

From: **Reades, Jonathan** <[REDACTED]>

Date: Mon, 23 Jan 2023 at 11:47

Subject: Response to Local Plan Examination Stage 2 Consultation

To: [REDACTED]

Cc: localplanconsultations@walthamforest.gov.uk <localplanconsultations@walthamforest.gov.uk>

To Whom It May Concern,

I wish to make the following representation with respect of the LPE Stage 2 Consultation:

- That questions 2.3 and 2.4 (Distribution of Housing) and 3.3 (reliance upon Tall Buildings) and 3.5 (conformity with London Plan) call into question the Council's proposed changes to the Blackhorse Lane SIL do not conform with the policies and guidance set out in, inter alia, the Character and Intensification Study (LPE45) and related GLA Character and Context SPG1, the LBWF Urban Design PSD, and the Blackhorse Lane SIL Masterplan Framework Stage 1 (LPE53).
- Furthermore, these proposed changes link with Matter 4 (employment) and, specifically, 4.2 (redesignation of SIL to LSIS) being justified by the evidence.
- That Matter 6 (approach to Tall Buildings) is not adequately addressed — indeed, *cannot* be adequately addressed — by the proposed changes to the Blackhorse Road SIL.

Further to these points:

- In Figure 2 of LPE30, the Council proposes to redesignate the entire Blackhorse Road SIL as suitable for Tall Buildings. The Council has specified that for policy purposes a 'Tall Building' is one in excess of 10 storeys, indicating that the entire SIL is suitable for development of this height.
- However, there is no apparent recognition of the transitional nature of this area from a character perspective: at the Southern sub- area of the SIL higher densities and heights may be suitable in a way that they are not in the Central and Northern sub- areas. The designation is therefore inconsistent with the guidance set out in GLA SPG1 and the London Plan Guidance on housing that responds to its context and the identified character of place as well as wider links to legibility.
- The Skyline Study for the Blackhorse Lane SIL (LEP 46, p.83) differs from the areas indicated for Tall Buildings in LP2. Specifically, the entire area up to and beyond St Andrews Road is marked as suitable for 18–27 storeys. This fails to consider how character of the area changes as one heads north on Billet and the need for a sharper

transition than proposed in the Masterplan. The implication is that buildings further from the Tube Station will be taller than those immediately adjacent: this is incompatible with guidance linked to PTAL and to the GLA's guidance on legibility: taller buildings marking out 'central' areas.

- It also seems self-contradictory that the SIL Masterplan states that "Given this, upper storeys were excluded from industrial floorspace calculations because upper storeys do not provide 'industrial capacity' as set out in the draft London Plan Policy E." And yet, the Council is relying on exactly such 'stacked uses' to provide the industrial capacity that will be impacted by residential development. The Council cannot have it both ways and the Statement of Common Ground (LPE27) does not make it clear that the GLA has acceded to this selective interpretation.
- The proposed intensification of housing at the Blackhorse Lane area far exceeds anything previously identified as viable: for instance, viability for the Uplands Estate (LPE44.2) indicates a mid-point viability of 396 units in the absence of intensification supported by enhanced public and other transit accessibility. There is no indication that these supporting enhancements would be delivered in accordance with, for instance, Good Growth 3 (creating a healthy city) and the needs for a systematic approach to dealing with health infrastructures.
- The Masterplan (LPE53) also describes the area immediately around BHR as: "This area delivers high density homes as blocks of flats, which are deep in plan and medium rise. The character of the area is still evolving as it continues to be developed." This is commensurate with Category A close to existing development and, perhaps at the extreme Southeastern end, Category B1, development. There is no indication that Tall Buildings are appropriate for the Central and Northern sub-areas.
- Nor has consideration been given to the impact on 'strong communities' of such a large programme of housebuilding. While a degree of intensification should support additional social and community infrastructure(s) and help to develop the resources available to local residents, construction on this scale represents a wholesale transformation of the area without appropriate consultation of the residents in terms of overall impact (Policy SD1, Good Growth Principles Part 1, etc.)
- Point 2.4.4 of the Masterplan indicates that while demand is for smaller units, one of the benefits of the current configuration of space is that it *is* sub-dividable and reconfigurable. Specifically, "Through the 2010s, change was occurring across the Lee Valley, with creative uses taking up inexpensive space left vacant by industry." I note the emphasis on "inexpensive" space: the wholesale redevelopment of this space for residential and mixed use fails to consider the impact on

affordability of such redevelopment, nor the fact that these changes are being proposed prior to the redesignation of Cork Tree SIL and development of space there for industrial uses (despite the working agreement of the GLA and Borough, LPE27 specifically talks about new industrial floorspace being prepared in advance of the redevelopment of existing floorspaces).

- Further to this, I submit that purpose-built mixed-use development will be more expensive, less adaptable to future changes of use, and more restrictive in terms of the types of uses that are considered acceptable: fundamental incompatibilities are introduced if the entire SIL (and certainly the Central and Northern sub-areas) are considered equally suitable for intensification of residential use.

I would therefore submit that:

- That only the Forest Estate portion of the SIL is compatible with taller buildings as it forms a continuous typology anchored on Blackhorse Road Tube. However, these buildings to the north of existing Tall Buildings should not exceed 10 storeys (i.e. the definition of "Tall Buildings") except on that portion of the Forest Estate immediately adjacent to the area already released from the SIL as part of the preceding changes to the SIL boundary. The rest of the Forest Estate should not exceed 9 storeys and only in areas set well back from Billet Road.
- That the remainder of the Blackhorse Lane SIL is not compatible with the proposed redesignation for Tall Buildings and, consequently, not compatible with the reallocation of housing from other sites identified across the Borough. Buildings in this area should conform to the Character and Identity of the area in terms of not exceeding 4–5 storeys (it is notable that the Council's own character policy document uses a photo from a medium-density 4-storey site immediately adjacent to the area it proposes to designate as suitable for Tall Buildings!). The viability of LP2 appears to hinge on *all* of the units allocated to Blackhorse Road being built but this is only possible by ignoring key GLA and Borough guidance on the suitability of such development.
- That there has been no consideration of the assessment that "It should be recognised that intensification can be achieved without the need for taller elements by using robust and intense block structures in their place."
- That it is therefore *still* unclear that response to 3.1 in relation to Blackhorse Road SIL3 is 'realistic' in terms of net site capacities.
- That the proposed distribution of Tall Buildings makes no sense and decreases overall legibility of the area: Figure 2 and the Blackhorse Road Masterplan indicate that areas in Central and Northern sub-areas will substantially exceed the height and density of the Mandora site

which is located less than 3 minutes' walk from the Tube Station and in receipt of a correspondingly high PTAL rating. Considering the manner in which PTAL and building heights vary across the SIL this is inconsistent with any extant guidance.

In conclusion, it is not possible to see how the revisions to LP2 address the concerns raised by Inspectors with respect of Matter 6: the density and extent of tall buildings indicated by Figure 2 and the Blackhorse Road Materplan place the Council's housing allocation in direct conflict with London Plan policies relating to Character and Identity, Community and Community Infrastructure, as well as calling into question the continued viability of 'contemporary' light industrial activity on the site. The Council has not at all justified the suitability of tall buildings across the entire transitional site (Central and Northern sub- areas) and only partially justified their suitability in the Southern sub- area. There is no indication that such intensification is in any way "Character Led" (Policy 8). Consequently, the Council has failed to answer question 6.3 relating to the appropriateness and justification through evidence (additionally with reference to the nonsense of a Skyline Study LPE46 because the wireframes fail to substantially indicate the visual impact of indicative developments on the skyline!) of the sites identified in Figure 2.

Sincerely,

Jonathan Reades