

Blackhorse Action Group (BAG)  
Edward Road E 17  
Walthamstow, London

Mr Harry Hudson  
Green Issues

24/11/2007

Dear Mr Harry Hudson,

**Re: Former Railway Depot and Circle Anglia Land, Blackhorse Road**

Thank you for your letter of 14 June 2007 and for your efforts to keep the Blackhorse community informed. We will inevitably be affected by future developments on the BHL2 site (c.f. the Blackhorse Lane Interim Planning Policy Framework) and are concerned to ensure that consultation/**involvement/engagement** takes place and that the development is done properly.

The Blackhorse Action Group (BAG) still considers it essential to meet developers and architects - not just prior to the submission of a planning application, but at a much earlier point, i.e. at the design stage. Surely it is better to have our input at the outset in order to minimise the chances that the proposals subsequently run into objections because they fail to take into account of those people who are, after all, best qualified to discuss what the local area needs and will put up with. We're not just talking about consultation - this is common sense due diligence: you wouldn't tailor a suit for someone you'd never measured, would you? Please remember: we are an intelligent and informed bunch of people, *not some bunch of local nutters hell-bent on putting a spanner in your works.*

BAG recognises both the need and the desirability of quality **designed** developments in the area, but we are concerned that we get the right developments. We hope to see a high-grade mixed-use development on BHL2 that is excellent in its own right, which complements the rest of the built environment, and which does not place additional burdens on the local infrastructure. We strongly urge you to understand that your best hope of achieving this is to join forces with those who really understand the area; combining the technical know-how of your architects and designers with our affection for and understanding of the local area would be an excellent way to ensure a really exceptional development. It would help to set a new benchmark in truly consultative/**involvement** community development and earn brownie points galore from C.A.B.E.

- A well-designed, functional and sustainable neighbourhood/development offering a mix of housing types and sizes as well as life-work possibilities to get a balanced community.
- Provision of indoor space for community, artistic and commercial purposes, e.g. community hall, craft studios, learning centre and other services.
- Well-designed open spaces providing areas for social activity.
- Well-designed green infrastructure including children play areas, attractive walking and cycling routes and biodiversity.

BAG also requests detailed answers to the following questions, which arise out of the letter we received from you:

- 1) What is the range of new ideas that might make the innovative London-Wide Initiative successful?
- 2) How will you ensure that the commercial and political aims of the London-Wide Initiative do not compromise the quality of design, construction and management of the development?
- 3) What is the maximum number of homes planned for the BHL2 site, and what provision of services is envisaged?
- 4) What will be the proportion of family homes (i.e. larger than 2-bed flats) within the development?
- 5) What will be the proportion of properties to buy and to rent?
- 6) What will be the **pedestrian and transport** access arrangements?

We would also like to learn more about the other projects that Key London Alliance is working on with regards the London-Wide Initiative. We would appreciate it if you provided us with information about those projects, including their locations.

BAG hopes that a broader environmental impact assessment, in accordance with the EIA Regulations, will be commissioned for the site. This assessment should encompass all those areas where environmental impact might be significant, including socio-economic, landscape and visuals, air quality, noise and vibration issues, as well as proposing ways of mitigating the adverse effects that the development may cause on, for example, the adjacent Site of Special Scientific Interest (SSSI) **and Douglas Eyre Playing Fields**.

With regards to transport impact, the devising of a Travel Plan and its implementation will be vital to tackling increased traffic congestion in the area around the BHL2 site. The Blackhorse Lane area is already massively congested, and residents are understandably concerned about the impact on local infrastructure of any proposed developments. We have already spoken to the Victoria Line, and it is clear from their response that the rather dismissive view taken by the Council, ('Let them take the Tube!') is not adequate, since the planned refurbishment of that line will not increase capacity by anywhere near enough. So, we might discuss **environmentally friendly travel plans, car pooling, car**

**clubs, cycling and pedestrian routes.** However this is done, it must be joined-up if it is to be a success.

Ultimately BAG would like to see, over and above the other evaluation and assessment reports, sustainability practice implemented at all stages of the process of redeveloping the site. Mere compliance with local, regional and national policies will make the development obsolete within a few years. The project should exceed current requirements and aim for 'Excellent EcoHomes certification', as defined by **BREEAM or the equivalent for the Code for Sustainable Homes**. This has been proved by other developers working in the London-Wide Initiative to be perfectly achievable: compare Firstbase at Adelaide Wharf, which attained an accreditation of four 'Sunflowers' for the 'Excellent' environmental rating performance of the dwellings **when looking at the energy efficiency and CO2 release, water efficiency, site waste management, household waste management and use of materials**. We want at least four sunflowers!

**Taking into account the high risk of flooding of the area special attention should be given to the water surface management. The development should integrate all effective systems to reduce the risk of flooding and process rain and waste water, e.g. sustainable urban drainage systems (SUDS), green roofs, wetlands habitat construction etc.**