**Appendix C Public Realm/Landscape Masterplan and Ground Floor Plan extract from DAS. Below Landscape public realm masterplan**



**Below Sitewide Ground Floor Plan/Upper Ground Floor Plan**



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**Extracts from Heritage & Townscape Visual Impact Assessment**

**View 5 East along Lea Bridge Rd, entrance for WaterWorks Centre on left by lamp post**



**With Towers on Sites 1 and 3**



**View 11 From northern section of Walthamstow Marshes out across to the south east**



**View 12 from Lee Navigation Towpath**



View 18 from top of Aqueduct Path near Coppermills looking south east



View 15 south from Argall Way – Lea Bridge Station on the right



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