AAP Modifications – Matters for Clarification

Inspector Modification MM3

It is noted that through the updates to Appendix B (i.e. MM3) there is an inconsistency in terms of the figures provided for Site BHL7 (Billet Works) and the details of the latest planning permission outlined in minor modification number 104 in the schedule of post publication modifications. For consistency it is suggested that this section of the table be further revised to read:

<table>
<thead>
<tr>
<th>Site No</th>
<th>Site Name</th>
<th>Residential units</th>
<th>Employment floorspace (m2)</th>
<th>Retail floorspace (m2)</th>
<th>Other Timeframe</th>
<th>D1 space</th>
</tr>
</thead>
<tbody>
<tr>
<td>BHL 7</td>
<td>Billet Works</td>
<td>349</td>
<td>1318 <strong>874</strong></td>
<td>792</td>
<td>Approximately 500 <strong>444</strong> m2</td>
<td>2014-2017</td>
</tr>
</tbody>
</table>

This modification will also have a knock on effect in terms of the total figures at the end of the table – i.e. the total figure in the employment column would subsequently reduce from 13358 to 12914

Inspector Modification MM8

Regarding MM8, the Council acknowledges the recognition given by the Inspector to the recently permitted Mandora and Legal and General schemes, and their implications in terms of setting the context for the remaining areas of the Station Hub opportunity site.

As set out in our response to IHD2-4, the Council would like to reiterate that recently permitted schemes at the Station Hub do not universally exceed 3-6 storeys – in particular the Mandora scheme comprises heights of between 4-8 storeys, with average heights across the scheme generally in the range of 6-7 storeys. Similarly, the Legal & General site currently benefitting from outline planning permission, whilst including taller elements along the Forest Road frontage of 7/8/9 storeys, comprises average heights across the majority of the scheme of 6-7 storeys, with smaller 2-storey elements fronting the reservoirs.

Whilst the rationale for supporting 5-9 storey buildings at the remainder of the Station Hub is understood, the Council has some concern that this could encourage future schemes that raise the threshold of developments to a higher scale and density, whilst also encouraging some heights above this range. Average heights could then become closer to perhaps 8-10 storeys rather than the current 6-7. In the Council’s view, this would not be consistent with the concept of the Urban Design Framework and the “area-based” approach that has underpinned the Area Action Plan.
Further, it might also be expected that development proposals would be a minimum of 5-storeys as a starting point, rather than any consideration of appropriate heights below this level. Indeed, there may be some site-specific circumstances where even 5-storeys may be considered inappropriate and potentially detrimental to the immediate built context.

In order to encourage future schemes that are largely within the 3-6 storey range, whilst also offering some scope for additional height at the Station Hub in line with what has recently been permitted, the Council suggests the following alternative wording to MM8. These modifications also make clear that whilst the Urban Design Framework refers to tall buildings as problematic, this is in the context of the environmental designations covering High and Lower Maynard Reservoirs:

Replace criterion D of policy with:

"D) ensure appropriate building heights that respond to the existing built context and adjacent landscape features. Across the AAP, building heights should normally be 3-6 storeys. At the key gateway site of BHL1: The Station Hub and Waterfront, some taller elements that exceed this range (up to but not exceeding 9 storeys) may be acceptable, subject to an exemplary standard of design. Tall buildings (i.e. 10 storey and above) will not be acceptable anywhere in the plan area."

Replace 3.5.13 – 3.5.14 with:

"Policy CS15 (Well Design Buildings, Places and Spaces) from our adopted Core Strategy sets out that 'tall' (10 storey +) and 'taller' (5-9 storey) buildings may be appropriate on specific sites in the borough’s key growth areas, including Blackhorse Lane.

However, the Urban Design Framework considers that tall buildings are problematic close to SSSI and SSA designations, and recommends building heights of 3-6 storeys in order to strike a balance between optimising densities and being sensitive to the existing built fabric. Recent planning permissions at Site BHL1 (The Station Hub and Waterfront) include developments that partially exceed this range.

In this context, whilst new developments in the area should normally be 3-6 storeys, there may be some scope for an element of taller buildings at Site BHL1 (Station Hub and Waterfront); where these can act as landmarks and contribute to good placemaking, by adding to the legibility of the area.

Where additional height is proposed, schemes should be exemplars of design quality, demonstrate that they would have no potential effect, either directly or indirectly, on the Lee Valley SPA and RAMSAR sites and on the Walthamstow Reservoirs Site of Special Scientific Interest, and address the detailed criteria set out in Development Management Policy DM31 – Tall Buildings. Any such
development would also need to pay careful consideration to its interrelationship with existing buildings of merit such as the Standard Music Venue and Tryst Public House.”

Inspector Modification MM9

As part of MM9, the updates to the planning history of Site BHL1 does not make clear that the Mandora scheme includes the refurbishment and extension of 7 Blackhorse Lane to provide additional A3/ B1/ D1 space, or that the Legal and General scheme is outline rather than detailed. The Council therefore queries if these matters could be clarified through the following additional modifications:

“2013 – Approval of redevelopment of part of site to provide 484 residential dwellings, 519 rooms of student accommodation, 1080m2 retail space, 305m2 B1 space, refurbishment and extension of 7 Blackhorse Lane to provide flexible A3/B1/ D1 floorspace, and provision of a linear park

2014 – Outline approval for demolition of existing and mixed use redevelopment comprising 311 residential units, up to 2210m2 commercial/community floorspace (A1/ A3/ B1/ D1 class uses), creation of two vehicular access, new internal roads, car parking, open space/landscaping and highway works”